

GREATER LONDON AUTHORITY

[REDACTED]
(By email)

Our Ref: MGLA290519-3560

26 June 2019

Dear [REDACTED]

Thank you for your request for information which the GLA received on 28 May 2019. Your request has been dealt with under the Freedom of Information Act 2000.

You asked for;

1. *Any emails discussing GLA involvement in the Rough Sleeping Service Project*
2. *Any emails discussing use of CHAIN data for the purposes of the project*
3. *Any documents explaining the function and operation of the Rough Sleeping Service Project*
4. *Any data sharing agreements (or draft agreements under consideration) entered into to enable the functioning of Rough Sleeping Service Project*

Our response to your request is as follows:

Please find attached the information which we have identified as within scope of your request.

Please note that some names of members of staff are exempt from disclosure under s.40 (Personal information) of the Freedom of Information Act. This information could potentially identify specific employees and as such constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

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

Yours sincerely

Senior Project Officer (Rough Sleeping)

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>

[REDACTED]

From: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Sent: 18 December 2018 10:48
To: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: Home Office and Rough Sleepers

[REDACTED] and I will get back to you all shortly.

Deputy Manager of Home Office contribution to Rough Sleeping Strategy
Immigration Enforcement
E: [REDACTED]@homeoffice.gov.uk
Tel: [REDACTED]

From: [REDACTED] <[REDACTED]@communities.gov.uk>
Sent: 18 December 2018 10:47
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Home Office and Rough Sleepers

Hi [REDACTED],
Our team are at an away day this morning but I have picked up this email. We'll have a discussion about this at lunchtime and get back to you as soon as possible.
Best wishes,
[REDACTED]

Rough Sleeping | Homelessness Division | MHCLG

[REDACTED]@communities.gov.uk T: [REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 18 December 2018 09:43
To: [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: FW: Home Office and Rough Sleepers

Morning,
Just FYI – see below email from [REDACTED] (who as most you of know was instrumental in Judicial review of the previous Home Office) – he has heard about the new team and is asking for a description in writing of their remit. We need to ideally get back to him today or tomorrow (as otherwise he will start drawing his own conclusions) but this obviously needs very sensitive handling. Do you have anything in writing or even some lines that I get [REDACTED] in our social policy team to say to him on the phone (which would be my preferred option).
As I have mentioned at previous meetings I do think that to avoid any confusion there needs to be a clear line on what this team is and how it can help ensure that no one dies on the streets as without this the rumour is likely to cause bad press across the board.
I'm around this morning if it is easiest to chat on the phone.

Thanks

From: [REDACTED]
Sent: 18 December 2018 09:11
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: FW: Home Office and Rough Sleepers
Hi [REDACTED] and [REDACTED],
Do you know anything more about this? Can we have a quick chat this afternoon?
Best wishes,

[REDACTED]
[REDACTED]
Senior Policy Officer – Migration and Refugees
GREATER LONDON AUTHORITY
City Hall | The Queen's Walk | London | SE1 2AA |
Tel: [REDACTED]

From: [REDACTED] (Lambeth) <[REDACTED]@lambethlawcentre.org>
Sent: 18 December 2018 09:09
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: Home Office and Rough Sleepers

Hi [REDACTED],

I hope you are well and things are not too manic, as it normally goes at the end of the year.

I am writing to see if you have any information about this new Home Office team, worryingly headed by [REDACTED] (who was the lead for past enforcement operations), that is asking homelessness organisations to check entitlements and possibly refer to them.

I am concerned there doesn't seem to be anything in writing which sets out the remit of those teams, whether it is a development of the 'resolution' list, which had been sought by the GLA for many years or if it is the new face of enforcement. More critically, are these two safely separated for people who might require support.

I understand that what you can tell me is limited but I would really appreciate if you could give me some pointers, starting by the actual name of that team or anywhere I can find information.

Feel free to call me on my mobile if it is easier.

Many thanks,

[REDACTED]

[REDACTED] | [REDACTED]

[REDACTED]

Tel: [REDACTED] | Mob: [REDACTED] | Fax: [REDACTED]

[REDACTED]

Hold: RSSS roundtable follow-up

Dear all,

Please hold this time in your diaries for a follow-up to the Rough Sleeping Support Service roundtable. We will use it to look at two things:

1. The referral mechanism (information sharing)
2. The cohort of rough sleepers

More details to follow, including whether we secure a bigger room. I've added several colleagues to be aware. You are not all expected to come.

Best,

A small black rectangular box used to redact the sender's name or signature.

[REDACTED]

From: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Sent: 27 March 2019 13:43
To: [REDACTED]
Subject: RE: Hold: Rough Sleeping Support Service roundtable 2.0

I'm well thanks and trust you are the same.

I do hope you are able to make it work, although I understand the difficulty in juggling interviews. I had to do five in one day a few weeks back.

We will be discussing a proposal for the information sharing mechanism - I will likely arrange a short call with you in advance of the meeting to brief you a bit and allow you / a delegate to prepare.

Best,

[REDACTED]

[REDACTED]
Deputy Manager of Home Office contribution to Rough Sleeping Strategy Immigration Enforcement
E: [REDACTED]@homeoffice.gov.uk
Tel: [REDACTED]

-----Original Message-----

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 27 March 2019 13:16
To: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Subject: RE: Hold: Rough Sleeping Support Service roundtable 2.0

Hi [REDACTED],

Nothing swanky I'm afraid but I am due to be doing interviews that day for new member of the team - I currently have two days set aside for this so there is the possibility that I might not need both days so if that is the case then I will juggle my diary so that I can attend the roundtable follow up - so at the moment I will tentative respond to the meeting invitation but we will endeavour if I cannot make it to get someone there from the team.

Hope you're well.

Thanks

[REDACTED]

-----Original Message-----

From: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Sent: 27 March 2019 12:22
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: Re: Hold: Rough Sleeping Support Service roundtable 2.0

[REDACTED],

Are you still unable to make the 11th April for the the RSSS roundtable follow-up?

I seem to remember you had a swanky event of some kind that day.

Best,



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For more information please visit <http://www.symanteccloud.com>

[REDACTED]

From: [REDACTED]
Sent: 01 April 2019 17:44
To: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement)
Subject: RE: Pre-brief roundtable RSSS

Hi [REDACTED],

I'm afraid that I can't do tomorrow but I only have a meeting in the morning on Friday so shall we say 12.30 – obviously if there is anything you can send beforehand then please do send it through, and if you want to make it later on Friday just let us know I've got briefings to write on Friday so I was just making it earlier so I can concentrate on those but happy to have a distraction later in the afternoon if easier with you.

Thanks and speak on Friday

[REDACTED]

From: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement)
<[REDACTED]@homeoffice.gov.uk>
Sent: 01 April 2019 17:09
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: Pre-brief roundtable RSSS

[REDACTED],

In advance of the next RSSS roundtable, taking place next week, I'd like to brief you informally over the phone first. We have a proposal and I'd like to talk you through, how we got to it, why we've discounted other options, and give you the chance to think it through and test back at base before attending the roundtable. This will make it as productive as possible.

I'm free tomorrow (Tuesday 2nd) at 16.00 or Friday 5th after 12.00. Do you have any time available that would suit?

Many thanks,

[REDACTED]

[REDACTED]
Deputy Manager of Home Office contribution to Rough Sleeping Strategy
Immigration Enforcement
E: [REDACTED]@homeoffice.gov.uk
Tel: [REDACTED]

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[REDACTED]

From: [REDACTED]
Sent: 10 April 2019 14:21
To: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: FW: RSSS roundtable follow-up
Attachments: RSSS Roundtable 2.0 agenda.docx; RSSS roundtable 2.0 paper.docx

FYI,

As mentioned briefly the proposal from the Home Office is that RSSS works under 'public task' which I think will be pretty impossible but I will see what comes out of the meeting tomorrow and keep everyone in the loop.

Thanks

[REDACTED]

From: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement)
<[REDACTED]@homeoffice.gov.uk>
Sent: 10 April 2019 11:44
To: [REDACTED] <[REDACTED]@MUNGOS.ORG>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@MUNGOS.ORG>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@westminster.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@thamesreach.org.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@thamesreach.org.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@thamesreach.org.uk>; [REDACTED] <[REDACTED]@thamesreach.org.uk>
Subject: RSSS roundtable follow-up

Dear all,

Please find attached documents for the Rough Sleeping Support Service roundtable follow-up, this Thursday, 11th April, from 12.30 to 14.00 at 2 Marsham Street, to discuss an information sharing proposal. The first document is the agenda and the second is a brief background paper to tee up the discussion.

We do have very limited space in the meeting room and I am expecting the following to attend the meeting in person:

[REDACTED]

[REDACTED] / [REDACTED] (tentative)

If anyone else planned to intend the meeting, please let me know.

Many thanks,

[REDACTED]

[REDACTED]

Deputy Manager of Home Office contribution to Rough Sleeping Strategy

Immigration Enforcement

Vulnerability Champion

E: [REDACTED] [@homeoffice.gov.uk](mailto:[REDACTED]@homeoffice.gov.uk)

Tel: [REDACTED]

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Rough Sleeping Support Service Roundtable follow-up
Thursday 11 April 2019, 12.30 – 14.00
2 Marsham Street

Agenda

- | | |
|--|----------------------|
| 1. Introductions and objectives
[REDACTED] – MHCLG | 12.30 – 12.40 |
| 2. Overview of the issues
[REDACTED] – Home Office | 12.40 – 12.45 |
| 3. Information sharing proposal
[REDACTED] – Home Office | 12.45 – 13.05 |
| 4. Implications for service providers’
operational procedures
[REDACTED] – MHCLG | 13.05 – 13.20 |
| 5. Communication with stakeholders
[REDACTED] – MHCLG | 13.20 – 13.35 |
| 6. Next steps
[REDACTED] - MHCLG | 13.35 – 13.55 |

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Home Office Rough Sleeping Support Service Information sharing proposal

Background

1. The Home Office (HO) has setup the Rough Sleeping Support Service as part of its commitment to the Government's Rough Sleeping Strategy. The service provides a single point of contact for local authorities to receive rapid immigration status checks on non-UK national rough sleepers and prioritises support work on their cases within the immigration system to help resolve their immigration status issues.
2. HO has been working with stakeholders from local authorities and the third sector to develop an appropriate information sharing system that is GDPR-compliant.

The challenge

3. Service providers tend to use 'consent' as the legal basis for information sharing while HO uses 'public task' and these legal bases cannot be merged.
4. Some third sector service providers and local authorities received public criticism for working with HO in the past and the environment is sensitive.

The proposal

5. The information sharing proposal is for a system using the legal basis of 'public task.' This would involve local authorities, and their commissioned service providers, carrying out a specific task in the public interest which is laid down by the law. The task in question would be delivering immigration controls (and carrying out safeguarding responsibilities).

Alternative options considered

6. A system based on consent was explored and found to be unviable, with various challenges related to:
 - a. The ability of subjects to be able to withdraw their consent easily and the mechanics of that for rough sleepers;
 - b. What someone withdrawing their consent would mean for their case resolution especially if it related to, for example, an outcome they opposed;
 - c. The fact that HO processes data under public task and the challenges of trying to switch between two systems;
 - d. Overall risk, as well as technical challenges and costs.

Operational implications

7. Any information that was going to be shared with HO would need to be collected in the right way. For example, any information gathered under the legal basis of consent could not subsequently be shared.
8. At the point their data was gathered the subject would need to have access to the HO Privacy Information Notice (PIN) which explains how the data would be used and how their rights are affected.

Perception and transparency

9. A key consideration for local authorities and service providers would be perception and communicating what is being done, and why, transparently, which is also a key data protection principle.

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Key questions

10. Do the benefits of using the service on the basis of public task outweigh the challenges around justifying doing so to stakeholders and other interested parties?
11. Do the benefits of using the service on the basis of public task outweigh the challenges of making the necessary operational adjustments?

FAQs

Q: Can local authorities carry out a public task on behalf of the Home Office?

A: Yes.

Q: Can third sector organisations delivering a commissioned service for a local authority carry out a public task on behalf of the Home Office?

A: Yes.

Q: Could non-commissioned service providers use the same approach?

A: Yes. It is the task itself that is relevant, rather than how the organisation is operating/being funded.

Q: Could information already collected be shared with HO?

A: If information had been gathered using the basis of consent, then no. 'New' data would have to be gathered using the basis of public task.

RE: Rough Sleeping Support Service [REDACTED] <[REDACTED]@london.gov.uk>brief

Hi [REDACTED] and welcome [REDACTED],

Yes would be great to catch up and talk about CMF and all the other cross over bits that we have going on.

I had a meeting with [REDACTED], MHLCG and others today to talk a little more about the RSSS and the data sharing side of things and I think there is still a little bit more needed on this before they are in a position to talk about this more widely so if we can stand down the 7 May date that would be great.

This week is a little nuts I'm afraid but very happy to meet up in May so send us over some dates that work from your side (and it is Thursday already!)

One other thing our next No Nights Sleeping Rough taskforce is going to focus on Non-UK national rough sleepers and is scheduled for the 16 May at 9am – we would obviously like you to be there but I'm not sure on the etiquette of these things and whether I need to invite [REDACTED] as well as the meeting is chaired by James Murray as the deputy mayor so would be great to have your steer on this!

Thanks

[REDACTED]

From: [REDACTED]

Sent: 09 April 2019 14:34

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: FW: Rough Sleeping Support Service brief

Hi [REDACTED],

Hope all is well. Have you heard any more from [REDACTED] on the below, should we stand down 7th May date?

I wanted to introduce you to [REDACTED] who has recently joined our team on secondment from Project 17, an organisation that supports families with NRPF. It would be good to have a catch-up about the below and the Controlling Migration Fund programme, and can invite [REDACTED] along to introduce her properly so we can draw on her expertise!

I'm away until May after this week, but let me know when might work for you 😊

Best wishes,

[REDACTED]

[REDACTED]

[REDACTED] – Migration and Refugees

GREATER LONDON AUTHORITY

City Hall | The Queen's Walk | London | SE1 2AA |

Tel: [REDACTED]

RE: Rough Sleeping Support Service [REDACTED] <[REDACTED]@london.gov.uk>brief

From: [REDACTED]
Sent: 19 March 2019 13:17
To: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Rough Sleeping Support Service brief

Hi [REDACTED],

Thanks for the update. We've cancelled the hold for the April meeting now, so do let me know about May 7th if you would like to proceed with this engagement.

Best wishes,

[REDACTED]

[REDACTED]

Senior Policy Officer – Migration and Refugees

GREATER LONDON AUTHORITY

City Hall | The Queen's Walk | London | SE1 2AA |

Tel: [REDACTED]

From: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Sent: 19 March 2019 13:01
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Rough Sleeping Support Service brief

[REDACTED],

I have a meeting with colleagues this afternoon about the Rough Sleeping Support Service and how we're moving forward. I'll be back in touch after that.

Best,

[REDACTED]

[REDACTED]

Deputy Manager of Home Office contribution to Rough Sleeping Strategy Immigration Enforcement

E: [REDACTED]@homeoffice.gov.uk

Tel: [REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 13 March 2019 11:26
To: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>

RE: Rough Sleeping Support Service [REDACTED] [REDACTED]@london.gov.uk>brief

Cc: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Rough Sleeping Support Service brief

Hi [REDACTED],

I hope you're well, just checking whether you'd like to proceed with the May 7th date?

Best wishes,

[REDACTED]

[REDACTED]

Senior Policy Officer – Migration and Refugees

GREATER LONDON AUTHORITY

City Hall | The Queen's Walk | London | SE1 2AA |

Tel: [REDACTED]

From: [REDACTED]

Sent: 05 March 2019 17:14

To: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Rough Sleeping Support Service brief

Hi [REDACTED],

No problem. [REDACTED] (and conscious of the Easter holidays limiting other's availability), can look into options but my preference would be to be there to help facilitate the discussion.

Our other option is 7th May, 3.30 – 5.30. Let me know your preference.

Best wishes,

[REDACTED]

[REDACTED]

Senior Policy Officer – Migration and Refugees

GREATER LONDON AUTHORITY

City Hall | The Queen's Walk | London | SE1 2AA |

Tel: [REDACTED]

From: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>

Sent: 05 March 2019 16:11

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Rough Sleeping Support Service brief

Dear [REDACTED],

RE: Rough Sleeping Support Service [REDACTED] <[REDACTED]@london.gov.uk>brief

Many thanks for getting back to me. We have actually had to postpone our own roundtable on the Rough Sleeping Support Service so it might be that aiming for a May date suits better after all. Is there absolutely nothing in the middle/end of April?

Best,

[REDACTED]

[REDACTED]
Deputy Manager of Home Office contribution to Rough Sleeping Strategy
Immigration Enforcement
E: [REDACTED]@homeoffice.gov.uk
Tel: [REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 05 March 2019 16:07
To: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Rough Sleeping Support Service brief

Hi [REDACTED],

Thanks for this, and good to meet you to discuss how the strategic migration partnership can support your engagement with local stakeholders through the Migrant and Refugee Advisory Panel (MRAP).

I've now had the chance to have some further conversations and we're happy to facilitate this. We're extremely tight on space, and only have capacity 10.00 – 12.30 on 8th April at the moment – otherwise, we're looking at May. Can the 8th be made to work?

Best wishes,

[REDACTED]

[REDACTED]
[REDACTED] – Migration and Refugees

GREATER LONDON AUTHORITY
City Hall | The Queen's Walk | London | SE1 2AA |
Tel: [REDACTED]

From: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Sent: 18 February 2019 23:55
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: Rough Sleeping Support Service brief

Dear [REDACTED],

Thanks for meeting with me the other day to discuss the Rough Sleeping Support Service and the potential for a GLA-hosted roundtable with key stakeholders. Please find below both a description of the Rough Sleeping Support Service and progress to date, plus an outline of what we would expect to get out of a GLA-hosted roundtable.

Rough Sleeping Support Service

In the Government's [Rough Sleeping Strategy](#) (p. 10) the Home Office committed to setup the Rough Sleeping Support Service (RSSS). In the Strategy this discussed prioritising support work to resolve immigration status problems and having a single point of contact for immigration status checks.

The RSSS allows local authorities (and we hope service providers) to refer a non-UK national rough sleeper (mainly non-EEA) to a single point of contact for an immigration status check. This information is provided within 24 hours, allowing the authority / service provider to assess the individual's entitlements. My RSSS team follows up by prioritising support work within the Home Office to help resolve the individual's immigration status problems. We hope this speeds things up, where possible. My team then makes stronger links between the relevant Home Office teams and partners on the ground to ensure the individual is supported, where possible. For example, seeing if a local authority can provide shelter for a week or two while somebody waits to voluntarily depart, or an outreach worker accompanying someone to a redocumentation meeting. This should help avoid people falling through the cracks. The RSSS has a monitoring/linking/brokering role. It provides status checks; prioritises work on cases; and forms links with partners on the ground.

We expect this will have significant impact on those wishing to return voluntarily or who have leave to remain in the UK and need to prove it. This is not an enforcement-focused approach but we are very open about the fact that in some cases that will be the final outcome. It focuses on non-EEA nationals who tend to have immigration status problems in a way that EEA nationals do not.

In terms of structure, the RSSS team sits in a slightly odd place alongside other HO teams with dotted lines into all of them on the organogram (terrible civil service jargon but I'm sure your GLA minds get the picture). The model of referrals coming through local authorities had been designed to create a bit of a buffer between HO and charities (in the context of sensitivities and past criticism) and because there is an existing statutory relationship between HO and authorities. However, I would be happy to flex on this and have service providers be involved in referrals directly.

Progress

We had hoped that we could adapt and extend an old information sharing arrangement that existed for the No Second Night Out programme, but that proved not to be possible. It is important that we have a formal, legal basis for any information sharing and to that end we have been working to develop an information sharing protocol that could exist between the Home Office and authorities / service providers. We have carried out a lot of informal engagement with key partners (e.g. authorities with large numbers such as Westminster, and service providers with significant coverage, such as St Mungo's).

There have been discussions around the encounter/referral part of the process, covering exactly how the referral is made. There is a desire in the sector to have a consent/permission/understanding element to it on the part of the rough sleeper. This has to be balanced with how HO processes information according to GDPR. This is a key part of the discussion and I am awaiting formal legal advice on the question in the next couple of days.

RE: Rough Sleeping Support Service [REDACTED] <[REDACTED]@london.gov.uk>brief

We will have a roundtable on 6th March that [REDACTED] will be invited to with a range of other stakeholders where we will likely go through a draft protocol and explore the options for the encounter/referral stage of the process, based on what lawyers advise.

A key concern is around transparency.

Without the information sharing arrangement we have not been receiving the flow of referrals that we would like. We have, in the meantime, been operating a test phase using smaller numbers of referrals, mostly from other HO teams and on a case-by-case basis.

What do we want from a GLA-hosted roundtable?

A roundtable hosted by the GLA with key stakeholders would allow us to have a structured discussion about the Rough Sleeping Support Service, including the principles, process and intended outcomes. It would also provide an opportunity to have a discussion with a consultative element around making the process work in practice, noting the interests and expertise of relevant stakeholders. Further, we are keen that we are transparent about the service and that those in the rough sleeping and migrant sectors have a clear and proper understanding of how the service will work and what it will achieve.

Timings

Consideration of when would be best to have such an event depends partly on how the next couple of weeks go in terms of legal advice and the follow-up roundtable. However, there is time pressure to make progress so it would be my preference not to delay too long.

Happy to help with any follow-up questions and to liaise with you to help plan a roundtable.

Kind regards,

[REDACTED]

[REDACTED]
Deputy Manager of Home Office contribution to Rough Sleeping Strategy
Immigration Enforcement
E: [REDACTED]@homeoffice.gov.uk
Tel: [REDACTED]

Minutes

Title of meeting	Rough Sleeping Support Service (RSSS) Roundtable Follow-up		
Date	11 th April 2019	Time	12:00
Venue	2 Marsham Street		
Chair	[REDACTED]	Secretary	[REDACTED] [REDACTED]
		Copies to	All

Attendees

[REDACTED] (HO); [REDACTED] (HO); [REDACTED] (GLA); [REDACTED] (HO); [REDACTED] (MHCLG); [REDACTED] (MHCLG); [REDACTED] (MHCLG); [REDACTED] (St Mungo's); [REDACTED] (MHCLG); [REDACTED] (WCC) [REDACTED] (St Mungo's)

Apologies: [REDACTED] (Thames Reach)

Process

- The Home Office explained why they could not use consent as the legal basis for information sharing. Essentially, consent would be too much of a divergence from existing policy and would pose a series of risks to the wider system.
- The legal basis of public task was explained. There were no legal issues with it being used by local authorities and commissioned service providers. This was the basis of existing arrangements. There would need to be consideration for issues of operational mechanics and perception.
 - **Action:** The group agreed the public task proposal would be developed.
- There was a request for clarity about when the process of data collection would start and whether there would be any obligation to share it with the Home Office once the privacy notice had been displayed and the information collected.
 - **Action:** [REDACTED] agreed to clarify when the data collection would start.
- The process of service provider staff engagements with rough sleepers was explained: first, there was an initial conversation between the support/outreach workers and clients where data was collected on the basis of public task, using a privacy notice; if the case required Office of the immigration Services Commissioner (OISC) support, they would be referred to an OISC adviser; data collected by the OISC adviser was collected on the basis of consent.
- St Mungo's/Praxis clients already had cases with the Home Office that were being supported through Street Legal. There were believed to be in the region of 40 cases. One of the most significant barriers was getting access to immigration records through subject access requests. The RSSS was committed to a service standard of providing an immigration status check in 24 hours. This would allow meaningful progress to be made in some cases. It was believed referrals to RSSS could be made given Praxis had already shared data with (other parts of) the Home Office, in effect duplicating what had been done already and allowing the RSSS to identify those cases as rough sleeper and prioritise support work on them.

- **Action:** [REDACTED] agreed to speak to Praxis with a view to sharing ten cases with RSSS, of a range of difficulty/types, to provide test cases for the referrals process and service.
- Subject Access Requests were discussed. The current arrangements were taking about three months on average and this was generally agreed as unsatisfactory. The main difficulty was resourcing of the unit providing this service. It was not likely that there would be improvements in the short term.
- There was a general discussion about the provision of immigration advice and levels of OISC training.
- Processes involving just the local authority and not service providers were discussed. This would potentially be transferrable to other authorities, but not all, depending on how they were setup and operated.

Action: [REDACTED] would share St Mungo's process map for HO to adapt for RSSS.

Workforce

- The limits of OISC-trained workforce, even in London, were discussed. Current capacity is only adequate. Outside of London, the situation was strained because of lack of resources.
- The differences in workforces (and potentially processes) across the country were discussed.

Communications and stakeholder management

- The GLA emphasised the need to have transparency; a written process map and outline of the purpose of the RSSS for internal consideration would be helpful.
- There had already been engagement with the migrant rights sector; Home Office had had positive meetings with Praxis and RAMFEL. The RSSS was discussed on a regular basis and there should be a growing understanding of its role.
- It was agreed that the Home Office would present the service at the GLA's No Nights Sleeping Rough Task Force on 16 May.
 - **Action:** Home Office would identify a Home Office attendee for this meeting.
 - **Action:** [REDACTED] would share timings for papers, agenda and cast list with Daniel.
 - **Action:** [REDACTED] would find a date up to a week before 16 May (not 9 May) for the group to reconvene and clear materials.
- **Action:** [REDACTED] would share some RSSS case studies with the group.

Products for 16 May meeting

- Purpose/aims of RSSS document
- Process map
- Privacy information notice
- Timeline for delivering key milestones
 - **Action:** [REDACTED] would draft, with support from [REDACTED] (MHCLG) on the timeline development and process map.

AOB

- The EU Settlement Scheme and the fund to support vulnerable groups was due to be rolled out.

[REDACTED]

From: [REDACTED]
Sent: 07 May 2019 09:16
To: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement)
Cc: [REDACTED]
Subject: RE: No Night Sleeping Rough taskforce invitation

Thanks [REDACTED],

I have just forwarded through the invitation to you all now so hopefully this has made it through (let me know if not – it will come from [REDACTED] forwarded by me as she sends out the meeting requests).

Obviously we would be very happy to be involved in a trilateral meeting if this can be arranged prior to the meeting on the 16th and I have spoken to [REDACTED] and his PA [REDACTED] about making this priority if MHCLG do get in touch but if not I will have briefed [REDACTED] as much as I can on this and if we are in position to have an agreed process map and any documentation prior to the meeting this will really help in taking [REDACTED] through it all. I do think that being able to have this discussion in a wider forum should hopefully be really helpful in us building on the momentum that we have already achieved.

Thanks
[REDACTED]

From: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement)
<[REDACTED]@homeoffice.gov.uk>
Sent: 01 May 2019 14:06
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@homeoffice.gov.uk>
Subject: RE: No Night Sleeping Rough taskforce invitation

Dear [REDACTED],

Many thanks for sending this through in good time.

We will provide a more concrete confirmation nearer the time but would expect [REDACTED] <[REDACTED]@homeoffice.gov.uk>, our Policy senior civil servant, to attend, most likely with support from [REDACTED]. Please could you forward the calendar invitation to her and [REDACTED] and me? I don't think we have received it.

We will do all of the appropriate preparation in advance and as you are aware, the roundtable group will reconvene on Wednesday 8th to clear materials, e.g. process map, and discuss the approach.

There has been discussion about a trilateral meeting between the Deputy Mayor, our Director of Crime and Enforcement and the MHCLG Director. MHCLG should lead on pulling that together and it could help prepare the Deputy Mayor for the 16th if it can be arranged in time. If they don't meet then I imagine the briefing will be all down to you. More than happy to talk through anything over the phone before the meeting. You play a critical role in this and I recognise the forces you are balancing. But it feels like we have made real progress, had a breakthrough with the public task discussion, and need to maintain momentum to reach resolution and enable the RSSS to be utilised to resolve the non-EEA national rough sleepers' situations. It was never going to be completely smooth sailing but feels like it is far closer than it has been before and other developments, such as RAMFEL in Redbridge referring five 'test' cases to us, reflects a really positive direction of travel.

Best,
[REDACTED]

[REDACTED]
Deputy Manager of Home Office contribution to Rough Sleeping Strategy
Immigration Enforcement
Vulnerability Champion
E: [REDACTED] [@homeoffice.gov.uk](mailto:[REDACTED]@homeoffice.gov.uk)
Tel: [REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 25 April 2019 16:04
To: [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Subject: No Night Sleeping Rough taskforce invitation

Hi [REDACTED] and [REDACTED],

Hope you guys are both well.

I just wanted to write more formally to invite the home office to the next NNSR taskforce which takes place on 16 May at 9am in Union Street and I have sent over a meeting request. As mentioned when we spoke the focus of this meeting is on Non-UK rough sleepers. I have attached the terms of reference for the meeting as well as the previous minutes so that you can get a flavour of the meeting, if you would like more information on the meeting this is available on the website here:

<https://www.london.gov.uk/what-we-do/housing-and-land/homelessness/no-nights-sleeping-rough-taskforce>

As previously mentioned I wondered if you would be in a position to present a paper on the RSSS or perhaps do a short presentation on this work so that everyone around the table is up to speed on where this has got to – at present I have this on the agenda item 3. There will also be a wider discussion on the challenges that we currently have working with the group and looking at the way forward. The group is chaired by James Murray and has senior buy in from those that attend the meeting so if you can let us know who in addition to yourself (as I know that [REDACTED] is on leave so not able to attend) should come from your side that would be great.

If you need any further detail on this please don't hesitate to contact me.

Thanks

[REDACTED]

[REDACTED]

Rough Sleeping Lead Manager, Housing & Land
GREATERLONDONAUTHORITY
169 Union Street, London SE1 0LL

[REDACTED] | [REDACTED]

london.gov.uk
[REDACTED] [@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

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[REDACTED]

From: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Sent: 08 May 2019 16:38
To: [REDACTED]; [REDACTED]@thamesreach.org.uk; [REDACTED]@thamesreach.org.uk'; [REDACTED]; WCC; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: [RSSS group] FW: Referrals to the RSSS

All,

Please see forwarded email with Praxis concerns about RSSS, shared via [REDACTED].

Best,

[REDACTED]

[REDACTED]
Deputy Manager of Home Office contribution to Rough Sleeping Strategy
Immigration Enforcement
Vulnerability Champion
E: [REDACTED]@homeoffice.gov.uk
Tel: [REDACTED]

From: [REDACTED] <[REDACTED]@MUNGOS.ORG>
Sent: 03 May 2019 15:45
To: [REDACTED] <[REDACTED]@MUNGOS.ORG>; [REDACTED]@communities.gov.uk; [REDACTED]
(Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement)
<[REDACTED]@homeoffice.gov.uk>
Subject: Referrals to the RSSS

Hi, following our meeting I promised to go away and do what I could to get referrals to the team. I have tried really hard in discussion with the CEO of Praxis and with their OISC registered advisers. In short they still have a number of concerns. I won't translate these, they are pasted to the bottom of my email. While this is not great news perhaps the RSSS is able to respond to some or even all of their concerns and this could move things along. Daniel I know you offered to speak directly with them but I think in the first instance we should put something in writing if that's possible? Some of their feedback is helpful as I would imagine this reflects the wider view of the sector. however I also feel some you have already addressed in your earlier email to me.
Let me know what your thoughts are.

Praxis feedback

- Even though the HO does not have a client's address, when an application is submitted it is often at that point that the client comes back onto the HO radar and is asked to report regularly. A client must report when asked or risk being labelled an immigration offender. They can then potentially be detained and removed at any one of these reporting appointments. It is unclear if a referral to the RSSS would make this more likely.
- For clients with submitted applications – we don't know who their application will be brought to the attention of if they are raised with the RSSS service and with what purpose while at least if the cases remain within the casework team who deals with the case we know that they will be dealt with in the standard way;
- The quality of Home Office decision making even for relatively straightforward cases is not good. The cases we

deal with through Street Legal in general are of a very high level of complexity and there is a concern that a 'speedy' decision is more likely to turn out to be a poorly-made decision which will leave the client in a position of needing to make an appeal or refused a right of appeal. At that point the client may not be able to progress and unless the Home Office remove them (removal rates are very low) they will remain on the street with even less prospect of success than previously;

- Many clients are extremely anxious about contact with the Home Office and very mistrustful. Any indication of a close contact with the Home Office could lead to them disengaging with us, so we need to be very confident of what will happen to cases.
- Our meetings with the RSSS have not been successful in clarifying the role of the RSSS or the policies and procedures that they are working to. As such it is very difficult for us to advise clients effectively of what the possible outcome might be of a referral. If it turned out that those refused were to be immediately detained for example, we wouldn't know that;
- From what we have seen there are no immigration decision makers in the RSSS, just immigration officers. There has been a lot written about culture embedded within UKVI and it is likely that immigration officers sitting within the enforcement team see their role as enforcement.
- Verbal assurances that this is not the case are not sufficient and given the risk to the client and the reputational risk for both Praxis and St Mungos this has to be taken seriously. Any written materials to clarify the role and aims of the RSSS must also include the internal guidance used in the RSSS for dealing with cases (as is standard for any UKVI team).

If the HO wants to expedite rough sleeping cases, it doesn't need a special team (sitting within the enforcement unit) to do so. All it needs to do is to introduce a UKVI policy stating that if a client is identified as a rough sleeper by a recognised agency then the case will be expedited (within the team where it already sits, and subject to my previous caution with regard to rushed decisions being poor decisions). I believe that they already say somewhere in policy that they will expedite cases where clients are destitute, so why don't they just actually do that?

Thanks,

██████████, sent on the move.

Director of Rough Sleeper, Offender and Migrants Services at St Mungos

Mobile: ██████████

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[REDACTED]

From: [REDACTED]
Sent: 09 May 2019 16:55
To: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement)
Cc: [REDACTED]
Subject: RE: Info

Not a problem – I'm due to agree the agenda with [REDACTED] tomorrow so will send the invitation on to [REDACTED] and cc: in [REDACTED] and [REDACTED] (as I know your off from tomorrow [REDACTED]) after this. Thanks [REDACTED]

From: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement)
<[REDACTED]@homeoffice.gov.uk>
Sent: 09 May 2019 16:38
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@homeoffice.gov.uk>
Subject: RE: Info

One extra thing, [REDACTED], please could you also send a 'formal' invitation for the 16th May to [REDACTED], including agenda and expected attendees. I assume this will be the same as what you shared with me and [REDACTED] before but it would be good to 'formally' go from you to [REDACTED].

[REDACTED] is our Director (operational side) and [REDACTED] is his [REDACTED]. It isn't confirmed whether he can attend yet – we'll have a better idea next week.

[REDACTED] <[REDACTED]@homeoffice.gov.uk>
[REDACTED] <[REDACTED]@homeoffice.gov.uk>

Many thanks,

[REDACTED]

[REDACTED]
Deputy Manager of Home Office contribution to Rough Sleeping Strategy
Immigration Enforcement
Vulnerability Champion
E: [REDACTED] <[REDACTED]@homeoffice.gov.uk>
Tel: [REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 09 May 2019 13:39
To: [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Subject: RE: Info

Thanks [REDACTED], this is helpful. I will include the info on the below to James when I meet with him. Thanks [REDACTED]

From: [REDACTED] <[REDACTED]@homeoffice.gov.uk>
Sent: 09 May 2019 12:59
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Subject: RE: Info

[REDACTED],

You will remember that our intention was that [REDACTED], our director of enforcement and [REDACTED] would meet the duty Mayor and brief him on the policy context in which we are operating. This is particularly important for Immigration Enforcement in relation to our Vulnerability Strategy and our overarching business plan, both of which are under development following the Home Secretary's directions. Consequently we cannot share a complete document as there isn't one but the general thrust of the approach is to recognise vulnerability, take the right decisions in all the circumstances and ensure we have the capacity to address safeguarding needs.

It is intended that there will be changes in our overall approach, that staff will be equipped to recognise vulnerability and, alongside this, the organization will build capacity to address vulnerability and develop safeguarding measures throughout the case management process.

Clearly, foreign national rough-sleepers will fit into this approach both in terms of a category which is inherently vulnerable but also as individuals who are likely to need special attention on a case by case basis. Wherever individuals are required to return to their home country we will aim to make that a voluntary arrangement whenever possible. We are working on a number of initiatives to improve the offer in relation to voluntary returns; there may be something we can look at in terms of the experience that practitioners who deliver reconnections can bring into that discussion.

[REDACTED] would have provided some insight into these developments, given that we have missed the opportunity to do this before 16th May, it would be useful if you could include this in your briefing. We will be talking in these terms then but it would be useful for the Chair to understand broader context beforehand. We want there to some recognition that things are changing.

Finally, in addition you will know that under the EU Settlement Scheme funding has been provided to deal with those who are vulnerable to ensure that they can avail of the Scheme. Funding has been provided specifically to provide support for EU rough-sleepers in London and elsewhere. We are close to making announcements and seeing the roll-out of services.

Regards,

[REDACTED]

Immigration Enforcement
Home Office

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 09 May 2019 10:48
To: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement)
<[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>
Subject: RE: Info

Thanks for sharing this and totally agree that a high level overview is the best approach for the meeting itself – I'm viewing it as an opportunity to get Crisis and Homeless Link and boroughs onside with the overall approach..

Thanks
[REDACTED]

From: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement)
<[REDACTED]@homeoffice.gov.uk>
Sent: 09 May 2019 10:40
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>
Subject: RE: Info

Good to see you too, [REDACTED], and thanks for your contributions.

Happy to share both for the purpose of you briefing the Deputy Mayor, with all of the caveats that we are making a number of changes based on the meeting yesterday, and not to be shared more widely. See attached.

You can judge how much detail you will go into but our plan is not to get dragged into all of the detail on the 16th, partly because it's the wrong forum, there are a few stakeholders who won't be familiar, and we don't have two hours for our agenda item! [REDACTED] will likely provide a high-level overview, outline where we have got to, set out the process and take a few questions.

Best,
[REDACTED]

[REDACTED]
Deputy Manager of Home Office contribution to Rough Sleeping Strategy
Immigration Enforcement
Vulnerability Champion
E: [REDACTED]@homeoffice.gov.uk
Tel: [REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 09 May 2019 10:28
To: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement)
<[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>
Subject: Info

Good to see you both yesterday,

I'm meeting [REDACTED] tomorrow morning and I know that one thing he will want to be briefed on is the taskforce meeting next week and I want to give him as full briefing on the RSSS as possible, I know that the diagram and the paper that you gave out at the meeting are going to be updated but I wondered if it possible for you to send me over copies of this as the one that I have is now currently covered in scribbles and I think it would be helpful for me to talk him through this using this as a bit of a template. Obviously it goes without saying that I will talk him through this document only and will not be sharing it more widely and totally understand if this can't be shared at this time.

Thanks

Rough Sleeping Lead Manager, Housing & Land

GREATERLONDONAUTHORITY

169 Union Street, London SE1 0LL

london.gov.uk

[\[REDACTED\]@london.gov.uk](mailto: [REDACTED]@london.gov.uk)

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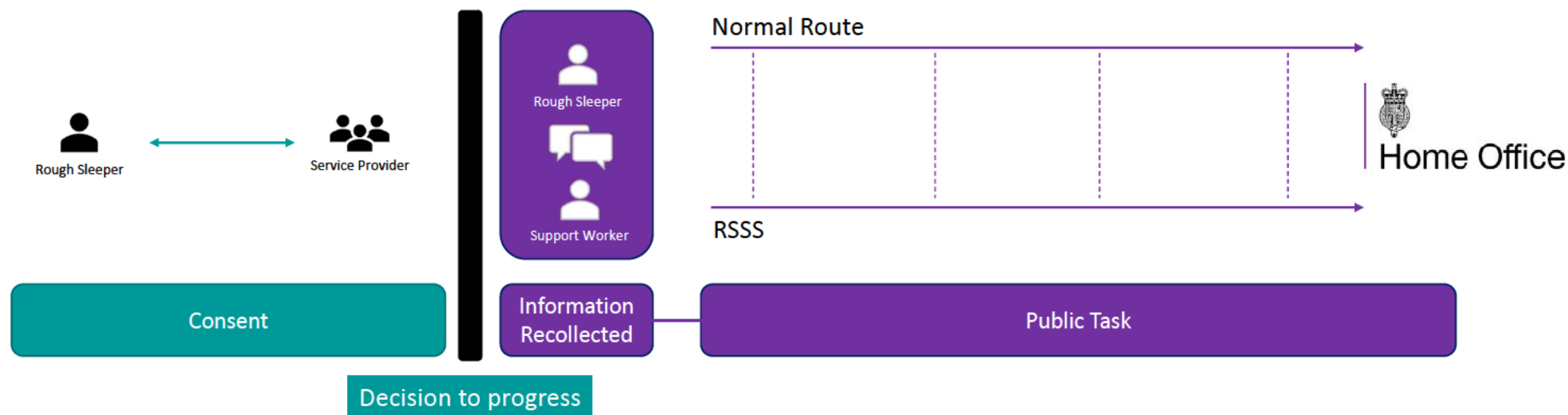
Home Office



Ministry of Housing,
Communities &
Local Government

Rough Sleeping Support Service Information Map – Public Task

Rough Sleeping Pathway



The initial rough sleeper-support worker engagement would remain separate from Home Office processes. It could be decided that a referral to the RSSS was not required and either a 'normal' route application should be made, or no action taken at all.

Home Office will not receive information at this point, including from CHAIN (which it will not have access to at any point).

It is likely that an initial conversation(s) would take place between the support worker and rough sleeper to ascertain some basic details. Information from that conversation would not be shared with the Home Office, given it would likely have been collected on the basis of consent. Data collection would not have started at this point.

A support worker would have the same conversation again with a rough sleeper, explaining at the beginning that information gathered during the conversation could be shared with the Home Office for the purposes of helping resolve their status. This could include proving the right to remain, granting the right to remain, completing a voluntary return or enforced return.

The Home Office privacy information notice – or a bespoke version for the RSSS – would need to be shown to the rough sleeper and the potential outcomes explained clearly.

This conversation is a fundamental element in the public task – not consent – process, with data collection for public task only beginning once the 'new' conversation starts. During this conversation the individual will be required to provide their information, which may already be 'known' including their name, date of birth and Home Office reference number (if possible).

RSSS

Once the information had been provided, the support worker would share very basic details with the RSSS: the individual's name and date of birth, plus HO reference number (if they had it). We would ensure only the minimum information needed for the RSSS process was provided.

If a referral was made to RSSS an immigration status check would be provided within 24 hours. This information would help establish status and help support workers and rough sleepers decide about their options. If there was an ongoing case, work on it would be prioritised.

It is likely organisations would want to make an RSSS referral both for the snapshot status check and prioritisation of work on cases.

RSSS route - A snapshot immigration status check would be provided within 24 hours of a referral into the RSSS, enabling the referrer and the rough sleeper to assess their status and entitlements. The initial status check would also enable the referrer and rough sleeper to decide whether they should pursue a subject access request – which provides all the personal information on the data subject held on HO systems – and submit an application or appeal. This would likely involve legal advice.

vs.

Normal route -

Organisations and rough sleepers could still opt not to use the RSSS and follow their usual processes, including having initial conversations, seeking legal advice, submitting subject access requests and submitting applications. The RSSS process, whether used or not, would not prejudice that. It would only interact with the 'normal' route by providing a faster initial status check and prioritising work on cases (including those with outstanding applications).

Interactions -

When referrals are made to RSSS there are interactions with the 'normal' processes. For example, if an individual has an outstanding asylum claim then RSSS would not take the case away from the asylum team, rather they would ensure it was prioritised. RSSS is not a new process, rather it supports the existing system.

OFFICIAL



Rough Sleeping Support Service Purpose

Background

1. In the Government's Rough Sleeping Strategy, published in August 2018, one of the measures described was the Rough Sleeping Support Service (RSSS).

Process overview

2. The RSSS provides a national single point of contact for local authorities, and service providers, to receive rapid immigration status checks on non-UK national (primarily non-EEA national) rough sleepers. The team then prioritises support work to help resolve their immigration status issues.

Purpose

3. The overall aim is to reduce the number of non-UK nationals sleeping rough. It provides a dedicated team to help 'navigate' rough sleeper cases through the immigration system, which can sometimes appear opaque and complicated.
4. Resolving rough sleepers' status could include individuals proving their leave to remain and entitlements; being granted leave to remain; completing a voluntary return (with financial assistance); and enforced removal. It is not an enforcement-focused approach, but we are clear that enforcement could be an outcome for some rough sleepers.

[REDACTED]

From: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Sent: 28 May 2019 21:16
To: [REDACTED]
Subject: RE: Agenda for No Nights Sleeping Rough taskforce 16 May 2019 at 9am

Hi [REDACTED],

I'm not sure if you were able to take this any further but it might be best for us to pause on sending it to MRAP for now. I want to have a catch-up with colleagues at HO and MHCLG about how best to take the RSSS proposal forward, including in terms of MRAP.

Please bear with.

Kind regards,

[REDACTED]

[REDACTED]
Deputy Manager of Home Office contribution to Rough Sleeping Strategy
Immigration Enforcement
Vulnerability Champion
E: [REDACTED]@homeoffice.gov.uk
Tel: [REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 21 May 2019 11:13
To: [REDACTED] <[REDACTED]@homeoffice.gov.uk>
Cc: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Subject: RE: Agenda for No Nights Sleeping Rough taskforce 16 May 2019 at 9am

Hi [REDACTED],

Of course, happy to send the taskforce. In relation to MRAP is there a short paragraph that we could send out at the same time in terms of some background on this as obviously this group will not be as up to speed on this area.

Thanks

[REDACTED]

From: [REDACTED] <[REDACTED]@homeoffice.gov.uk>
Sent: 19 May 2019 22:46
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Subject: FW: Agenda for No Nights Sleeping Rough taskforce 16 May 2019 at 9am

[REDACTED], would you be able to circulate the RSSS process map to the participants at the meeting, and to MRAP?

Thanks,

[REDACTED]

Immigration Enforcement
Home Office

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 10 May 2019 16:17

Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>

Subject: Agenda for No Nights Sleeping Rough taskforce 16 May 2019 at 9am

Dear All,

Please find attached the agenda for the NNSR taskforce meeting which is taking place next Thursday (16 May) at 9am, as previously agreed this meeting will focus on Non-UK national rough sleepers. Presentations will be given at the meeting and there are no prior papers.

Any questions prior to the meeting please do contact myself or another member of the team.

Many thanks

[REDACTED]

[REDACTED] | Housing & Land
GREATER LONDON AUTHORITY, 169 Union Street, London, SE1 0LL
T: [REDACTED] M: [REDACTED]

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[REDACTED]

From: [REDACTED]
Sent: 11 January 2019 12:41
To: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: FW: RSSS Roundtable Event
Attachments: RSSS Engagement Event - Outline of discussion points.docx

Obviously I have said that we will be attending this – but it would be good to have a quick chat about this to make sure that we come up with any of the additional issues to feed into this as possible I'll also have a chat with [REDACTED] from migration team to try and as best as possible cover off their side of things – I think the main sticking point on this is the transparency and informed consent which they are both acknowledging.

Thanks [REDACTED]

From: [REDACTED] <[REDACTED]@communities.gov.uk>
Sent: 09 January 2019 12:30
Cc: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement)
<[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED]
<[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED]
<[REDACTED]@homeoffice.gov.uk>
Subject: RSSS Roundtable Event

Good Afternoon All,

I would like to invite you, as experts with significant experience of tackling rough sleeping by non-UK nationals to a Roundtable event co-chaired by the Ministry of Housing, Communities and Local Government and the Home Office to discuss and seek your views on the new Rough Sleeping Support Service (RSSS).

The Roundtable will take place at 1pm-4pm (it may not take the full 3 hours) on the 25th of January at BEIS conference Centre, 1 Victoria Street, London, SW1H 0ET.

The RSSS has been setup as part of Home Office's commitment to the Cross-Government Rough Sleeping Strategy and in response to an identified need. It allows local authorities to utilise the National Command and Control Unit (NCCU) to receive real-time immigration status checks on rough sleepers; the RSSS will then be able to prioritise support work to help resolve the immigration status of those rough sleepers.

Further details of the service and the issues we wish to discuss are attached to this email.

A full agenda will be circulated closer to the meeting, however I thought it would be helpful to send an invitation to you all today to gauge your interest and give as much notice as possible.

I would be grateful if you would be able to confirm whether you will be able to attend the event by emailing [REDACTED] [@communities.gov.uk](mailto:[REDACTED]@communities.gov.uk)

All the best,
[REDACTED]

[REDACTED]
Deputy Director, Homelessness and Rough Sleeping Delivery
Homelessness, Leasehold and Renting Directorate
Ministry of Housing, Communities & Local Government
3rd Floor NW | Fry Building | 2 Marsham Street | London | SW1P 4DF

E: [REDACTED] | **T:** [REDACTED]

Rough Sleeping Support Service

Guide and overview of issues for the Roundtable

Guide to RSSS

1. The Rough Sleeping Support Service (RSSS) has been set up as part of the Home Office's commitment to the Rough Sleeping Strategy and in response to an identified need. It allows local authorities (LAs) to utilise the National Command and Control Unit (NCCU) to receive real-time immigration status checks on rough sleepers, with their consent. The LA can refer details of an individual to the NCCU which will provide an immigration status update to the LA, copying the RSSS team.
2. Being accurately informed of an individual's immigration status will then allow the LA to know what benefits and services that individual is entitled to and begin the most appropriate course of action. The RSSS may, for example, arrange for contact to be made with relevant caseworkers or immigration documentation to be replaced.
3. In cases where an individual's immigration status is unresolved, the RSSS team prioritises support work to help resolve their immigration status and end their rough sleeping.
4. This is not intended to be a direct enforcement approach and instead focuses on improving information sharing and problem solving. There are a range of potential outcomes for rough sleepers which will depend on the type of case and vary on a case-by-case basis. It is expected that this will have most significant impact on those who are lawfully in the UK but cannot prove it and those wishing to return to their home country voluntarily.
5. The RSSS is staffed and other parts of the Home Office have been made operationally ready for the service rollout. Informal conversations about its operation have been held with London partners but formal communications to the sector about the service have not yet been sent. There are three key challenges:

Overview of the issues

6. **Informed consent:** for an organisation to make a referral to the RSSS this needs to be done on the basis of informed consent. For individuals to give informed consent they must fully understand the implications of doing so, including the potential outcomes.

We recognise that some organisations which we would like to make referrals into this service are concerned that they may be vulnerable to legal challenge as well as representational damage. This is particularly sensitive given the recent commencement of GDPR.

To mitigate this risk we would like to develop a GDPR-compliant agreement between provider and the Home Office about information sharing, ensuring they are acting within the confines of the law.

7. **Referrals:** In the past, providers could make referrals straight to the NCCU; the No Second Night Out service in London utilised this approach. However, given the issues and the GDPR it is proposed that referrals come from the

local authority. As local authorities don't currently have the staff (or 24-hour service) to manage this there is a concern about effectiveness, resourcing and timeliness. Early discussions on this subject suggest this could potentially be resolved by delegating responsibility for referrals through a contract variation with commissioned providers.

8. **Transparency:** ultimately this new system will help resolve the cases of non-UK national rough sleepers and help them off the street. However, given the sensitivity of the issue it is important we are open and transparent about the service. It is also important that we are open about how the process will operate and what outcomes might be generated from it. It is important that those organisations making referrals can justify it to their stakeholders.

[REDACTED]

From: [REDACTED] <[REDACTED]@communities.gov.uk>
Sent: 15 May 2019 14:30
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Hold: RSSS group pre-meet (for 16th May GLA meeting)

Thanks [REDACTED]!

That is something that I have mentioned could be discussed at tomorrow's meeting.

My thoughts below but HO colleagues will be able to clarify tomorrow:

The reason that OISC is not at decision point 1 is that although some organisations may recommend & require independent advice before any referral, not all organisations will require this and the RSSS does not require it before a referral is made the same way that independent advice is not a mandatory requirement before a SAR is made. This is given that the end outcome of engaging with the Home Office either through the RSSS (with or without OISC) or through a SAR is the same but that the case is prioritised through RSSS. Therefore all the pathways are explored and the third arrow out of client decision 3 indicates that OISC advice can be given if mandated by the Organisation before progressing through any engagement with the Home Office. If the organisation wishes to only chose the OISC level advice pathway this is shown, the likely outcome being increased timescales given the availability of OISC advice and further increased timescales if the SAR route is then taken leaving the rough sleeper without support and clarity on their immigration status.

Happy to discuss further though and a reminder to print out in colour for the key.

Best,

[REDACTED]
Project Manager
Homelessness & Rough Sleeping Directorate | Ministry of Housing, Communities and Local Government
Ground Floor Fry Building | 2 Marsham Street | London | SW1P 4DF
T: [REDACTED] | E: [REDACTED]@communities.gov.uk | W: [MHCLG](#)



Ministry of Housing, Communities & Local Government

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From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 15 May 2019 14:14
To: [REDACTED] <[REDACTED]@communities.gov.uk>
Cc: [REDACTED] <[REDACTED]@communities.gov.uk>
Subject: RE: Hold: RSSS group pre-meet (for 16th May GLA meeting)

Thanks [REDACTED],

This looks a lot better, my only question was to whether the OISC advice should be a little earlier across all three paths at point 1 on the diagram as I think we would recommend that we think there needs to be independent advice before any referral. But I'm sure that this might come up at the meeting and I presume that colleagues from MHCLG and the Home Office will take the relevant notes.

Thanks
[REDACTED]

From: [REDACTED] <[REDACTED]@communities.gov.uk>
Sent: 14 May 2019 15:23
To: [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@MUNGOS.ORG>; [REDACTED] <[REDACTED]@MUNGOS.ORG>; [REDACTED] <[REDACTED]@thamesreach.org.uk>; [REDACTED] <[REDACTED]@thamesreach.org.uk>; [REDACTED] <[REDACTED]@thamesreach.org.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@westminster.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>
Subject: RE: Hold: RSSS group pre-meet (for 16th May GLA meeting)

Dear All,

Please find attached the new RSSS Process Map for review on Slide 2 as per last Wednesday's action.

Many thanks,

[REDACTED]

[REDACTED]

Project Manager

Homelessness & Rough Sleeping Directorate | Ministry of Housing, Communities and Local Government
Ground Floor Fry Building | 2 Marsham Street | London | SW1P 4DF

T: [REDACTED] | E: [REDACTED]@communities.gov.uk | W: [MHCLG](#)

 Ministry of Housing, Communities & Local Government

To help someone you see sleeping rough, alert local services at [StreetLink.org.uk](#)

From: [REDACTED]
Sent: 13 May 2019 10:16
To: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@MUNGOS.ORG>; [REDACTED] <[REDACTED]@MUNGOS.ORG>; [REDACTED] <[REDACTED]@thamesreach.org.uk>; [REDACTED] <[REDACTED]@thamesreach.org.uk>; [REDACTED] <[REDACTED]@thamesreach.org.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@communities.gov.uk>; [REDACTED] <[REDACTED]@westminster.gov.uk>; [REDACTED] <[REDACTED]@homeoffice.gov.uk>
Subject: RE: Hold: RSSS group pre-meet (for 16th May GLA meeting)

Dear all,

Thank you for attending the RSSS pre-meet.

Please see the attached minutes, if there are any comments please let me know and I will make the relevant changes.

Kind Regards

All the best



Ministry of Housing,
Communities &
Local Government

[Redacted]
Rough Sleeping | Homelessness Division
Ministry of Housing, Communities and Local Government
2 Marsham Street | London SW1P 4DF

[Redacted] [@communities.gov.uk](mailto:[Redacted]@communities.gov.uk) T: [Redacted]

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[REDACTED]

From: [REDACTED] (Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement) <[REDACTED]@homeoffice.gov.uk>
Sent: 08 May 2019 16:38
To: [REDACTED]; [REDACTED]@thamesreach.org.uk; [REDACTED]@thamesreach.org.uk'; [REDACTED]; WCC; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: [RSSS group] FW: Referrals to the RSSS

All,

Please see forwarded email with Praxis concerns about RSSS, shared via [REDACTED].

Best,

[REDACTED]

[REDACTED]
Deputy Manager of Home Office contribution to Rough Sleeping Strategy
Immigration Enforcement
Vulnerability Champion
E: [REDACTED]@homeoffice.gov.uk
Tel: [REDACTED]

From: [REDACTED] <[REDACTED]@MUNGOS.ORG>
Sent: 03 May 2019 15:45
To: [REDACTED] <[REDACTED]@MUNGOS.ORG>; [REDACTED]@communities.gov.uk; [REDACTED]
(Home Office commitment to Rough-Sleeping Strategy Immigration Enforcement)
<[REDACTED]@homeoffice.gov.uk>
Subject: Referrals to the RSSS

Hi, following our meeting I promised to go away and do what I could to get referrals to the team. I have tried really hard in discussion with the CEO of Praxis and with their OISC registered advisers. In short they still have a number of concerns. I won't translate these, they are pasted to the bottom of my email. While this is not great news perhaps the RSSS is able to respond to some or even all of their concerns and this could move things along. [REDACTED] I know you offered to speak directly with them but I think in the first instance we should put something in writing if that's possible? Some of their feedback is helpful as I would imagine this reflects the wider view of the sector. however I also feel some you have already addressed in your earlier email to me.
Let me know what your thoughts are.

Praxis feedback

- Even though the HO does not have a client's address, when an application is submitted it is often at that point that the client comes back onto the HO radar and is asked to report regularly. A client must report when asked or risk being labelled an immigration offender. They can then potentially be detained and removed at any one of these reporting appointments. It is unclear if a referral to the RSSS would make this more likely.
- For clients with submitted applications – we don't know who their application will be brought to the attention of if they are raised with the RSSS service and with what purpose while at least if the cases remain within the casework team who deals with the case we know that they will be dealt with in the standard way;
- The quality of Home Office decision making even for relatively straightforward cases is not good. The cases we

deal with through Street Legal in general are of a very high level of complexity and there is a concern that a 'speedy' decision is more likely to turn out to be a poorly-made decision which will leave the client in a position of needing to make an appeal or refused a right of appeal. At that point the client may not be able to progress and unless the Home Office remove them (removal rates are very low) they will remain on the street with even less prospect of success than previously;

- Many clients are extremely anxious about contact with the Home Office and very mistrustful. Any indication of a close contact with the Home Office could lead to them disengaging with us, so we need to be very confident of what will happen to cases.
- Our meetings with the RSSS have not been successful in clarifying the role of the RSSS or the policies and procedures that they are working to. As such it is very difficult for us to advise clients effectively of what the possible outcome might be of a referral. If it turned out that those refused were to be immediately detained for example, we wouldn't know that;
- From what we have seen there are no immigration decision makers in the RSSS, just immigration officers. There has been a lot written about culture embedded within UKVI and it is likely that immigration officers sitting within the enforcement team see their role as enforcement.
- Verbal assurances that this is not the case are not sufficient and given the risk to the client and the reputational risk for both Praxis and St Mungos this has to be taken seriously. Any written materials to clarify the role and aims of the RSSS must also include the internal guidance used in the RSSS for dealing with cases (as is standard for any UKVI team).

If the HO wants to expedite rough sleeping cases, it doesn't need a special team (sitting within the enforcement unit) to do so. All it needs to do is to introduce a UKVI policy stating that if a client is identified as a rough sleeper by a recognised agency then the case will be expedited (within the team where it already sits, and subject to my previous caution with regard to rushed decisions being poor decisions). I believe that they already say somewhere in policy that they will expedite cases where clients are destitute, so why don't they just actually do that?

Thanks,

██████████, sent on the move.

Director of Rough Sleeper, Offender and Migrants Services at St Mungos

Mobile: ██████████

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[REDACTED]

From: [REDACTED]
Sent: 16 May 2019 14:53
To: [REDACTED]
Subject: NNSRtf 16/05/19 notes

[REDACTED]
Brexit uncertainty

Increasing variations in service delivery regarding Non-UK nats (either BAU or 'hands-off')

No longer able to offer intl reconnection as 'legitimate' option

Lack of OISC in sector = blocker

60% non-uk in NSNO (CHAIN % is about 55%), but larger proportion on 3rd country (which is low on CHAIN totals)

Link to MS (and other exploitation)

LA and DWP unclear on entitlement & statutory duties

[REDACTED] (LSR):

Over 50% non-UK

3 offers: find work, reconnection, 'welfare checks' and non-intervention services

Issues of CHAIN 'immigration status' and 'nationality'

Est 25% 3rd countries (for LSR, outer-boroughs)

Very low numbers with immigration status recorded (and confirmed)

Hot spots for those in need of immigration advice (Heathrow and Stratford)

Reconnection has low uptake

As with [REDACTED] - often deteriorating

[REDACTED]
CMF

Successful (for part of the £3.3m total (£1.2))

Some elements not started due to 6-month only.

Reallocated to those that can be run short-term (or using other funding):

RH beds, and TST.

Most big interventions can't start until we get confirmation.

If no confirmation forthcoming, need to decide how to use remaining of £1.2 (£800k)

CMF "hoping soon"

[REDACTED] - supportive of letter to govt. from NNSRtf

[REDACTED] - same

*£9m funding for settled scheme is also only 12 months. (social integration)

[REDACTED] - invite of GLA to join 3rd sector pre-ministerial advisory group

Need to use ministerial advisory group to raise these specific issues.

[REDACTED] (RSSS):

Part of enforcement, but no enforcement agenda...but will still lead to enforcement in some cases.

Referral process not yet up, so currently working internally (picking up rs from existing HO caseloads)

Why referrals not up and running? Concerns about enforcement, and data sharing (public task v consent).

Clear that HO can't access CHAIN data

HO will feedback what orgs can and can't do with/without OISK

[REDACTED] need to bring migrant sector in on this early. Social integration GLA happy to facilitate this.

Increasingly saying that migrant sector pushback and political ramifications are key part of the issue even for existing routes.

██████████: what about large groups (typically Roma or Romanian)?

██████████ and ██████████ to put together a case study on familial groups to inform options and future developments.

██████████:

RSSS also aims to increase/improve knowledge in the sector.

Wants to get more detailed info on nationality breakdown, and other demographics.

Unclear what ██████████ is asking for...

██████████ - political issue. Need govt movement to resolve.

Inc DWP.

██████████ which funding can be used for the legal advice?

We need to update outreach protocol anyway, with NNSRtf backing, could we include guidance on what advice can and can't be given with/without OISK?

██████████:

How to line up today's ideas with ██████████ and ██████████ conversations.

██████████ - transparency is paramount.

██████████

Senior Project Officer (Rough Sleeping), Housing & Land

GREATERLONDONAUTHORITY

169 Union Street, London SE1 0LL

██████████ | ██████████

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██████████@london.gov.uk