

## **NACCOM Briefing: 'Ending Rough Sleeping for Good' Strategy (England only)**

This briefing was published on 22<sup>nd</sup> September 2022 in response to the Government's policy paper '[Ending Rough Sleeping for Good](#)' (published 3<sup>rd</sup> September 2022).

### **Introduction to the Strategy:**

One a single night in Autumn 2021, there were four people sleeping rough per 100,000 people in England. Whilst rough sleeping levels have halved since 2017 and currently stand at an eight-year low, further progress remains to meet the Government's commitment to ending rough sleeping in England before 2024.<sup>1</sup> On September 3<sup>rd</sup>, the Government published '[Ending Rough Sleeping for Good](#)',<sup>2</sup> a cross-Government strategy setting out how it will build upon the advancements made since the 2018 'Rough Sleeping Strategy'<sup>3</sup> and meet its target of ending rough sleeping. The Strategy introduces a "prevention-first" approach to ending rough sleeping in England, backed by £2bn funding over the next three years.

### **Why it matters to NACCOM:**

NACCOM is the [No Accommodation Network](#), a network of over 135 member organisations across the UK dedicated to ending destitution amongst refugees, people seeking asylum or who have been refused asylum and migrants with no recourse to public funds (NRPF).

Our network exists to ensure that the causes of, impacts of, and solutions to, homelessness and destitution are understood; that more policies and practice exist to support the end to destitution; and that more and better services exist to support people out of immediate destitution and provide long-term pathways out of destitution.<sup>1</sup>

We are acutely aware of the ways that policies developed by Government, including the Home Office and the Department for Levelling Up, Housing and Communities (DLUHC), can act as direct and indirect drivers of homelessness amongst people seeking asylum and other migrants.<sup>1</sup> We also know that the impact of these policies is particularly strong amongst those with no recourse to public funds (NRPF)<sup>1</sup> - such as people seeking asylum who have become appeal rights exhausted - who are unable to access homelessness assistance and social housing because of their immigration status.

As we explain in this briefing, despite several positive commitments introduced in 'Ending Rough Sleeping for Good', we do not believe the Government's target to end rough sleeping by 2024 will be achieved unless further action is taken to prevent homelessness and rough sleeping amongst migrants.

### **What the Strategy includes:**

#### ***A definition for ending rough sleeping***

For the first time in a Government strategy, 'Ending Rough Sleeping for Good'<sup>4</sup> develops a definition for ending rough sleeping: that rough sleeping is prevented wherever possible, and where it does occur it is rare, brief, and non-recurrent. The Strategy introduces a new set of metrics to track progress against this definition, co-designed with the What Works Centre (the Centre for Homelessness Impact).

1 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1102408/20220903\\_Ending\\_rough\\_sleeping\\_for\\_good.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1102408/20220903_Ending_rough_sleeping_for_good.pdf)

2 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1102408/20220903\\_Ending\\_rough\\_sleeping\\_for\\_good.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1102408/20220903_Ending_rough_sleeping_for_good.pdf)

3 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1102469/Rough-Sleeping-Strategy\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1102469/Rough-Sleeping-Strategy_2018.pdf)

4 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1102408/20220903\\_Ending\\_rough\\_sleeping\\_for\\_good.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1102408/20220903_Ending_rough_sleeping_for_good.pdf)

### ***Funding for existing and new initiatives to prevent rough sleeping***

Amongst the £2bn investment released by the Strategy is an expanded £500m Rough Sleeping Initiative (RSI) over three years; £200m through the Single Homelessness Accommodation Programme (SHAP); and a £12m Test and Learn programme to trial innovative approaches to reduce homelessness and rough sleeping.

The Strategy will also deliver £316m through a Homelessness Prevention Grant in 2022/23 to fully embed the Homelessness Reduction Act 2017 and empower Local Authorities' prevention work. Other prevention-oriented commitments include investment in the Affordable Homes Programme; a commitment to working with stakeholders from Local Authorities and the service delivery sector to establish an operational risk assessment tool to assist with the prevention of rough sleeping; and further actions to ensure that no-one is released from a public institution to the streets.

### ***Investment in local support services***

In terms of intervention, the Strategy extends investment into co-ordinated local rough sleeping services, including through the flagship £500m Rough Sleeping Initiative 2022-25 and the £10m Night Shelter Transformation Fund to increase provision of quality single-room provision within the night shelter sector.

To assist with recovery, the Strategy channels £186.5m into drug and alcohol treatment to support people experiencing rough sleeping; £9m annually into specialist rough sleeping mental health services; £433m to deliver 6,000 new move-on homes under the Rough Sleeping Accommodation Programme; £200m to deliver up to 2,400 homes and wraparound support through a new Single Homelessness Accommodation Programme (SHAP); and a £20m Supported Housing Improvement Programme to support Local Authorities to ensure supported housing is providing adequate, tailored support and good-quality accommodation for its residents.

### **The Strategy and rough sleeping amongst migrants:**

Data from the Autumn 2021 rough sleeping snapshot indicates that at least 25% of those sleeping rough in England last year were born outside of the UK.<sup>5</sup> 'Ending Rough Sleeping for Good'<sup>6</sup> recognises that migrant rough sleepers "often have specific support needs and restrictions accessing some support as a result of their immigration status" and emphasizes the need for "tailored interventions for this diverse group so that they can be supported either to get a job when individuals have permission to work, resolve their immigration status, or return to their home country."

The Strategy praises the work of Local Authorities who supported migrant rough sleepers during and since the Covid-19 pandemic, and pledges to build upon this "exhaust all options" approach to "make sure those who have restricted eligibility for public funds have a clear pathway off the streets". One way the Government commits to doing this is via the Rough Sleeping Support Service (RSSS). The Strategy outlines several reforms made to the RSSS, including a refresh of existing guidance and user templates and the moving of the service out of Home Office Immigration Enforcement and implementing a new service this year, which the Government hopes will increase take-up, helping more individuals facing rough sleeping to resolve their immigration status. The Strategy also commits to piloting improved support to explore what more the Government can do to increase take up and support of those engaged with the voluntary returns process.

Aligned with a wider commitment to prevent rough sleeping amongst people exiting public institutions including prisons and hospitals, the Strategy also commits to reviewing the impact of the new asylum dispersal system on homelessness and rough sleeping, with the aim of reducing the risk that people leave asylum support to the streets.

5 <https://www.gov.uk/government/statistics/rough-sleeping-snapshot-in-england-autumn-2021/rough-sleeping-snapshot-in-england-autumn-2021#:~:text=There%20were%202%2C440%20people%20estimated,people%20or%2038%20%25%20since%202010.>

6 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1102408/20220903\\_Ending\\_rough\\_sleeping\\_for\\_good.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1102408/20220903_Ending_rough_sleeping_for_good.pdf)

## NACCOM's view on the Strategy:

**Ending Rough Sleeping for Good** marks an important step towards the Government's commitment to ending rough sleeping by 2024. The Strategy releases a significant amount of funding and contains a strong emphasis on prevention that recognises the importance of cross-departmental working to tackle the root causes of rough sleeping. The Strategy also introduces specific funding around move-on housing, which is welcomed and will contribute to ending rough sleeping if supported by wider reform targeting housing quality, availability, and cost.

Nonetheless, whilst the Strategy recognises that migrant rough sleepers require tailored interventions, it fails to consider the broad range of Home Office policies that drive homelessness. Subsequently it ignores some of the key areas in which action is most needed to prevent rough sleeping amongst migrants.

## Our key insights:

- ***The importance of cross-Government coordination***

In the report 'Unlocking the Door: A roadmap for supporting non-UK nationals facing homelessness in England'<sup>7</sup>, Homeless Link and NACCOM outlined a series of recommendations, which we believe will help national and local Government tackle homelessness in migrant communities. In this report we emphasise the importance of a cross-departmental approach to tackling rough sleeping, arguing that collaboration between the Department for Levelling Up, Housing and Communities (DLUHC) and the Home Office would be needed to properly understand and address the causes of homelessness amongst migrants.

The Strategy shows signs of coordination between DLUHC and the Home Office towards meeting the 2024 target, but it does not go far enough. In 'Unlocking the Door'<sup>8</sup>, we recommend that national Government conducts a full review of all immigration-based restrictions on public funds to mitigate their role in driving homelessness. Whilst the Strategy acknowledges the role that the implementation of a full dispersal model may play in driving rough sleeping, other Home Office policies that put people in the asylum and wider immigration system at greater risk of rough sleeping are not addressed.

- ***Drivers of homelessness within the asylum system***

The Strategy bears no mention of other asylum support-related policies that may increase the risk of rough sleeping, such as delays in asylum-related decision-making (including support applications), accommodation that is inappropriate or of poor quality, and withholding the right to work. Furthermore, as we highlighted in our reports 'Mind the Gap'<sup>9</sup> and 'Mind the Gap: One Year On'<sup>10</sup>, the 28-day move on period, the lack of a Duty to Refer for the Home Office, and other policies affecting newly granted refugees can also cause rough sleeping and homelessness.

Meanwhile, the new Strategy suggests that the review of the impact of full dispersal will take place through the ongoing Home Office-led consultation process. NACCOM and several other voluntary sector organisations have already expressed our disappointment at the timescale and scope of this consultation so far. The planned review of the full dispersal model will only effectively contribute to reducing rough sleeping if it considers a broader range of asylum support policies, and better engages with local actors - including NACCOM members - who provide vital support services to people in the asylum and immigration system who are sleeping rough.

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7 [https://homelesslink-1b54.kxcdn.com/media/documents/Unlocking\\_the\\_door\\_-\\_Roadmap\\_Report\\_2022\\_final.pdf](https://homelesslink-1b54.kxcdn.com/media/documents/Unlocking_the_door_-_Roadmap_Report_2022_final.pdf)

8 [https://homelesslink-1b54.kxcdn.com/media/documents/Unlocking\\_the\\_door\\_-\\_Roadmap\\_Report\\_2022\\_final.pdf](https://homelesslink-1b54.kxcdn.com/media/documents/Unlocking_the_door_-_Roadmap_Report_2022_final.pdf)

9 <https://naccom.org.uk/mind-the-gap-new-report-on-refugees-facing-homelessness-after-move-on-period/>

10 <https://naccom.org.uk/mind-the-gap-one-year-on-report-provides-fresh-evidence-of-refugees-vulnerability-to-homelessness-during-move-on-period/>

- ***Exhaust all options and the importance of immigration advice***

During the pandemic, many migrant rough sleepers with NRPF were accommodated by Local Authorities for the first time due to a national directive to take “Everyone In”. In ‘Unlocking the Door’<sup>11</sup>, to continue this momentum, we urged national Government to clarify the legal powers and expectations on Local Authorities to accommodate and support migrants with NRPF, and to provide a dedicated fund to ensure that a minimum level of accommodation provision could be provided to all rough sleepers, regardless of immigration status. Despite acknowledging the work done by certain Local Authorities looking to “exhaust all options” to support migrant rough sleepers with NRPF, the Strategy offers little indication that Local Authorities will be better equipped to unlock access to accommodation for this group between now and 2024.

Rather, the Strategy reiterates an unhelpful division, based upon an individual being in the UK “legally” and “illegally”, in determining the support offer for migrant rough sleepers:

***“For those here legally but with restricted eligibility for public funds, we want to see them get appropriate support to sustain a life away from the streets. For those here illegally, we want to ensure people return to their home country swiftly and receive the appropriate support to do this.”***

This approach is disappointing for several reasons. As pointed out by the Joint Council for the Welfare of Immigrants (JCWI)<sup>12</sup>, distinctions between those in the UK “legally” and “illegally” are unclear and often misleading. Meanwhile, cutting off the support options available to a person dependent on their current immigration status reduces the likeliness that an individual will settle their status and move out of homelessness long-term. In 2020-2021 alone, NACCOM members helped 344 appeal rights exhausted asylum seekers to access the support necessary to access either statutory support, asylum accommodation or some form of leave to remain.<sup>13</sup>

However, as we outlined in ‘Unlocking the Door’, the absence of immigration advice in preventive, street outreach and community settings remains a barrier for more rough sleeping migrants with NRPF being able to resolve their homelessness in this way<sup>14</sup>.

- ***Reforming existing support options***

The Strategy makes clear the Government’s intentions to increase take-up of the Rough Sleeping Support Service (RSSS) as the primary mechanism for clarifying and resolving the immigration status of rough sleeping migrants. Although light in detail on specifics, it also commits to improving the voluntary returns service, again with the aim of increasing engagement. The Strategy’s acknowledgement of the weaknesses of these services and introduction of various reforms addressing concerns around trust, transparency, and informed consent, is welcomed. It would be hoped that these reforms would enable those that engage with the services to do so with greater confidence. However, given the current lack of independent immigration advice and staff with the language skills to ensure that informed decisions are taken, both the RSSS and voluntary returns service may still be inhibited by challenges faced by potential clients in accessing independent immigration advice.<sup>15</sup>

11 [https://homelesslink-1b54.kxcdn.com/media/documents/Unlocking\\_the\\_door\\_-\\_Roadmap\\_Report\\_2022\\_final.pdf](https://homelesslink-1b54.kxcdn.com/media/documents/Unlocking_the_door_-_Roadmap_Report_2022_final.pdf)

12 <https://www.jcwi.org.uk/Handlers/Download.ashx?IDMF=5467543a-6e30-4e28-a39f-db48ffad6d3a>

13 <https://naccom.org.uk/wp-content/uploads/2021/11/NACCOM-ImpactReport-FINAL.pdf>

14 [https://homelesslink-1b54.kxcdn.com/media/documents/Unlocking\\_the\\_door\\_-\\_Roadmap\\_Report\\_2022\\_final.pdf](https://homelesslink-1b54.kxcdn.com/media/documents/Unlocking_the_door_-_Roadmap_Report_2022_final.pdf)

15 [https://homelesslink-1b54.kxcdn.com/media/documents/Unlocking\\_the\\_door\\_-\\_Roadmap\\_Report\\_2022\\_final.pdf](https://homelesslink-1b54.kxcdn.com/media/documents/Unlocking_the_door_-_Roadmap_Report_2022_final.pdf)

- ***Protections for victims of modern slavery***

Finally, the Strategy introduces various measures intended to address the potential risk of vulnerable individuals who are currently, or are at risk of, rough sleeping becoming victims of modern slavery. There are some positive changes that will bolster the housing support available to some victims of modern slavery, including changes to the Shared Accommodation Rate (SAR) of the Local Housing Allowance (LHA) and guidance helping Local Authorities understand the National Referral Mechanism (NRM) and how it interacts with statutory homelessness duties. We fear though that too many other victims and potential victims of modern slavery with NRPF will remain exposed to a higher risk of rough sleeping, homelessness, and further exploitation due to the wider failings of the Strategy.

**Conclusion:**

**‘Ending Rough Sleeping for Good’** welcomed for its strong emphasis on prevention, and its recognition that cross-departmental working will be vital to tackle the root causes of rough sleeping. The Strategy recognises the unique barriers that migrants can face when resolving their homelessness, and signals much needed reforms to two existing support options, the RSSS and the voluntary returns service.

However, by failing to properly address the complex and wide-ranging drivers behind migrant homelessness, many of which result from poor and, in some cases, deliberately harmful immigration policies, the Strategy ignores some of the key areas in which action is most needed to prevent rough sleeping amongst migrants.

