

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD3043

Title: Rough sleeping services

Executive summary:

The GLA commissions and funds a range of pan-London rough-sleeping services. This Mayoral Decision seeks approval for receipt of £542,000 from the Department for Levelling Up, Housing and Communities (DLUHC); and expenditure of £1,928,890.

This expenditure includes £1,245,394 from the GLA rough sleeping budget; £542,000 from the aforementioned government funding; and £141,496 as a reallocation of government Rough Sleeping Initiative funding, receipt of which was approved by MD2957. The expenditure is to provide severe weather emergency accommodation; extend the Crisis at Christmas project; evaluate the sub-regional immigration advice service; contribute to development of the LOfS data system; and expand the work of three existing rough sleeping services.

Decision:

That the Mayor approves the following:

1. Receipt of £542,000 of government funding from DLUHC for Crisis at Christmas, as listed at 2b, below.
2. Expenditure of £1.93m, comprising £1.25m of GLA rough sleeping programme budget and £683,496 government funding as follows:
 - a. £541,514 for Severe Weather Emergency Protocol (SWEP) surge emergency accommodation and accompanying services in 2022-23
 - b. £542,000 for the Crisis at Christmas project – comprising expenditure of £391,978 to Crisis by grant; £141,855 to St Mungo's by grant; and £8,167 for GLA staffing in 2022-23
 - c. £45,000 to procure an evaluation of the sub-regional immigration advice service in 2022-23
 - d. £90,000 for development of the Life Off the Streets data system, to London Councils by grant, and £41,668 for StreetLink, to Homeless Link by grant, both in 2022-23
 - e. £236,797 for the exercise of existing contractual options in the Combined Homelessness and Information Network and the Tenancy Sustainment Team (TST) North contracts with Homeless Link and Single Homeless Project respectively, £178,681 in 2022-23 and £58,116 in 2024-25
 - f. £431,911 for a variation of the No Second Night Out (NSNO) with St Mungo's in 2022-23.
3. An exemption from the GLA Contracts and Funding Code in relation to the variation to the NSNO contract.
4. A delegation to the Executive Director of Housing and Land to approve the allocation of monies within the £541,514 listed at 2a, for emergency SWEP accommodation and related services during winter 2022-23.

Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Date:

5/12/22

PART I – NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR

Decision required – supporting report

1. Introduction and background

- 1.1. During 2021-22, 11,018 people were seen sleeping rough in London. This is more than double the number in 2010-11. Of these, 68 per cent were new to the streets; 50 per cent were non-UK nationals; and 22 per cent were from Central and Eastern European countries. Around two-thirds had support needs, of which 44 per cent related to mental health; 29 per cent to alcohol; and 31 per cent to drugs.
- 1.2. In his London Housing Strategy, published in 2018, the Mayor set out his aim that there should be a sustainable route off the streets for every rough sleeper in London. In June 2018 he published his Rough Sleeping Plan of Action, which outlines the steps that need to be taken by City Hall, the government and others to achieve this aim. In 2021, the Mayor refreshed his Rough Sleeping Commissioning Framework, which sets out the overarching and cross-cutting priorities that will underpin the GLA's commissioning activities over the three years from 2021 to 2024.
- 1.3. Since taking office, the Mayor has been expanding the pan-London rough-sleeping services that the GLA funds and commissions. These services collectively form the GLA rough sleeping programme. The services are for people with experience, or at risk, of sleeping rough. They are initiatives to tackle rough sleeping that cannot or would not be provided at a London-borough level, as they are either niche or pan-London/multi-borough in their remit. Since 2016, the GLA rough sleeping programme has supported over 13,500 people to leave the streets for good.
- 1.4. Since the start of the COVID-19 pandemic, the Mayor's rough sleeping services have helped more people than ever before, as have those services commissioned by councils in London. The last annual statistics from the Combined Homelessness and Information Network (CHAIN) suggested that significant progress had been made in reducing rough sleeping in London, with a 24 per cent decrease in the number of people seen sleeping rough in London in 2021-22, compared with the previous year. However, in the first six months of 2022-23, despite record numbers of people being supported off the streets, there has been a 21 per cent increase in the number of people seen sleeping rough, compared to the same period last year.
- 1.5. The GLA rough sleeping programme is funded from core GLA budget, supplemented by various government grants, such as the Rough Sleeping Initiative (RSI). The following Mayoral Decisions (MDs) pertain to this programme:
 - MD2789 (March 2021) approved expenditure of £13.69m of GLA rough sleeping programme budget to extend various core services up to March 2025; and £1.36m to continue to grant-fund various projects. It also approved receipt and expenditure of £6.66m in government funding, which included the continuation of several RSI projects.
 - MD2853 (August 2021) approved receipt and expenditure of £24.55m in government funding, and expenditure of £0.17m of GLA rough sleeping programme budget, to fund various projects.
 - MD2957 (March 2022) approved receipt and expenditure of £3.65m in government funding, and expenditure of £3.85m of GLA rough sleeping programme budget, to fund various projects.
 - MD2993 (June 2022) approved the receipt of £30.38m from the Department for Levelling Up, Housing and Communities' (DLUHC's) RSI.
- 1.6. Many of the services and interventions that are the subject of this decision form part of the GLA rough sleeping programme; and are extensions, expansions or continuations of services previously approved by the above MDs.

Activity and funding profile

- 1.7. This decision approves funding for multiple separate elements of the GLA rough sleeping programme.
- 1.8. The newly approved expenditure will be as follows:

Service/project	Funding source	Value
SWEP surge emergency accommodation and support	GLA core rough sleeping programme budget	£541,514
Crisis at Christmas extension	Central government grant	£542,000
Evaluation of sub-regional immigration advice service for rough sleepers	GLA core rough sleeping programme budget	£45,000
LOtS data system development	GLA core rough sleeping programme budget	£90,000
StreetLink	GLA core rough sleeping programme budget	£41,668
CHAIN	GLA core rough sleeping programme budget	£95,301
NSNO	GLA core rough sleeping programme budget	£431,911
PRS Floating Support North	Central government grant (RSI)	£141,496
TOTAL		£1.93m

- 1.9. Details of the services/projects in the above table, and a more detailed breakdown of the funding mechanisms and budget, are set out in section 2.

2. Objectives and expected outcomes

- 2.1. The GLA rough sleeping programme focuses on achieving the Mayor's vision for everyone sleeping rough to have a sustainable route away from the streets. The programme is underpinned by the overarching priorities set out in the pan-London Rough Sleeping Commissioning Framework 2021, to work with boroughs and partners. These priorities are:
- to prevent people from sleeping rough
 - to provide an immediate route off the streets
 - to deliver sustainable accommodation and solutions for those leaving rough sleeping
 - to ensure people have the support which they need to rebuild their lives.
- 2.2. A key performance indicator for the GLA is that at least 85 per cent of rough sleepers who are supported by GLA rough-sleeping services do not return to the street.
- 2.3. RSI 2022-25 funding from the DLUHC follows the government's stated objective of ending rough sleeping by the end of the current Parliament, with a three-year commitment to enable bidders to build, grow and improve their rough-sleeping provision. The aim of the GLA services funded through the RSI 2022-25 is to support individual boroughs towards reducing rough-sleeping numbers in London, while monitoring the overall London-wide target through the new Life Off the Streets (LOtS) governance structures. The GLA will deploy pan-London resources as appropriate (in partnership with London Councils, the DLUHC and other agencies) to help reduce the numbers of those rough sleeping in London.
- 2.4. Further details of individual services and projects for which approval is being sought under this MD are set out below.

Surge capacity during severe weather

- 2.5. The Severe Weather Emergency Protocol (SWEP) is an emergency humanitarian response enacted when temperatures drop to freezing, the primary aim of which is to preserve life. Every year, the GLA provides SWEP overflow provision to ensure sufficient capacity, at a pan-London level, to meet demand when borough local provision reaches capacity.
- 2.6. Prior to the pandemic, the GLA delivered SWEP accommodation solely through a communal shelter model. This typically made temporary use of space in existing pan-London services and other buildings occupied by the provider of pan-London overflow SWEP, St Mungo's. During the pandemic, pan-London overflow SWEP moved to a model of single-occupancy emergency accommodation due to the risks associated with communal sleeping. The ongoing risk of COVID-19 transmission means that during Winter 2022-23 some single-occupancy accommodation will continue to need to be utilised.
- 2.7. This winter, the GLA will provide additional self-contained pan-London bedspaces to support people off the streets during freezing temperatures. This surge capacity will ensure that the most vulnerable people sleeping rough in London are safeguarded during Winter 2022-23, when the risks of cold weather may still be exacerbated by the ongoing risk of COVID-19.
- 2.8. This severe weather emergency accommodation will be provided with accompanying support onsite and operate under the 'In for Good' principle. This means that no one is asked to leave until there is a support plan in place to end their rough sleeping, regardless of whether temperatures have risen. Through this support, the emergency accommodation is often a catalyst for ending people's homelessness for good, as well a humanitarian response during severe weather.
- 2.9. This MD seeks approval to spend up to £541,514 of the GLA's rough sleeping programme budget on emergency winter provision in 2022-23. It also seeks to delegate authority to the Executive Director of Housing and Land to approve the allocation of monies within this £541,514 expenditure on hotels, any other emergency accommodation and related services.

Crisis at Christmas

- 2.10. In the winter of 2021-22, the GLA worked in partnership with the DLUHC and St Mungo's to support the charity Crisis in extending its Crisis at Christmas initiative beyond its usual Christmas and New Year opening. The purpose of this was to find longer-term options for more people and prevent them from returning to rough sleeping when the Crisis at Christmas hotels closed. Through this work, 160 people who likely would otherwise have returned to the streets were found a longer-term accommodation option during this extension.
- 2.11. Due to the success last winter, the DLUHC has allocated the GLA £542,000 to again help facilitate Crisis's extension of its Crisis at Christmas initiative. One of the hotels that Crisis will use over the Christmas period, to accommodate rough sleepers, will be extended for a month beyond when it would otherwise close. During this extension, additional caseworkers from St Mungo's will join Crisis staff in the hotel to deliver casework and long-term outcomes for guests.
- 2.12. This MD seeks approval for receipt and expenditure of £542,000 of funding from central government. The expenditure in 2022-23 will comprise £391,978 by grant to Crisis; £141,855 by grant to St Mungo's; and £8,167 for GLA staffing.

Evaluation of sub-regional Immigration Advice Services

- 2.13. The GLA, in partnership with London Councils, bid for and secured £4.9m funding under the RSI to fund four sub-regional Immigration Advice Services from 1 July 2022 to 31 March 2025. The GLA granted this funding to London Councils to run a grant programme for these services, as approved under MD2993. This is an ambitious, new and innovative grant programme that seeks to connect those who have immigration needs and are rough sleeping (or at risk of rough sleeping) with specialist immigration advice; and support them to clarify and/or regularise their immigration status to prevent or tackle rough sleeping.

- 2.14. An evaluation of this innovative new programme will enable the GLA, London Councils and the DLUHC to assess the impact of this programme; make improvements to the services over the three-year programme; and provide an evidence base for the DLUHC to inform any future funding for these services. The evaluation will be procured through a competitive process in line with the GLA's Contracts and Funding Code.
- 2.15. This MD seeks approval for up to £45,000 of expenditure from the GLA's rough sleeping programme budget to commission an evaluation of the sub-regional Immigration Advice Services programme in 2022-23.

LOtS data system development

- 2.16. The LOtS group – which is jointly chaired by the Deputy Mayor for Housing and Residential Development, and London Councils – includes a data workstream that is tasked with considering the flow and use of data across the sector in London.
- 2.17. The LOtS data workstream aims to improve the general data ecosystem to inform strategic decisions and improve operational delivery. This has recently expanded to include delivery of the government's new rough-sleeping indicators in London.
- 2.18. The work of this group is led by London Councils and the GLA. Jointly with the London Office of Technology and Innovation (LOTI), the group has consulted with partners to develop a 'data warehouse' project that will allow matching of non-identifiable data across multiple relevant systems to inform high-level strategic decisions.
- 2.19. This project will also enable the adoption and roll-out of the government's new rough-sleeping indicators in London.
- 2.20. The total cost of the project is estimated to be in the region of £250,000. The GLA's grant funding will cover the initial project costs, whilst London Councils are securing the remaining funding from London's local authorities and the DLUHC.
- 2.21. London Councils and LOTI will oversee the procurement of a delivery partner and manage the project.
- 2.22. This MD seeks approval for up to £90,000 of expenditure by grant to London Councils in 2022-23 from the GLA's rough sleeping programme budget.

StreetLink

- 2.23. StreetLink is a website, mobile app and phone service for England and Wales. It enables people to send an alert when they see someone sleeping rough, which will connect that person to local support services that can help to end their homelessness.
- 2.24. The level of GLA funding for StreetLink has not increased since 2015, but during that time the provider, Homeless Link, has increased the level of fundraised contributions to the service budget in order to fill a growing budget deficit. MD2993 approved £60,000 of expenditure on grant funding for StreetLink between 1 April 2022 and 31 March 2023, the same level of funding as in previous years. An assessment of options to reduce expenditure has concluded that this would require a reduction in the service delivered, which would have a significant negative impact on the performance of the StreetLink service. This, in turn, would have an unacceptable knock-on effect on other rough-sleeping services, and on outcomes for vulnerable people in London.
- 2.25. It is proposed that the GLA, considering the above factors, will provide additional funding for 2022-23. While the GLA is willing to meet the budget deficit for the current financial year, to ensure continuity of service for rough sleepers in London, in future years a more sustainable funding commitment from the DLUHC will be required. There is no expectation that the GLA will fill this deficit in future years.

- 2.26. This MD seeks approval for an additional £41,668 of expenditure, to be allocated from the GLA rough sleeping programme budget, by grant to Homeless Link for StreetLink in 2022-23.

CHAIN

- 2.27. The Combined Homelessness and Information Network (CHAIN) contract was awarded to Homeless Link and entered into following an OJEU procurement exercise to identify the provider. The contract began in April 2022. The initial contract value was £1.2m over three years (£0.4m per annum) and was approved under MD2789. Exercise of a contractual option with a value of £0.08m was approved by MD2957, and agreed in March 2022, to accept then newly announced government funding for short-term staffing, bringing the total current contract value to £1.28m.
- 2.28. CHAIN is the most complete source of data on a rough-sleeping population within the UK. Commissioned by the GLA, and provided by Homeless Link since 1 April 2022, the CHAIN system is the main recording tool for all street-outreach services across London. It plays an important role in monitoring the work of on-street services; and the needs and outcomes for people they work with. CHAIN also produces regular published reports for the homelessness sector and the public.
- 2.29. The existing contract funds the day-to-day requirements for CHAIN. There are, however, several current and upcoming additional requirements. The main additional requirement is to develop recording and reporting capabilities for government's new set of rough-sleeping indicators, which were announced in Summer 2022. The development and roll-out of these new capabilities will require additional staff capacity from autumn 2022 into summer 2023. The LOTs group has also initiated a data-linking project that is due to begin late in 2022-23, and continue into 2023-24. It will require significant time and expertise from the CHAIN team.
- 2.30. The CHAIN contract allows the GLA to require Homeless Link to provide two kinds of optional services: general and specific. These options were set out in the initial procurement documents in clear, precise and unequivocal clauses. The option is being exercised in accordance with those clauses and at the price stated by Homeless Link for this option during the procurement exercise.
- 2.31. This MD seeks approval for expenditure of £95,301 from the GLA rough sleeping programme budget in 2022-23 for the exercise of the GLA's contractual option for general services; in this case additional CHAIN staffing. This will enable the team to continue to provide an excellent day-to-day service whilst developing the additional required improvements and functionality.

No Second Night Out

- 2.32. No Second Night Out (NSNO) supports people who are seen sleeping rough for the first time. Outreach teams support them to access the service. Once at an NSNO turnaround 'hub' – of which there are three – individuals spend time with specialist staff who will quickly establish their current situation and the best options available to them. The NSNO team makes people offers of help based on their specific circumstances and needs; and supports them to take up that offer. The hubs are complemented by self-contained hotel assessment beds; more medium-term staging post-type accommodation; or appropriate move-on arrangements within London boroughs. This model will allow an immediate, off-the-street assessment service for rough sleepers that is COVID-safe.
- 2.33. The NSNO contract was awarded to St Mungo's and entered into following an OJEU procurement exercise to identify the provider. The contract began in April 2017. The initial NSNO contract value was £14.72m over four years (£3.68m per annum) and was approved under MD2031. MD2333 approved expenditure of £1.54m for provision of one additional assessment hub and two additional staging posts, funded by central government grant in 2018-19. MD2481 approved an inflationary uplift for this service; the provision of SWEP beds; and government RSI-funded enhancements to the service, at a cost of £2.04m. MD2125 approved variations totalling £2.63m for further government-funded enhancements to the service in 2019-20. MD2657 approved a number of variations to the contract, totalling £1.42m, funded from the government's RSI to 31 March 2021. MD2789 approved the extension of the contract for a further two years until March 2023; and the provision of

emergency severe weather accommodation, and continuation of certain enhancements by variation for the first quarter of 2021-22, at a total expenditure of £8.49m. MD2853 then extended these enhancements for the remainder of 2021-22; and MD2957 further expanded them until 30 June 2022. The total cost of these latter two variations was £1.41m. On receipt of the GLA's RSI 2022-25 allocation, MD2993 extended these RSI-funded enhancements to March 2023. The cumulative total of the contract to date for NSNO, including all extensions and variations, is £33.7m.

- 2.34. MD2993 also approved procurement of the NSNO contract to commence from 1 April 2023. The contract award will be one year, with a further recommissioning exercise to take place during 2023-24, once the proposed developments to the service model have been fully evaluated.
- 2.35. Prior to the COVID-19 pandemic, the NSNO service model was reliant on the use of communal sleeping arrangements, with up to 25 people sleeping in one large room in each of the three 'hubs'. People sleeping rough would access these hubs directly from the street and stay there whilst intensive casework was undertaken to find them a longer-term route out of rough sleeping. Since COVID-19, the GLA has worked with St Mungo's to implement a new model that much reduces the risk of COVID-19 transmission. This model, as described in 2.32 utilises single-occupancy accommodation, rather than communal sleeping arrangements.
- 2.36. As national and GLA public health advice remains in place stating that large-scale communal sleeping spaces in homelessness present an unacceptable risk of transmission, NSNO will continue to deliver the service within the updated service model throughout 2022-23. The use of single-occupancy assessment accommodation in hotels, rather than large-scale communal sleeping arrangements at the hubs, has increased St Mungo's costs of delivering the NSNO service as contracted. Therefore, the GLA proposes to allocate additional funding from the rough sleeping programme budget to meet the costs of delivering the service in 2022-23.
- 2.37. This MD therefore seeks approval for expenditure of £431,911 from the rough sleeping programme budget to fund the increased costs of delivering the NSNO service under current public health guidance in 2022-23, to St Mungo's by contract variation. Subject to approval, the total value of the contract will increase to £34.13m.

Exemption from the Contracts and Funding Code

- 2.38. The above-mentioned variation to the NSNO contract requires an exemption from normal procurement processes, as outlined in the GLA's Contracts and Funding code. As discussed in 2.36, the purpose of the variation is to meet the additional service costs in 2022-23 which have arisen due to the service remodelling necessitated by current public health advice. St Mungo's is already under contract to deliver the NSNO service until 31 March 2023 and therefore is the supplier which delivers the remodelled service in full and bears the cost of this. It would not be possible for any other party to do this, as it is inextricably linked to St Mungo's existing work as the contracted service provider. As this work and its cost cannot be separated from St Mungo's delivery of the NSNO contract, it is not feasible to undertake a procurement process.
- 2.39. There is a clear rationale for an exemption from the GLA's Contracts and Funding Code on the basis that St Mungo's have previous involvement in this specific project that cannot be separated from the new project/work, which is grounds for an exemption under Section 10 of the Code. Whilst there has been no competitive process, the GLA has received detailed budget breakdowns from St Mungo's which outline the additional costs of the revised service model and benchmarked the service's revised price and outcomes against similar services. This has demonstrated that the service still represents value for money for the GLA.

TST PRS North Floating Support Services – reallocation of funding

- 2.40. The Clearing House is a partnership funded by the GLA that ringfences social rented homes for people with a history of rough sleeping, thereby improving access to accommodation for this client group.

- 2.41. People living in Clearing House accommodation receive support from Tenancy Sustainment Teams (TSTs) of which there are two: one in north London and one in south London. In 2019-20, 2020-21 and 2021-22, the GLA used funding secured from the government to expand the work of TSTs to support former rough sleepers in private rented sector (PRS) accommodation.
- 2.42. MD2957 approved £0.15m expenditure of RSI funding to extend the TST North St Mungo's contract to deliver the TST PRS element from 1 April 2022 to 30 June 2022. However, this element of the service was in the end delivered by St Mungo's between 1 April 2022 and 30 September 2022 at no additional cost to the Authority, through the provider's use of underspend accrued on the project from 2021-22. Therefore, this MD seeks to reallocate this RSI funding to the new TST North provider, Single Homeless Project (SHP), for its work in supporting people in PRS accommodation.
- 2.43. The TST North contract has been provided by SHP since April 2022. The contract was entered into following a competitive procurement process that took place during 2021-22 and commenced on 1 April 2022. The initial contract value was £5.16m over three years. MD2993 approved £1.15m to expand the service to support people in private rented accommodation from 1 October 2022 to 31 March 2025. This brought the total contract value to £6.31m.
- 2.44. The TST North contract allows the GLA to require SHP to provide two kinds of optional services: general and specific. These options were set out in the initial procurement documents in clear, precise and unequivocal clauses. This option is being exercised in accordance with those clauses and at the price stated by SHP for this option during the procurement exercise.
- 2.45. This MD seeks approval to reallocate £141,496 to fund the TST North PRS floating support service. This expenditure breaks down as follows:
- £58,116 to meet the full costs of delivering the PRS floating support element of the TST North service in 2024-25, through exercise of the option in the TST North (SHP) contract
 - £83,380 to exercise an option in the TST North (SHP) contract for the delivery of the PRS floating support element in 2022-23, which includes enabling SHP to review service outcomes for supporting people in the PRS and review referral practices during 2022-23. This will inform service improvements and better practice across the sector.

3. Equality comments

- 3.1. Under section 149 of the Equality Act 2010, as public authorities, the Mayor and the GLA are subject to a public-sector equality duty and must have "due regard" to the need to:
- eliminate unlawful discrimination, harassment and victimisation
 - advance equality of opportunity between people who share a relevant protected characteristic and those who do not
 - foster good relations between people who share a relevant protected characteristic and those who do not.
- 3.2. Protected characteristics under section 149 of the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status (all except the last being "relevant" protected characteristics). The equality comments should specifically relate to the decision.
- 3.3. The Mayor's equality, diversity and inclusion strategy 'Inclusive London' includes an objective (Objective 6) to:

“work with government, councils, the voluntary sector and communities to ensure rough sleepers are helped off the streets as quickly and sustainably as possible. There should be a way for every rough sleeper in London to leave the streets”.

The funding in this decision will help to tackle the inequalities experienced by certain groups of Londoners most affected by homelessness and rough sleeping.

3.4. Of those seen sleeping rough in 2021-22:

- 48 per cent were non-UK nationals
- 2 per cent were from Gypsy/Romany/Traveller communities
- 50 per cent had a mental health need
- 17 per cent were women
- 59 per cent were aged 26-45
- 8 per cent were under 26
- 12 per cent were over 55.

3.5. Homelessness in London, and specifically rough sleeping, disproportionately affects people with certain protected characteristics. Increasing the provision of rough-sleeping services will help to achieve positive impacts in line with the need to eliminate discrimination, harassment and victimisation.

3.6. The allocation of funding in this decision is aimed at implementing the Mayor’s policies set out in the London Housing Strategy. In May 2018 the GLA published an equality impact assessment of that strategy. Policies related to tackling homelessness and helping rough sleepers, to which this service will contribute, were included in that assessment.

3.7. As the majority of people sleeping rough are men, more men than women are likely to access these services. However, the services will provide personalised, specialist support for women and non-binary people that meets the needs of these groups.

4. Other considerations

Key risks and issues

4.1. The key risks and issues for the GLA rough sleeping programme are outlined in the table below.

Risk description	Impact	Likelihood	Mitigating action
Insufficient staff resources within the GLA to develop, deliver and monitor the new services and projects will reduce the effectiveness of current services, and mean that new services are not developed or delivered effectively. There is a potential risk to the clients’ safety if services are poorly designed and delivered, or providers are not effectively monitored.	High	Low	There are dedicated GLA leads for each existing and new service. All services are monitored through quarterly formal reporting, and more frequent meetings, as well as occasional audits.

The providers may perform poorly, negatively impacting on the achievement of key mayoral objectives and more detailed service-specific KPIs.	Medium	Low	A robust contract and rigorous contract-monitoring by the GLA will ensure that poor performance is identified and rectified quickly and appropriately.
The nature of rough sleeping may change, making the services and projects less relevant.	Medium	Low	The GLA Rough Sleeping team constantly monitors the rough sleeping landscape, through detailed quarterly CHAIN reports; and through strategic and operational interactions with key stakeholders from boroughs, service providers, central government and others.
COVID-19 and the post-COVID-19 recovery landscape will present challenges to the delivery of some rough-sleeping services, in particular those involving communal sleeping spaces pre-COVID-19, such as SWEP and Crisis at Christmas.	Medium	Medium	All relevant services have been adapted in the light of COVID-19, to ensure they are fit for purpose in the current public health landscape. Policy work is ongoing to agree a long-term position regarding communal spaces.
The numbers of people seen sleeping rough may change to the point where services are no longer appropriate at the scale envisaged.	Medium	Low	The GLA Rough Sleeping team constantly monitors the rough-sleeping landscape, through detailed quarterly CHAIN reports; and through strategic and operational interactions with key stakeholders from boroughs, service providers, central government and others.

Links to Mayoral strategies and priorities

- 4.2. The projects and services for which this MD seeks approval will help meet Policy 7.2, “Supporting Rough Sleepers off the Streets”, of the Mayor’s London Housing Strategy. This will occur through a range of actions to help meet the stated central aim of the Mayor “to ensure there is a route off the streets for every single rough sleeper in London”. The GLA Rough Sleeping team works closely with partners in local authorities, London Councils, the DLUHC and the charity sector to support rough sleepers off the streets; and provides pan-London leadership and coordination. The services and projects funded form part of proposal B of the same policy, which states:

“The Mayor will fund and commission a range of pan-London services and other initiatives to complement those provided by local councils. These will focus on identifying rough sleepers and intervening rapidly to support them off the streets, providing specialist support for particular groups, and helping rough sleepers stay off the street.”

- 4.3. The projects and services funded through this MD will also help meet the objectives of the London Health Inequalities Strategy. Addressing homelessness and rough sleeping is one of the seven objectives set by the Mayor to achieve the aim that all Londoners benefit from an environment and an economy that together promote good mental and physical health.

Conflicts of interest

- 4.4. There are no known conflicts of interest for those involved in the drafting or clearance of this report.

Subsidy Control

- 4.5. In regards to the grant to Crisis, there is an equity rationale for this, as it will mean circa 150 people will be supported to find a longer-term solution to their homelessness, rather than returning to the streets after their stay at Crisis at Christmas, as would otherwise have been the case. The funding to be granted to Crisis is specifically to achieve this objective only and is commensurate with the resources which they require for this purpose. Without this subsidy, it's clear that the policy objective would not be achieved, as this enhancement to the Crisis at Christmas project would not be funded. Crisis at Christmas operated for many years over the Christmas period only, with the majority of people returning to homelessness after their two-week stay. It is only with this additional funding from central government, which is being administered by the GLA, that Crisis has been enabled to enhance and prolong the Crisis at Christmas project. The GLA will closely monitor that the grant is spent as agreed and obtains the stated policy objective of supporting people to secure a longer-term route away from rough sleeping.
- 4.6. It is not believed that any less distortive means for achieving this policy objective is possible. It would not be feasible to achieve the same outcome through introducing ex ante competition for a contracted service or through utilising a different funding mechanism (e.g. a loan). The people accommodated and supported by Crisis at Christmas are homeless Londoners, who otherwise would not be able to afford to pay on a market basis for the services which the project provides. Furthermore, it should be noted that ultimate source of funding is the Department of Levelling Up, Homes and Communities rough sleeping budget, which via its grants to local authorities and directly to the third sector, also funds many other homelessness charities throughout England. Given the low risk of any impact on competition, this is far outweighed by the benefits of supporting circa 150 people, many whom will have been sleeping rough for long periods, to find a longer-term solution to their homelessness.

5. Financial comments

5.1 Mayoral approval is sought for the following:

- receipt of £542,000 of government funding from the DLUHC in 2022-23 for the Crisis at Christmas project listed under paragraph 2.10 to 2.12 above
- expenditure of £1,928,890, where £1,245,394 is to be funded from GLA rough sleeping programme budget and £683,496 from DLUHC funding as per the table under paragraph 1.7 above and below under 5.2.

5.2 £1,870,774 of the expenditure is estimated to be spent in 2022-23 with the remaining final £58,116 spend on Tenancy Sustainment Teams to be spent in 2024-25. The table below simplifies the expenditure and funding outlined in paragraph 1.7.

Funding	2022-23	2024-25	Total
GLA Core Rough sleeping budget	£1,245,394		£1,245,394
DLUHC grant for the Crisis at Christmas project	£542,000		£542,000
Rough Sleeping Initiative funding from DLUHC approved by MD2957	£83,380	£58,116*	£141,496

Total	£1,870,774	£58,116	£1,928,890
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**2024-25 spend will be funded via an income in advance year end adjustment to 2024-25*

6. Legal comments

Powers to undertake the requested decisions

- 6.1. The foregoing sections of this report indicate that the decisions requested of the Mayor fall within the statutory powers of the Authority to promote and/or to do anything that is facilitative of, or conducive or incidental to, the promotion of social development in Greater London; and in formulating the proposals in respect of which a decision is sought, officers have complied with the Authority's related statutory duties to:
- pay due regard to the principle that there should be equality of opportunity for all people
 - consider how the proposals will promote the improvement of health of persons, health inequalities between persons and to contribute towards the achievement of sustainable development in the United Kingdom
 - consult with appropriate bodies.
- 6.2. In taking the decisions requested of him, the Mayor must have due regard to the Public Sector Equality Duty; namely the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010; to advance equality of opportunity between persons who share a relevant protected characteristic (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation) and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it (section 149 of the Equality Act 2010). To this end, the Mayor should have particular regard to section 3 (above) of this report.

Receipt of funding

- 6.3. Decision 1 above seeks approval for the receipt of £542000 funding from the DLUHC for Crisis at Christmas Project. To the extent that the DLUHC has placed conditions upon the use of the said funding by the Authority, officers are reminded to ensure that the Authority comply with such conditions.

Procurement

- 6.4. Decision 2 above seeks approval for £1.93m of expenditure on various projects. Decisions 2a and 2c relate to the procurement of accommodation and attendant services for SWEP 2022/23 and the evaluation of the sub-regional immigration advice service. Officers are reminded to ensure that they comply with the Authority's Contracts and Funding Code (the "Code") when procuring same. Furthermore, officers are reminded to ensure that a written agreement be put in place between the Authority and the service provider, hotel owner or landlord before the commencement of the services or occupancy.

Exercise of existing contractual options

- 6.5. Regulation 72(1) of the Public Contracts Regulations 2015 (the "Regulations") allows contracting authorities to modify contracts during their term where the modifications have been provided for in the initial procurement documents in clear, precise and unequivocal review clauses including options. Decisions 2f and 2h above seeks approval for the exercise by the Authority of its existing contractual option to require its service providers, Homeless Link and Single Homeless Project, to provide optional services. Officers have explained at paragraphs 2.27 to 2.31 and at paragraphs 2.39 to 2.43

that the option was set out in the initial procurement documents in clear, precise and unequivocal review clauses and that that the requested exercise of the option complies with those clauses.

Provision of grant funding and subsidy control

- 6.6. Decisions 2b, 2d and 2e request approval of grant funding to Crisis, St Mungo's, London Councils and Homeless Link. Section 12 of the Code sets out the requirements for the award of grant funding by the Authority. Officers have set out at paragraphs 2.10 to 1.12, 2.16 to 2.20 and 2.23 to 2.26 how they have met these requirements.
- 6.7. The proposed grant to Crisis is valued at up to £391,978 and, as such, it exceeds the subsidy control threshold. Given that the value of the grant exceeds the subsidy control threshold, the Authority must satisfy itself that the grant complies with the subsidy control principles in the Trade and Cooperation Agreement 2020 (the "Principles"). To that end, officers have set out at paragraphs 4.6 and 4.7 above how the proposed grant meets the Principles. In particular, the officers note that the grant funding to Crisis is targeted at reducing long-term homelessness by enhancing a short-term programme to ensure that those in the programme not return to homelessness following the end of the programme. Moreover, the recipients of the support, which Crisis provides, are homeless Londoners who would not be able to access services provided on a market basis. Finally as officers observe, the funding for this grant originated with the DLUHC, which has provided similar funding to regional and local authorities throughout England. To that end, the funding is unlikely to affect trade between the regions of the United Kingdom.

NSNO variation and exemption from the Contracts and Funding Code

- 6.8. In decision 2g above, officers are seeking the approval of a variation of the Authority's contract with St Mungo's to allow for the procurement of a further £431,911 worth of services. Regulation 72(1)(b) provides that a variation may be made to a contract during its term where additional services have become necessary where a change of contractor (a) cannot be made for technical reasons; and (b) would cause significant inconvenience or substantial duplication of costs to the Authority. Regulation 72(1)(b) may only be relied upon, where the value of the services the subject of the variation do not exceed fifty percent of the original value of the contract. The proposed variation falls below the fifty percent threshold.
- 6.9. In addition to the variation, the officers have asked for an exemption from the requirements of the Code on the basis that St Mungo's has had previous involvement in a specific current project and that the services the subject of the variation cannot be separated from the existing work being carried out by St Mungo's under the NSNO contract. The officers have set out at paragraphs 2.32 to 2.39 how the requested variation falls within both regulation 72(1)(b) of the Regulations and section 10 of the Contracts and Funding Code.
- 6.10. Subject to the approval of the variation, the officers are reminded of the need to publish a contract notice advising of the variation to the NSNO contract.

Delegation

- 6.11. Any function exercisable by the Mayor on behalf of the Authority may also be exercised by a member of the Authority's staff; albeit subject to any conditions that the Mayor sees fit to impose. To this end, the Mayor may make the requested delegation to the Executive Director – Housing and Land, if he so chooses.

Staffing

- 6.12. It should be noted that this decision relates only to the approval of expenditure. There is reference to expenditure of £8,167 for GLA staffing in 2022-23 and any staffing decisions that need to be made following this decision must be approved by the Head of Paid Service in accordance with the GLA Head of Paid Service Staffing Protocol and Scheme of Delegation.

7. Planned delivery approach and next steps

Activity	Timeline
LOtS data system development grant agreement signed	November 2022
StreetLink grant agreement signed and continuation of service delivery	November 2022
CHAIN contract variation signed and continuation of enhanced staffing model	November 2022
NSNO contract variation signed and continuation of service model within public health guidance	November 2022
PRS TST North contract variation signed; and commencement of review of service outcomes, and review of referral process	November 2022
Severe weather emergency accommodation opens	1 December 2022
Invitation to tender for evaluator of sub-regional Immigration Advice Services for rough sleepers	December 2022
LOtS data system delivery partner appointed and development commences	December
Crisis at Christmas commences	20 December 2022
Crisis at Christmas extension period begins	5 January 2023
Contract awarded for sub-regional immigration advice service for rough sleepers	January 2023
Crisis at Christmas extension period ends	26 January 2023
Severe weather emergency accommodation closes	31 March 2023

Appendices and supporting papers:

None

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:

Drafting officer
to confirm the
following (✓)

Drafting officer:

David Orton has drafted this report in accordance with GLA procedures and confirms the following:

✓

Sponsoring Director:

Tim Steer has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

Mayoral Adviser:

Tom Copley has been consulted about the proposal and agrees the recommendations.

✓

Advice:

The Finance and Legal teams have commented on this proposal.

✓

Corporate Investment Board

This decision was agreed by the Corporate Investment Board on 21 November 2022.

✓

EXECUTIVE DIRECTOR, RESOURCES:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature:

D. Gane

Date:

23/11/2022

CHIEF OF STAFF:

I am satisfied that this is an appropriate request to be submitted to the Mayor.

Signature:

D. Bellamy

Date:

19/11/2022

