

[REDACTED]
(By email)

Our Ref: MGLA230419-0915

20 May 2019

Dear [REDACTED]

Freedom of Information request - Pan London Rough Sleeping Social Impact Bond (SIB)

Thank you for your request for information relating to services delivered by Thames Reach and St Mungo's, which the GLA received on 19 April 2019. Your request has been dealt with under the Freedom of Information Act 2000.

Our response to your request is as follows:

- *Amount of funding contributed or to be contributed by Social Outcomes Fund, Commissioning Better Outcomes Fund or other Big Lottery Funds*

There has been no funding from the Social Outcomes Fund, Commissioning Better Outcomes Fund or other Big Lottery Funds.

- *Amount of funding contributed or to be contributed by Ministry of Housing, Greater London Authority, Department of Communities and Local Government*

The Ministry of Housing, Communities and Local Government (MHCLG) have contributed £2 million to the current London Rough Sleeping Social Impact Bond and the Greater London Authority (GLA) has contributed £1 million.

- *How payments will be made and measured*

The London Rough Sleeping Social Impact Bond is a 100% payment by results service. Each quarter providers Thames Reach and St. Mungo's upload outcomes claims to the Combined Homelessness and Information Network (CHAIN) database along with evidence for approval. Each outcome is assessed, and evidence reviewed to ensure that requirements are met for a successful outcome's payment. If an outcomes claim is successful, this will be approved on the CHAIN database, leading to an outcomes payment at the end of the quarter. If an outcomes

claim does not meet requirements, this is queried on the database and providers can resolve any issues with queried outcomes and re-upload the outcomes claim.

When reviewing the outcomes claims from a provider, each outcome is measured against a set framework of specific eligibility and evidential requirements. These need to be met to achieve a successful outcomes payment. No outcome can be claimed more than once except for the general wellbeing assessment which can be claimed three times. Additionally, providers can only claim for entry and sustaining substance misuse treatment for either drug or alcohol misuse, providers cannot claim for both.

Please see below for additional information on evidential and eligibility requirements for each outcome:

- *Entering accommodation*

An individual will be deemed to be entering into accommodation if they enter any accommodation and remain in any accommodation for at least one night and the evidence for this is attached to the CHAIN database.

- *Sustained accommodation (at 3 and 6 months)*

Sustaining 3-6 month Accommodation: Following the first contact with a provider and entry into accommodation, the provider can then work with an individual to achieve their first sustaining accommodation outcome i.e. moving an individual into stable accommodation or helping them sustain their existing hostel accommodation for 3 / 6 months from the point of first contact (only hostel and stable accommodation can merit payment i.e. sustainment in b&b, NSNO staging post or temporary accommodation cannot be claimed for). To claim for three to six-month sustainment there should be no more than four bedded down street contacts during each three-month period.

- *Sustained accommodation (12, 18 and 24 months)*

The 12-month sustainment payment can only be made once for access to stable accommodation for a given individual. The initial 12-month sustainment payment can include the period where the client is in hostel accommodation. For example, an individual could have been in hostel accommodation for a full eight months and then moves into an assured shorthold tenancy at the start of the ninth month. In this example, the individual would only then need to be stable in accommodation for a further three months before the 12-month sustainment outcome could be claimed. However, the 12-month sustainment target cannot be paid where an individual remains in hostel accommodation past 12 months until they enter stable accommodation. After the 12 month milestone has been met the provider can continue to work with the client to meet the 18 and 24 month targets. For 12, 18- and 24-month sustaining accommodation claims, the definition of independent stable accommodation will be based on the type of tenure held by an individual. The following types of tenure will generally define stable accommodation: an assured tenancy (periodic or fixed term), an assured shorthold tenancy (periodic or fixed term) or a secure tenancy.

- *General wellbeing assessments*

Three wellbeing payments will be paid out following the completion of a wellbeing assessment using the Warwick Edinburgh Wellbeing Scale. Achievement of this outcome will not require an improvement in reported wellbeing but considering changes in reported wellbeing alongside

achievements in other outcomes, may form part of the evaluation of the project, and this information should be recorded. The first assessment must take place and be claimed within three months of initial engagement with the client, this would be three months from the date of the privacy notice and there must be a minimum of six months between each assessment.

- *Entry into mental health services*

An outcomes payment will be paid out for those clients with a mental health support need on CHAIN following an initial assessment with either a GP or a mental health specialist (such as a psychiatrist). This can include a psychiatrist or psychologist within a drug and alcohol treatment service. Self-diagnosis, or diagnosis by a non-health professional will not be eligible for an outcome's payment. A letter from the mental health service provider/GP or treatment provider will be required or a certification by the provider using the GLA self-certification form to submit a claim for this outcome. In achieving this outcome an individual should also be registered with a local GP.

- *Sustained engagement with mental health support*

An individual will be eligible for an outcome's payment after a 6-month continuous period of engaging with mental health support. This could include: inpatient treatment, psychological therapy service, specialist mental health service, community mental health services, cognitive behavioural therapy (CBT), peer support or social prescribing. Due to the diverse nature of mental health conditions, there is no set definition for 'support'. Providers should work with individuals to develop a plan. Providers are then responsible for ensuring that individuals are continuing to engage with their plan across the 6 months. Where possible providers should look to engage with relevant local health services, so that a clinical perspective can be incorporated into the approach taken.

- *Entry into alcohol or drug misuse treatment*

The entry into alcohol or drug treatment outcomes, payment will be paid out following the start of a structured treatment intervention for an individual with an alcohol or drug support need recorded on CHAIN and diagnosed with an alcohol or drug misuse problem. This outcome can only be claimed once and cannot be claimed alongside the other substance misuse outcome. This outcome cannot be claimed in the final six months of the service. The definition of 'structured alcohol and drug treatment' is that it consists of a comprehensive package of pharmacological and/or psychosocial interventions provided as part of key-working or case management approach. Structured treatment should be reported to the National Drug Treatment Monitoring System (NDTMS) by the alcohol or drug treatment provider as a tier 3 or 4 treatment as defined by models of care. It requires a comprehensive assessment of need, and is delivered according to a recovery care plan, which is regularly reviewed with the client. Alcohol and drug support services such as drop-in, needle exchange, peer support and outreach advice are not structured treatment and are therefore not eligible to trigger the outcome payment.

- *Sustained engagement with alcohol or drug misuse treatment*

The sustained engagement with alcohol or drug treatment outcomes payment will be paid out following 12 weeks of continuous engagement with a structured alcohol or drug treatment programme. If an individual enters into treatment, but then subsequently drops out before achieving the 12-week sustainment outcome, then they would need to be supported to sustain treatment for a further 12 weeks before being eligible for an outcome. This payment can only

be claimed once. If an individual successfully completes alcohol or drug treatment within the 12 weeks, then the SIB provider is also eligible for payment, however a letter will be required from the treatment provider to confirm treatment has been completed successfully. Where an individual is in treatment for both alcohol and drug misuse whilst they should be supported to achieve both outcomes the provider can only submit an outcome claim for sustainment against either alcohol or drug treatment, not both.

- *Improved education/training*

An outcome payment will be paid on the completion of any vocational or academic qualification recognised in the Ofqual Regulated Qualification Framework. This includes Awards, Certificates and Diplomas at Entry level or above. The qualification must entail a minimum of 20 guided learning hours (GLH).

- *Volunteering (at 13 and 26 weeks)*

To receive payment under this metric a volunteer must carry out at least 6 hours voluntary work a week (this can be averaged over the 13 and 26-week period, provided that the minimum is met). Where the individual was volunteering prior to being referred into a cohort then this cannot be counted towards an outcome. Normally an individual will volunteer for a charity or a not for profit organisation (e.g. registered social landlord). However, there may be circumstances where an individual is placed with a company to receive work experience, which can also be treated as volunteering. Any placement must conform to the recognised volunteer good practice code and must include a clear role description, supervision by a paid member of staff and a letter confirming volunteering or placement or contract. Unless there is evidence that these elements are in place then the provider will not be eligible for payment. Consideration must also be given to the requirements of claiming JSA and other welfare benefits where relevant.

- *Part time work (at 13 and 26 weeks) and Full time work (at 13 and 26 weeks)*

Where the individual was employed prior to being referred into a cohort then this employment cannot be counted towards an outcome. However, outcome payments can be claimed where an individual's employment situation is improved. (E.g. an individual working part-time is supported into full-time work). A payment can be made for each employment outcome, but each employment outcome can only be claimed once. This means that an individual can move from voluntary work to part time employment and then onto full time employment. However, once both the 13 weeks and 26 weeks full time employment outcomes have been claimed, it is not possible to claim any further full-time employment outcomes. It will be possible to claim outcomes for employment and volunteering concurrently, provided these are different activities. So, where an individual is volunteering, and is employed, then two outcome payments can potentially be claimed. A part time worker is someone who works less than a full-time worker. For this metric, a part time worker is someone who is employed between 8 and 24 hours a week evidence must be provided that an individual is employed. This will usually be in the form of a copy of the individual's payslip and/or employment contract. Consideration must also be given to the requirements of claiming JSA and other welfare benefits where relevant. Full time employment is defined as someone who works a minimum of 25 hour a week.

You also asked for:

- *Amount of funding contributed or to be contributed by Thames Reach, St Mungo's and external investors*

- *Amount of payment for each outcome as follows*

This information is exempt from disclosure under section 43 (2) (Commercial interests) of the FOIA. This provides that information can be withheld from release if its disclosure would, or would be likely to, prejudice the commercial interests of the GLA and service providers.

A commercial interest relates to a person's ability to participate competitively in a commercial activity and in this instance, involves information which is subject to negotiations and ongoing commercial dialogue. Disclosure would be likely to prejudice the ability of the service providers to negotiate on future contracts.

The GLA funds the SIB along with MHCLG (the amount we fund is in the public domain and is included above). The service is 100% based on payment by results, and the GLA only pays providers for the outcomes they achieve. Therefore, providers need external investment to complete their work and sharing the investment they have secured is commercially sensitive because it can affect their ability to negotiate on future contracts.

The payments for each outcome are commercially sensitive to the GLA because we'd be sharing information gained during procurement of the SIB on the contractual agreements of what providers were willing to pay for an outcome as per their bids for the SIB contract.

Section 43(2) constitutes a qualified exemption from our duty to disclose information under the FOIA and consideration must be given to whether the public interest favouring disclosure of the information covered by this exemption outweighs the public interest considerations favouring maintaining the exemption and withholding the information. In this instance we regard it not to be in the public interest to release information that would be likely to prejudice the way in which third parties negotiate with other funders.

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely


Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:
<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>