

# **DRAFT**

# **Cardiff Rough**

# **Sleeper Strategy**

# **2017-2020**



# Partners to the Cardiff Rough Sleeper Strategy 2017-2020:



South Wales Police  
Heddlu De Cymru



HUGGARD, Helping  
The Homeless



Connecting rough sleepers to local services  
0300 500 0914 [www.streetlink.org.uk](http://www.streetlink.org.uk)



Immigration Enforcement

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# Foreword



Along with partners, I am committed to significantly reducing rough sleeping in the city and will continue to bring about effective change. This Strategy aims to ensure that some of the most socially excluded people in Cardiff receive appropriate help and support when they need it most.

*Councillor Susan Elsmore*

Cabinet Member for Health, Housing & Wellbeing.

Welcome to the Cardiff Rough Sleeper Strategy 2017-20. The strategy recognises and builds on the excellent work that is already taking place to prevent and tackle rough sleeping, but I acknowledge that there are still too many people living on the streets in Cardiff. This document is a response to this issue and outlines the co-ordinated approach required to tackling and preventing rough sleeping in our city.

Sleeping rough is dangerous and can damage people's lives permanently. Life on the streets detrimentally impacts on physical and mental health and wellbeing and at present the average life expectancy of a rough sleeper is just 47 years of age, which is 30 years younger than the general population.

The longer an individual remains on the streets, the more likely that secondary issues such as begging, drugs or alcohol misuse can become an issue. These anti-social behaviours can also impact on citizens, businesses, workers and visitors to the city.

# Introduction

This Rough Sleeper Strategy will outline how people sleeping rough, often with complex lives and issues, can receive appropriate and accessible support, advice and homelessness assistance. It identifies what provision is currently available and how it can be improved to deliver a more wraparound service to the most vulnerable in society.

No-one chooses rough sleeping as a permanent lifestyle option. Many people will have held tenancies or been supported in specialist housing but have been unable to sustain or manage accommodation provided. This is often due to complex life experiences such as loss of job, family breakdown, bereavement, periods in care or prison, and serious health issues, or personal lifestyle choices such as substance misuse, criminal behaviour or street culture activities. These issues can often lead to a harmful cycle of multiple exclusions from services.

This document is structured around the 'customer journey' from identifying rough sleepers, engagement with services, provision of accommodation, through to independent living.

The Strategy sets out a number of ambitious activities to be undertaken by the Council and its partners over the next 3 years, listed as 'We Will' commitments throughout the document. These will be collated to inform an action plan to be taken forward and monitored in conjunction with the Cardiff Housing Strategy.

## Vision

This Strategy has the following ambitious vision:

***To work towards  
ending rough  
sleeping in  
Cardiff***

## Aims

This Strategy will deliver on the following aims:

To work to understand the causes of rough sleeping.

To work with partners to ensure support is directed towards ending and not reinforcing rough sleeping.

To ensure early intervention to prevent rough sleepers becoming entrenched.

To develop a range of accommodation and support solutions tailored to individual needs.

# Background

## Housing Issues in Cardiff

Cardiff Council and partners are facing unprecedented pressures to deliver accommodation options to those in the most housing need. These pressures come from reducing resources, high levels of homelessness, Welfare Reforms and a deceleration of housing development. The *Cardiff Housing Strategy 2016-2021* shows that:

- ⇒ There are nearly **8,300** households on the waiting list for social housing, of which 8% are homeless;
- ⇒ There are **450** new housing applications each month;
- ⇒ **2,700** families are living in severely overcrowded homes;
- ⇒ **600** homeless households are living in temporary accommodation or hostels including **378** families.

The Welsh Government provides Supporting People grant funding to assist vulnerable people to live independently and prevent homelessness. The Council administers the funds and commissions services such as hostels, refuges, supported housing schemes and tenancy support.

As both the capital and largest city in Wales, Cardiff experiences a high rate of homelessness. At the acute end, Cardiff has seen year on year increases in the number of rough sleepers.

- ⇒ Single night counts undertaken in London in 2016 recorded **964** rough sleepers, **23%** of the English national figure of **4,134**. Cardiff's 2016 single night count recorded **53** rough sleepers, representing **38%** of the Welsh total of **141**.
- ⇒ At **53** rough sleepers, Cardiff's 2016 single night count figure compares with areas such as Birmingham (**55**) and Bedford (**59**), but is not as high as Bristol (**74**) or Manchester (**78**). *Source: Rough Sleeping Statistics Autumn 2016, England (Dept for Communities & Local Government, 2017); National Rough Sleeper Count, November 2016 (Statistics for Wales, 2017).*

The challenge in taking forward services to rough sleepers and vulnerable people is to ensure consistent advice is given, that an awareness of all the services available is widespread and that collaboration is promoted wherever possible.



# Background

## Homeless Duties to Single Adults

New homelessness legislation was implemented on 28<sup>th</sup> April 2015 through Part 2 of the Housing (Wales) Act 2014. This Act places new duties on local authorities to help anyone seeking housing advice and assistance. The specific duties are:

### ***Duty to Provide Advice and Assistance:***

The Council has a duty to provide advice and assistance to anyone including persons from abroad. For rough sleepers this includes outlining the various accommodation options available, as well as support to access relevant benefits.

### ***Duty to Prevent Homelessness:***

The Council is required to work with eligible clients to try and prevent homelessness or secure alternative accommodation. For rough sleepers this may include facilitating mediation with family members or addressing issues such as rent arrears.

### ***Duty to Help to Secure Accommodation:***

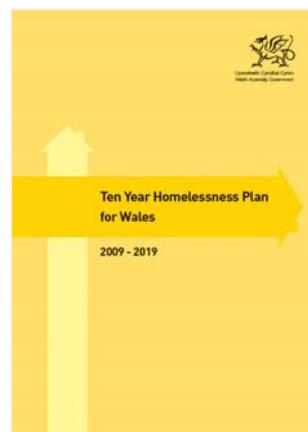
Where homelessness cannot be prevented, the Council must assist all eligible households to find suitable alternative accommodation. This may include assisting access into the private rented sector, or supported housing for those deemed vulnerable, as defined by the legislation.

### ***Duty to Secure Accommodation:***

Where alternative accommodation has not been found under the previous duties, most single people without dependents would fail to qualify under this duty, again unless they were deemed vulnerable. While the Council has no duty to provide it, Cardiff has access to a range of accommodation for single people (see page 23).

Although the wider duties do assist the majority of single homeless people, rough sleepers are not directly addressed within the Housing (Wales) Act.

However, Part 2 of the Act places a duty on local authorities to carry out local homelessness reviews and formulate local strategies. This includes an expectation for a specific strategic focus on rough sleeping. An action has been included in the Cardiff Housing Strategy 2016-2021 to develop a Homelessness Strategy by June 2018. This Rough Sleeper Strategy has been developed first to address the pressing issue of rough sleeping in Cardiff.



The Welsh Government *Ten Year Homelessness Plan for Wales 2009-2019*, identifies 5 key objectives that have helped to shape this Rough Sleeper Strategy:

- ⇒ Preventing homelessness wherever possible;
- ⇒ Working across organisational boundaries;
- ⇒ Placing the service user at the centre of service delivery;
- ⇒ Ensuring social inclusion and equality of access to services;
- ⇒ Making the best use of resources.

# Background

## Research

A number of research studies have been undertaken looking into the reasons for rough sleeping; the support needs of these individuals and experiences of violence and abuse on the streets.

The 2011 Joseph Rowntree Foundation report 'Tackling Homelessness and Exclusion—Understanding Complex Lives' explores the interaction between homelessness and other social issues. Evidence was collected by research projects in 7 UK cities, including Cardiff. The report identifies:

- A strong overlap between more extreme forms of homelessness and other support needs, with nearly half of service users reporting experience of institutional care, substance misuse and street activities such as begging, as well as homelessness.
- People with complex needs are at serious risk of falling through the cracks in service provision. There needs to be an integrated response across health, housing and social care.
- A need to move from compartmentalised and organisationally driven approach towards an individualised approach.

In 2016, Dr Peter Mackie of Cardiff University undertook research on 'Transitory Single Homelessness in Wales'. This study looked at the scale of movement of single homeless people, where they were coming from and the influences behind people seeking housing assistance in areas where they have no local connection.

Examples of the range of factors identified:

**Push** - loss of employment, transient lifestyle, relationship breakdown.

**Pull** - know someone in the area, a fresh start, belief that coming to the city would offer more services.

The 2016 Crisis study 'It's no life at all – Rough Sleepers' experiences of violence and abuse on the streets of England & Wales' conducted face to face interviews with 458 homeless people who had experienced rough sleeping in the previous 12 months. Focussing on the extent and impact of incidences of crime and anti-social behaviour, the report identified that:

- 77% were victims of anti-social behaviour
- 30% had experienced violence
- 6% had been sexually assaulted
- 45% had been intimidated or threatened with violence / force
- 56% had been verbally abused
- 51% reported damage to / theft of personal property.

The Wallich are currently undertaking consultation with existing and former rough sleepers in Cardiff, to identify the barriers they experienced when accessing accommodation and support services. The outcomes of this consultation will be considered by the Council to review pathways into services as necessary.

### ***We Will:***

- Continue to benchmark with other local authorities to review and adopt relevant best practice.
- Consider the findings of relevant research and pilot projects to inform future service provision.

# Identifying Rough Sleepers

## Reporting Rough Sleepers

The Council welcomes referrals from the public and professionals who have information or concerns about anyone they believe to be sleeping rough anywhere in the city. Dedicated contact options for the Homeless Outreach Team are advertised on the Council website ([www.cardiff.gov.uk/homelessnow](http://www.cardiff.gov.uk/homelessnow)), including a direct e-mail address ([roughsleeping@cardiff.gov.uk](mailto:roughsleeping@cardiff.gov.uk)). This referral route has proved effective in identifying previously unknown clients and/or locations.

Another option is the Streetlink Cymru service. This website and mobile phone app allows the public to report the location of a presumed rough sleeper to a central service. The information is then passed to the relevant Council who investigate and visit the location within 3 working days.

Unfortunately, not all referrals received contain sufficient detail to act upon the intelligence. Since its launch, Cardiff has received 401 referrals via Streetlink Cymru, of which only 2 have provided information on rough sleepers previously unknown to the Homeless Outreach Team.

**We Will:** Improve the visibility of the Homeless Outreach Team's contact details on the Council website.

## Ongoing Monitoring

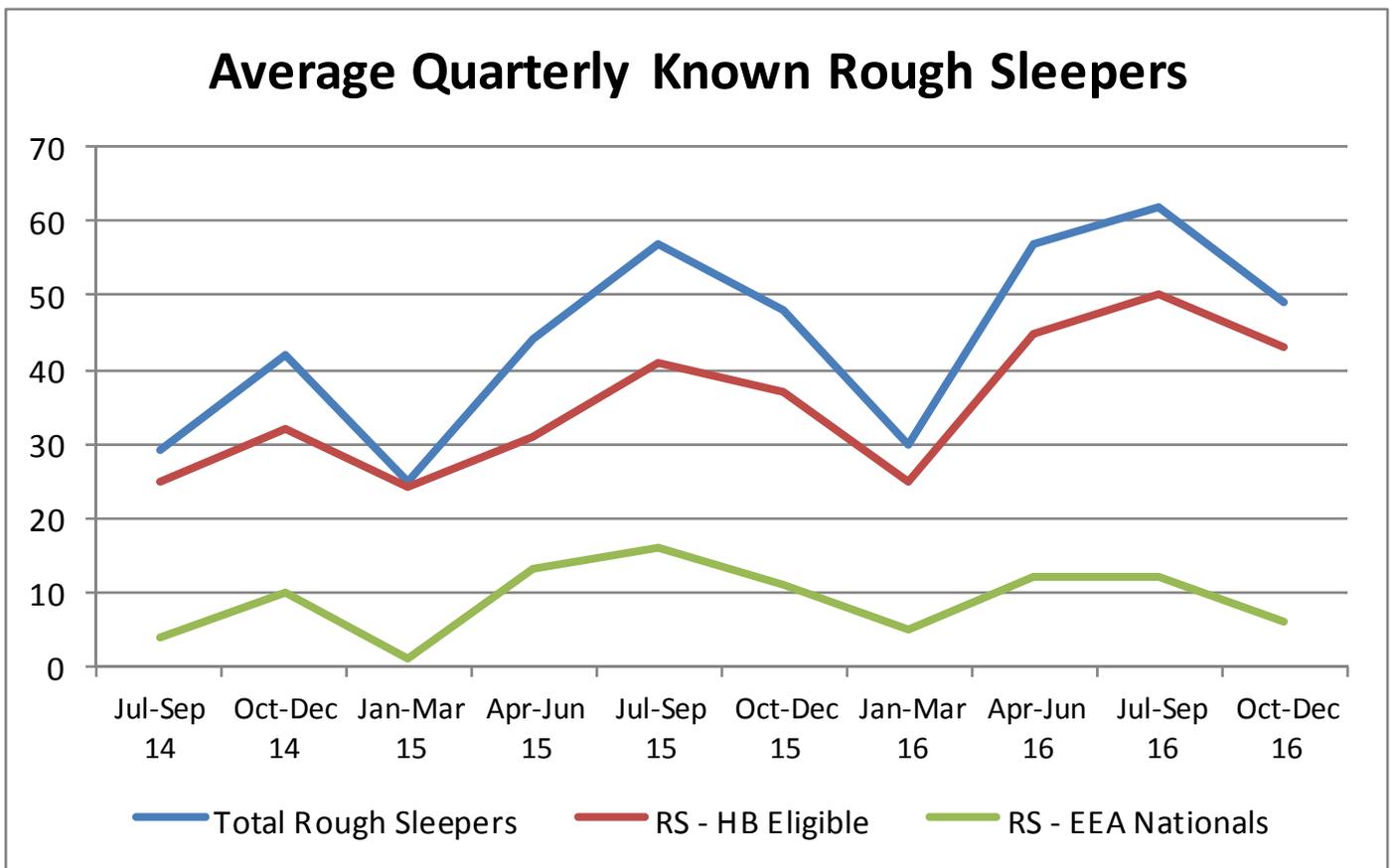
The Council's Homeless Outreach Team work alongside a variety of third sector organisations to seek out and support rough sleepers. Together with staff from The Wallich, Council outreach staff take breakfast to and engage with rough sleepers every morning at known locations.

Details of all individuals observed are recorded and data is combined with information from partners. Along with intelligence from the Police and other sources, this data builds up a picture of rough sleepers.

This daily monitoring shows that over the last 2 years, the number of people sleeping rough in and around the city centre has steadily increased. During one week in August 2016 this figure peaked at 68 individuals, with the whole of August averaging 60 individuals per week, the highest numbers ever recorded in Cardiff.



# Identifying Rough Sleepers



Source: Cardiff Council Homeless Outreach Team 2017

The graph demonstrates the changing trend of rough sleeping over the past 2 years. It shows seasonal fluctuations, with numbers decreasing in the winter months in line with Cold Weather Provision (see page 21). However, the overall trend is an upward one, with the exception of a levelling off of European Economic Area nationals sleeping out since April 2016.

## Client Demographics

As at 28th October 2016 there were 52 known individuals sleeping rough:

- 46 were males and 6 females;
- Almost half (25) were aged under 35;
- 37 were White Welsh; 3 White British; 1 White Irish; 1 Mixed Race and 10 were EEA nationals;
- A third (17) were classed as entrenched (see page 11);

- 26 people had a local connection to Cardiff; 11 to other South East Wales authorities; 3 to England; 10 to EEA countries; 2 were not known. Source: Cardiff Council Homeless Outreach Team 2016

This snapshot includes classifications of rough sleepers, as described below.

### Those New to Sleeping Rough

As the Welsh capital, Cardiff attracts many people wanting a new start. However, when jobs and housing are not as readily available as anticipated, some find the only option is to sleep rough. Similarly those already resident here who experience a significant life-changing event such as job loss or relationship breakdown with partner or parents, also may find themselves on the streets. With early identification these individuals can be supported and avoid the often harmful cycle of homelessness.

# Identifying Rough Sleepers

The Outreach Team aim to identify and engage with new rough sleepers on the same day and respond to all other referrals within a target of 3 days. Anyone wanting to access services will have immediate access to emergency bedspaces.

## Long Term Rough Sleepers

Whilst efforts are made to get people into accommodation at the earliest opportunity, due to a variety of reasons, a significant proportion of people sleeping rough do not engage with services. Whilst contact with most clients will result in positive change over time, there are still many individuals who have additional barriers and personal circumstances that can lead to a longer term problem. Chaotic lifestyles and complex needs can result in an inability to maintain accommodation once provided, or failure to maintain any form of accommodation for extended periods of time. For the purpose of this strategy, the group is split into two different categories:

### **Periodic Rough Sleepers:**

Clients who have 3 separate periods of rough sleeping. Such clients have multiple spells of rough sleeping and are recognised as being at high risk of becoming entrenched.

### **Entrenched Rough Sleepers:**

Clients who have been rough sleeping for 6 months or more. Currently, this applies to approximately a third of rough sleepers in Cardiff. Although entrenched, efforts continue to be made to engage and encourage people into services.

### **Case Study: Entrenched Rough Sleeper**

PJ was last accommodated in a hostel, which he abandoned as he found it too chaotic. He has slept rough ever since, a period of approximately 12 years. PJ has been made many offers of housing during this time, but has declined them all.

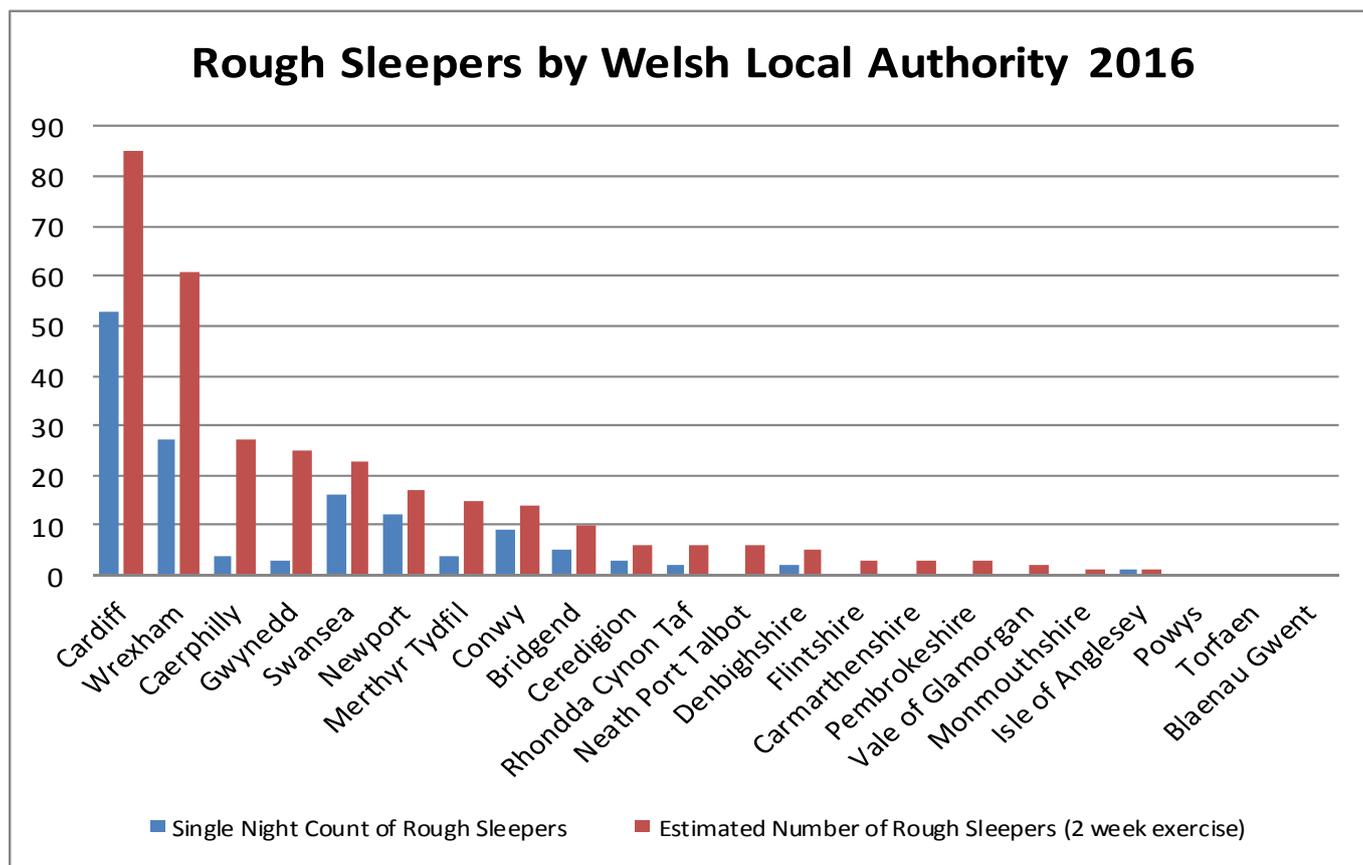
The Outreach Team continually remind PJ that he has options open to him but he gets easily annoyed if he feels pushed. The priority has to be to maintain a supportive, trusting relationship with him in order to keep him as safe and well as possible.

The Outreach Team assisted PJ to make claims for welfare benefits so he can now support himself with food and hot drinks through the day without having to access soup runs. PJ lives a very insular life; this is the way he copes with the mental health issues at the root of his street homeless lifestyle. PJ continues to be monitored for any signs of diminished mental capacity around his decision to live on the streets.

### European Economic Area (EEA) Nationals

Due to a change in legislation in January 2014, many single EEA nationals without worker status or recourse to public funds sleep on the city's streets. When Cold Weather Provision is not available, they comprise around 20% of all rough sleepers. These clients are still supported by the Homeless Outreach Team, however, their accommodation options are limited due to ineligibility for Housing Benefit and lack of employment.

# Identifying Rough Sleepers



Source: National Rough Sleeper Count, November 2016 (Statistics for Wales, 2017)

## Veterans

The Council is a signatory of the Armed Forces Covenant. Homeless assessment and outreach processes have been developed to identify those who present from the Armed Forces and ensure they are signposted to appropriate support.

## **Annual Count**

The Welsh Government requires local authorities to regularly report on the scale of rough sleeping in their area to inform national responses to this issue. A date is identified each year and, following set guidance, local authorities undertake a count of individuals sleeping rough during that night. This is supplemented with a two-week exercise to estimate numbers from all intelligence available.

The graph above shows the results of the 2016 Wales-wide count. Based on the estimated number of people sleeping rough over the *2 week period*, Cardiff was one of only four Welsh local authorities with a rate of over 2.0 rough sleepers per 10,000 households, compared to the Wales average of 1.0.

Cardiff's figures for the last 3 *single night counts* show an upward trend in the number of rough sleepers actually observed, with 26 individuals recorded in 2014, 30 in 2015 and 53 in 2016.

# Early Intervention Options

Cardiff has a wide variety of services delivered by the Council, third sector and voluntary organisations operating in the city, which support vulnerable people and those affected by homelessness. There is a need to better coordinate and focus these services on early identification of rough sleepers and taking timely and appropriate action to help people off the streets.

## The Homeless Outreach Team

The Council's Homeless Outreach Team goes out daily between 6am and 9pm to engage with people who are currently, or who are at risk of becoming, rough sleepers. The 'guide for homeless people in Cardiff' is given to all those encountered. Due to the nature of many clients, engagement can be difficult and requires perseverance from staff to connect with and support the client.

The Outreach Team works throughout the city with other outreach agencies, providing assistance to access accommodation options and services such as Health (both physical and mental) and Social Care where an issue is identified needing intervention. Although data is shared between services, an improved approach is required to fully record the interactions and offers of support made to individuals.

### We Will:

- Expand the Outreach Team to provide a case management approach to rough sleepers.
- Improve data sharing between agencies involved with rough sleepers.
- Work towards 'No First Night Out' for those who engage with services.

### Guide for homeless people in Cardiff

<p>› HANR Outreach Services</p> <p>(Advice and services for homeless and vulnerable adults). Housing Options Centre (HOC), Hansen Street, Cardiff, CF10 5DW</p> <p>Freephone: <b>0808 100 1327</b></p>	<p>› Breakfast Run</p> <p>Daily service from 7am checking known sites in &amp; around Cardiff. Based at the Old Museum toilets, Museum Avenue from 8.15am</p>	<p>› The Bus Project - Museum</p> <p>Sunday 5.30 – 8.00pm Monday – Thursday, 6.30 - 9.00pm</p>	<p>› The Soup Run</p> <p>Every evening from 8pm, Charles Street (rear of M&amp;S)</p>	<p>› Street Pastors</p> <p>Every Friday &amp; Saturday night from 10pm - 4am in the City Centre.</p>
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# Early Intervention Options

## **Third Sector Services**

The following third sector services are grant funded by the Welsh Government and the Council and work closely with the Homeless Outreach Team.

### **Rough Sleeper Intervention Team**

This service, operated by The Wallich in partnership with the Council's Homeless Outreach Team, is more commonly known as the 'Breakfast Run'. Staff go out each morning to engage with rough sleepers through the provision of breakfast and other welfare items.

### **Bus Project**

Established in 2002, this service is delivered by the Salvation Army, Sunday to Thursday evenings every week. As well as access to out of hours emergency accommodation, this service also provides food, access to advice, advocacy, medical support including needle exchange and chaplaincy. The Bridge Project substance misuse outreach worker provides a surgery via the Bus Project and links in with all other outreach services.



### **Huggard Day Centre**

The facility provides an open access day centre for rough sleepers 365 days a year

where they can access a variety of advice and support, from basic welfare provision to diversionary activities and access to training and development. Services include:

- Reception Service: Meeting the immediate and basic needs of clients, supporting them to engage with accommodation and support services;
- Support and Rehabilitation: Addressing barriers to engagement and breaking dependence on street culture activities. Providing diversionary and development opportunities;
- Development and Training: Developing confidence, social skills and employability in an attempt to break the cycle of homelessness through an extensive range of activities and training.

The Huggard Day Centre has an Advocacy service which provides a direct access drop-in to deal with any issue a homeless or vulnerably housed person may present with. The advocate works closely with partner agencies and regularly receives referrals where specific support needs have been identified that can be a barrier to accessing accommodation or services, such as complicated benefit claims.

The Centre also provides a Substance Misuse project for rough sleepers that follows a harm reduction programme. This service provides low threshold, open access support from the provision of a needle exchange service to advice, support, stabilisation and engagement in formal treatment services.

# Early Intervention Options



## **Voluntary Provision**

There is also a range of voluntary and non-grant funded assistance available in Cardiff.

### **Faith Groups**

There is a long history of faith groups providing 'soup runs' for rough sleepers in the city, taking turns to give out hot food on weekday evenings. The services provided by faith groups has increased significantly in recent years to include approximately 12 cold weather beds in churches over the winter months, food parcels, free clothing, haircuts and personal hygiene products.

### **Street Pastors**

Cardiff Street Pastors initiative is delivered by local churches, working with the Police, the Council, Health and local businesses. Street Pastors are volunteers, trained to prevent anti-social incidents and support people to access services or transport. Cardiff Street Pastors recognise many of the entrenched rough sleepers and will offer blankets and signpost them to services.

### **Community Initiatives**

A range of different community-based initiatives provide services and assistance to rough sleepers, often on an ad-hoc basis.

### **Homeless Alliance**

The Homeless Alliance was formed in 2013 to try to coordinate these services alongside statutory and other partners.

## **Working Together to Get People Off the Streets**

There is clearly a wealth of services assisting rough sleepers. However this activity needs to be refocussed and better coordinated. A new approach is needed to divert people away from options which encourage dependency and reinforce rough sleeping, and to realign services towards helping people to achieve the confidence required to live independently.

More can be done to further integrate current provision, using partners' respective specialisms to support homeless people. For example, Faith groups may be best placed to befriend individuals on a 1-1 basis to divert them into activities, employment and socialising. A more intensive, wraparound and collaborative approach to supporting rough sleepers, especially new individuals, to move off the streets, will improve the likelihood that they are diverted from a harmful lifestyle and achieve better outcomes.

### ***We Will:***

- Strengthen the joint-working response, coordinating and refocusing all partners' efforts on getting people off the streets.
- Develop procedures for closer partnership working with Faith groups.
- Explore options to develop diversionary / befriending services.

# Early Intervention Options

## Complex Needs

The majority of entrenched and repeating rough sleepers that are being supported within the city are not homeless because they do not have a roof over their head, but because they have repeatedly been unable to sustain or manage accommodation provided.

The Council and its partner agencies have recognised an increase in the number of presentations where the lead need is identified as mental health. A significant number of these presentations also have coexisting substance misuse related needs.

Partners acknowledge the need to ensure that mental health and substance misuse support within hostel provision meets the needs of the client, and that appropriate placements are made for the level of support required. A joint review of the current provision and pathway is currently underway between the Council's Housing and Social Care Services working with Health colleagues. Two specialist mental health professionals have been engaged to undertake the review. This will include:

- Use of an improved support needs assessment to ensure identified support needs are met.
- An in-depth analysis of what support is actually offered in hostels and supported housing schemes.
- Devising criteria to improve matching of client need with appropriate placement.
- To act as specialist advisors to staff to assist with referrals.
- To identify gaps in existing accommodation provision.

This review will inform future provision and develop a clear pathway for individuals with discrete needs.

### **Case Study: Substance Misuse Joint Outreach Pilot**

During October 2016, the Council's Homeless Outreach Team undertook 4 sessions (one per week) of street-based joint outreach with TAITH. TAITH are commissioned by the Substance Misuse Area Planning Board (APB) using Welsh Government grant funding to offer advice and support to help people make informed decisions regarding their substance use. Services include harm reduction strategies; one-to-one interventions; semi-structured group work; needle exchange and blood borne virus testing. The pilot resulted in:

- 10 Entry to Drug and Alcohol Services (EDAS) referrals;
- 3 direct access EDAS appointments;
- 12 clients being signposted to TAITH.

### ***We Will:***

- Develop a support pathway through services for clients with mental health/substance misuse issues.
- Review and improve partnership working between the statutory and voluntary sectors to address complex needs.
- Build upon the success of the substance misuse pilot and explore further options for joint outreach with specialist partner agencies.
- Develop a specialist pathway through services for females at high risk of exploitation.

# Early Intervention Options

## Vulnerable Persons Multi-Agency Intervention

In collaboration with partners, the Council has developed a range of intervention procedures for individuals where there is heightened concern relating to their safety and wellbeing. These procedures are implemented through a referral process which triggers a multi-agency response. An action plan is agreed to put in place appropriate interventions until an acceptable outcome has been reached. Issues can be escalated to senior management within each partner organisation where a situation and the potential consequences are deemed critical. There are 4 stages to this pathway:

**Stage 1:** Access Panel – multi-agency meeting to discuss all clients referred due to exclusion from Frontline accommodation

**Stage 2:** Falling Through the Net – multi-agency meeting to discuss an individuals concerns and risk.

**Stage 3:** Accelerated - expedite consultation with senior management where the need is identified.

**Stage 4:** Blue Light – provide emergency intervention where it is assessed that a person's circumstances pose a serious and immediate life threatening risk.

To improve early intervention, the criteria for these procedures need to be strengthened. Whilst referrals into the service can be made at any time, they will automatically be made for all those at risk of long term rough sleeping.

**We Will:** Further develop the multi-agency procedures to identify and intervene with those who sleep rough on 3 separate occasions, or continuously sleep rough for 3 months.

## Health and Social Care Services

It is widely accepted that rough sleeping significantly impacts on individuals' physical and mental well being. In Cardiff, the following well-established services work with outreach services and accommodation providers to help address the needs of the most vulnerable in society:

### Homelessness Nurse

The homelessness nurse provides healthcare intervention via the medical suite at the Council's Housing Options Centre and in hostels. As well as offering treatment and services such as sexual health and blood-borne virus screening, referrals are made to specialist services, such as dentistry, as required.

### Cardiff Alcohol Treatment Centre

The Alcohol Treatment Centre is a nurse-led service based in the city centre, which assesses, treats and monitors intoxicated individuals. The centre was developed through a broad partnership including Health, the Police and the Council.

### Mental Health Assertive Outreach Team

The team assists individuals and professionals to overcome barriers to assessment and treatment for vulnerable adults with complex needs.

# Early Intervention Options

## City Centre Social Work Team

This team works with vulnerable homeless individuals with social care needs and/or complex health needs, including a small number of service users with no identifiable accommodation move-on option. The team engage with service users to work towards completing an Integrated Assessment and provide interventions based on need and appropriate packages of care.

## The Bridge Programme

The Bridge Programme is a unique service designed to provide access into substance misuse treatment for marginalised and hard to reach clients. With integrated specialist outreach workers, the programme offers rapid access to a wide range of treatment options including brief interventions, assessment and structured treatments. It also provides support to access hostel accommodation; Naloxone; blood borne virus screening and needle exchange.

The programme offers on average 50 plus treatment places a year. Approximately 80% of service users have either been directly engaged from rough sleeping or have had experience of rough sleeping within the last 12 months.

## **Reconnection Service**

Cardiff recognises that not all rough sleepers will have a local connection to the area for housing purposes and that some individuals come to Cardiff because of a lack of provision in other authorities. All rough sleepers in Cardiff are given advice and assistance regardless of their local connection status.

However, monitoring of the impact of the new legislation indicated that, in 2015 the number of people sleeping rough or accessing emergency accommodation in Cardiff, who were from other Welsh local authority areas, was increasing. This led to the development of the Reconnection Service delivered by the Salvation Army to support individuals with no local connection to return to their home authority in a managed way, or to achieve another positive accommodation outcome.

Accommodation may be provided for an individual with no local connection either for one night or temporarily via a waiver to access specialist provision only provided in Cardiff, or because of overwhelming vulnerability, health or social care grounds. The table below shows Service outcomes for November 2015 to November 2016:

Outcome	Clients
Reconnected to friends and family	33
Did not engage with Reconnection Service	27
Reconnected to make presentation at own Council	26
Offered supported accommodation via wavier or re-assessment	25
Supported to move into private rented accommodation	5
Case pending	5
Other e.g. Hospital/Prison	3
<b>Total</b>	<b>124</b>

People have been reconnected from as far apart as Barry to Brussels.

# Early Intervention Options

## Case Study: Reconnection Service

PG is a 38 year old male whose local connection was established as South East Wales. PG was previously known to homeless services in Cardiff and had been identified as having drug and alcohol issues. Reconnection staff engaged with PG during an outreach surgery at the Bus Project. They supported PG to attend the Council's Housing Options Centre, where he was assessed and referred into the Reconnection Service.

The Reconnection Service then worked with PG to re-establish ties with his mother, who agreed to offer PG accommodation whilst he presented to his local authority. Staff also contacted the local authority to seek advice, arrange an appointment for PG and to ensure he would be able to access drug and alcohol services in the Borough. PG is now settled in a hostel in his home area. He remains abstinent and is in regular contact with his family.

### **We Will:**

- Continue to monitor local connection for all clients.
- Build on the success of, and ensure the sustainability of, the Reconnection Service.



## Police and Other Intervention

### UK Visas and Immigration

Rough sleeping is considered an abuse of free movement rights, as defined in European legislation and case law. EEA nationals found to be rough sleeping may therefore be subject to administrative removal via Home Office procedures.

A joint working protocol between the Council, Police and the UK Visas and Immigration service has been prepared, using guidelines developed from Home Office policy, to reduce the numbers of Non UK/Republic of Ireland EEA Nationals sleeping rough in Cardiff (see Appendix A).

This protocol formalises the procedures for identifying and supporting EEA national rough sleepers to claim appropriate benefits, access employment and accommodation or to voluntarily reconnect them to their country of origin. Tailored support is at the heart of this collaborative approach and a full assessment of an individual's needs will be undertaken by partners.

However, where clients disengage from services, or are assessed as unlikely to break the pattern of rough sleeping, information sharing will take place to ensure that administrative removal takes place in a safe and planned manner.

**We Will:** Implement the Joint Working Protocol with Police and Immigration services.

# Early Intervention Options

## **Case Study: EEA National.**

VL had arrived in the UK in August 2016, moving transiently around the UK, looking for work and rough sleeping before arriving in Cardiff. He was distressed and unkempt when presenting, he had hoped to gain employment but had been unsuccessful causing deterioration in his health and an increase in his alcohol use. VL requested a return to Romania to reside with his family.

The Reconnection Service worked with the Huggard Advocate to book VL's ticket. VL's journey was over the Christmas period, taking around three days, so he was given a warm coat and a large food parcel to make his journey easier. The Reconnection Service also provided VL with a full travel map including details of all his travel times and connecting coaches. VL returned successfully to Bacau, Romania and is now residing with his family.

PSPOs have been considered elsewhere to place a general Order on whole towns to restrict certain behaviours such as leafleting/advertising, busking, begging, and rough sleeping. Many of these proposals have been abandoned due to public concern, but some limited Orders do exist. The Council and its partners will monitor any Orders in place to assess their success.

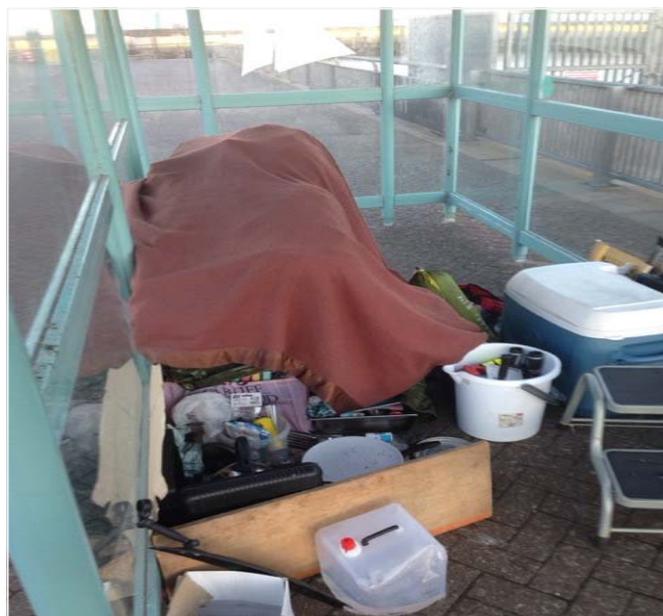
**We Will:** Closely monitor the use of Public Space Protection Orders in force in England and Wales.

## **South Wales Police**

Designated Public Place Orders (DPPO) prohibit drinking in certain areas designated by the Council and are enforced by the Police. A city centre DPPO was implemented in Cardiff in 2010.

## **Local Authority Powers**

The Highways Act 1980 allowed local authorities to implement Public Path Gating Orders to restrict access to alleys and lanes which experienced anti-social behaviour such as fly-tipping and burglary. The Council has implemented over 100 such Orders across Cardiff. Since the introduction of the Anti-social Behaviour, Crime and Policing Act 2014, these have been replaced by Public Space Protection Orders (PSPOs).



# Accommodation Options



## Emergency Accommodation

All outreach services share the same aim of engaging individuals to support them to access accommodation whether emergency overnight stays or a hostel bedspace, as soon as possible. In total, Cardiff has 45 emergency bedspaces across 4 providers available all year round:

- **12** bedspaces are based within the Wallich Nightshelter.
- The Wallich also provide **3** emergency spaces within Sir Julian Hodge hostel.
- There are **8** bespoke 'pods' delivered at Ty Tresillian hostel (see above).
- **12** emergency spaces are delivered by the Huggard in addition to **8** pods.
- **2** emergency spaces are provided at the YMCA hostel.

Access to this emergency provision is managed by the Housing Options Centre, or out of office hours through Outreach Staff, the Breakfast Run, the Night Bus or via direct presentations to Ty Tresillian.

## Cold Weather Provision

Since the mid 1990s Cardiff has operated a Cold Weather Provision scheme to provide additional overnight accommodation to further assist rough sleepers during the cold winter months. In 2016, 52 bed spaces were made available, partly funded by the Welsh Government Transition grant:

- **20** on Huggard Day Centre floor space.
- **12** floor spaces at Ty Tresillian.
- **12** plus spaces provided by churches.
- **4** spaces at the Salvation Army's Ty Gobaith hostel.
- **4** spaces at the YMCA hostel.

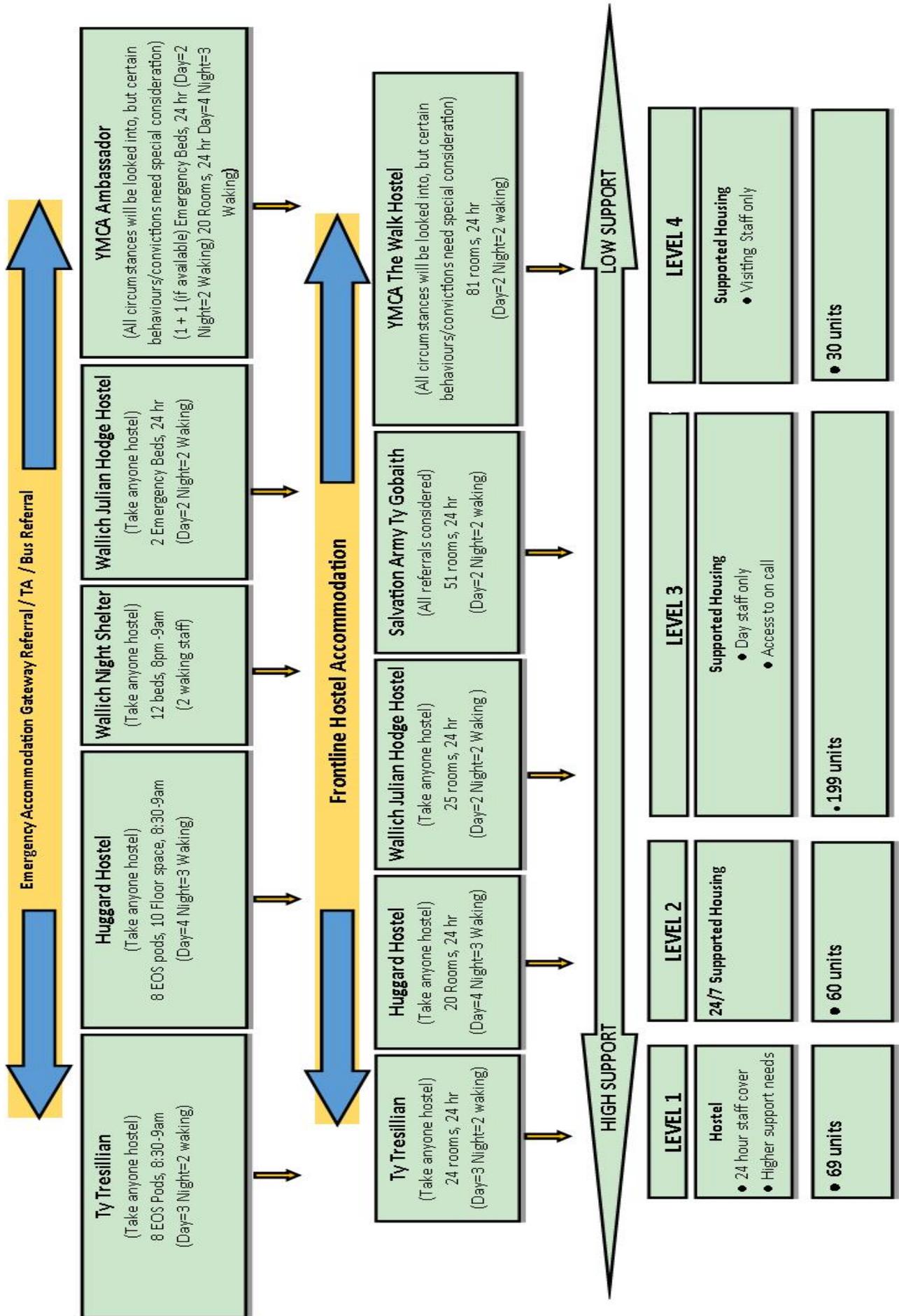
Some rough sleepers are however reluctant to use emergency accommodation.

### ***We Will:***

- Review accommodation options for rough sleepers.
- Gain a better understanding of the issues with emergency accommodation, to facilitate people coming off the streets.

# Accommodation Options

## Accommodation Options for Homeless, Single Adults



# Accommodation Options

## Hostel Bedspaces

Having accessed emergency provision, the current pathway is into existing vacant hostel, or other supported housing spaces. Cardiff has 5 large hostels that cater for single people and occasionally couples:

Hostel	Provider	Beds
Ty Tresillian	Cardiff Council	24
Cardiff YMCA	YMCA	81
Ty Gobaith	Salvation Army	66
Sir Julian Hodge	The Wallich	25
Huggard Hostel	Huggard	20

Although they all deliver generic housing-related support, some hostels specialise in addressing substance misuse, for example. Individuals may have to remain in emergency accommodation until a vacancy arises in the most suitable hostel identified to support their needs. A review of these larger hostels is underway to ensure that the best use is being made of this expensive resource. Hostels are required to support clients and be accessible 24 hours a day and therefore a substantial element of Supporting People Grant funding is used to deliver these bedspaces.

## Supported Housing

The chart on the previous page shows the various types and range of accommodation based support services available for single homeless people. In total there are 559 bed spaces funded by Supporting People Grant to deliver specialist supported accommodation and move-on schemes to prepare people for independent living. Schemes can specialise in mental health, substance misuse and offending behaviour.

Some, including hostels, offer units that prepare clients for access to training and work, often with a discounted rent and provision of packed lunches and suitable work attire.

### Case Study: Ty Cornel

Ty Cornel was originally developed to meet a gap in provision for a cohort of long-term street homeless people with existing substance misuse problems, which had resulted in significant physical disabilities. This partnership scheme with Adult Social Services uses joint funding to deliver housing and social care, with referrals made via the City Centre Social Work Team.

## Single Person Accommodation Gateway

Access into all hostel spaces and beyond is facilitated through a coordinated referral system, known as the Single Persons Gateway. This is one of a number of gateways developed to ensure that homeless people with particular issues or vulnerability can access the service best suited to their needs.

The Single Person Gateway provides a 24 hour, central point of access into accommodation, operating from the Council's Housing Options Centre. This co-location ensures that everyone has access to a statutory homeless assessment in accordance with current legislation. The assessment process also covers other health and support needs, to ensure the most suitable onward placement is made.

# Accommodation Options

The more entrenched rough sleepers are reluctant to access the services available at the Housing Options Centre and therefore miss out on priority services that a statutory homelessness assessment would provide. The Outreach team are best placed to carry out these assessments for rough sleepers, to ensure they have the same level of service as other homeless people.

**We Will:** Formalise arrangements for Council Outreach staff to undertake statutory homelessness assessments, giving clients access to services based on priority need.

Single Persons Gateway data is continually monitored and is being used to inform the Accommodation and Support Review into all Supporting People funded services. The Review aims to make improvements in how services are accessed, used and monitored and will also review other grant funding arrangements. This work will inform the development of new pathways for those with additional needs, such as mental health, and identify gaps in service which can then be appropriately procured.

## Young Persons Gateway

Unlike some major cities, Cardiff does not have high levels of young people needing to sleep rough. The Homeless Outreach Team work with Children's Services to report any children or young people encountered, who may be truanting or reported as missing. Young people under 18 years old found to be sleeping rough will be given automatic priority and taken to Children's Services. The Police will be contacted if appropriate.

Young people leaving the care system or who have become homeless due to relationship breakdown with family or friends can be assisted through the 'Young Person's' Gateway. The Council's Homeless Service and Children's Services have a partnership with Llamau to provide the initial advice and assistance needed to access suitable accommodation or to provide mediation to help resolve difficult relationships. Young people are also offered an assessment with a co-located Social Worker to ensure all welfare needs are addressed.

The Young Person's Accommodation Gateway is managed by the Council's Housing Options Service and has access to a range of specialist supported accommodation for those aged 16-25, with suitable placements made dependent upon need. Once ready to move on, young people are encouraged to attend a 'training tenancy' session to provide them with the skills to manage their own tenancy.

### **We Will:**

- Use the Single Persons Gateway to monitor usage of emergency provision to encourage move on and inform recommissioning.
- Establish refined support pathways for rough sleepers.
- Review all funding used to support homeless services to ensure sustainability and that outcomes are clearly understood and monitored.
- Develop a support service specification to prepare for recommissioning homeless hostels.
- Offer funding to pilot innovative new solutions to rough sleeping.

# Independent Living

## Housing First

Many people who experience rough sleeping can remain isolated on the streets as they do not want to be accommodated in hostels. A model that has received acclaim is Housing First, which started in America and has been adopted across the world. The concept is aimed at chronic rough sleepers and those who cannot break the cycle of homelessness by prioritising a move straight from the streets into a home; the concept being that if chaos is eliminated from a person's life, clinical and social stabilisation can occur faster and be more enduring.

### Case Study: Tŷ'r Afon Project

ST had been rough sleeping for many years. Over time, the Outreach Team built up a bond with him and he eventually engaged with the service. ST was referred into the Tŷ'r Afon project. ST settled in well, becoming more confident and requiring only limited support.

ST moved on to his own accommodation where, unfortunately, he was subjected to bullying and abuse. In response, he became isolated and disengaged with support services. He eventually abandoned the property and returned to sleeping rough.

After a very short period, ST began to work with outreach staff again and a second referral was made to the Tŷ'r Afon Project. Following a successful period of support, ST moved into his own flat, maintaining contact with all services. He also started to volunteer with various homeless charities in Cardiff. ST is much happier at this accommodation, has grown in confidence and is well on his way to full independence.

In Cardiff an alternative accommodation model has been developed under the principles of the housing first model. Although the accommodation is temporary rather than a full tenancy, Tŷ'r Afon places people directly in their own self-contained flat without preconditions and without them needing to move through different levels of housing in a staged approach to independent living. The table details outcomes for the Project since its establishment in February 2011:

Outcome	Clients
Positive move to permanent Council accommodation	9
Positive move into private rented sector	10
Positive move into supported accommodation	5
Positive move into temporary accommodation	1
Positive move family reunion	1
Abandoned by resident	4
Evicted	5
Other	3
<b>Total</b>	<b>38</b>

The project has achieved positive resettlement for clients who had previously failed to engage or maintain other homeless provision, offering strong support for the development of similar schemes.

**We Will:** Further develop independent living solutions utilising the principles of Housing First and investigate the feasibility of adopting the full model.

# Independent Living

## Common Waiting List

The Cardiff Housing Allocation Scheme manages how social housing is allocated. Applicants join a waiting list and are prioritised according to need. Where there is no fixed abode, clients can register using a 'care of' address, which can be a hostel or the Homeless Outreach Team.

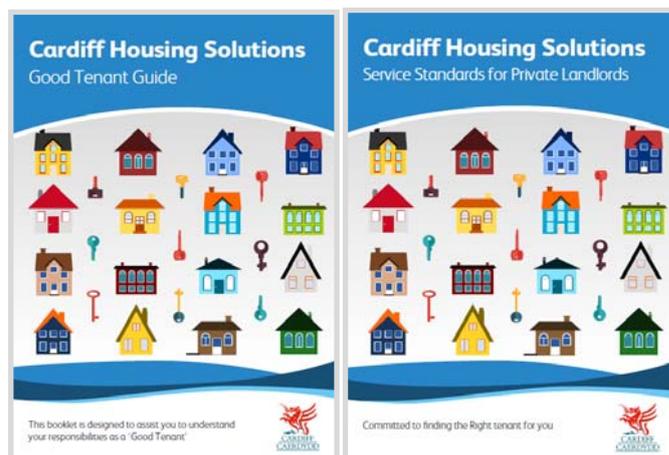
Offers of accommodation through the Tŷ'r Afon Project are given a priority allocation due to the timeliness of managing move-on. Other rough sleepers who are not willing to access formal support services are recorded as being in high housing need and will wait for a suitable offer of social housing.

## Private Rented Sector

An alternative to social housing is to access private rented accommodation, especially where clients want to live in certain wards where there is limited social housing stock. Many landlords are now working with the Council to accept homeless people - staff within the Housing Options Service provide a team called Cardiff Housing Solutions to work with landlords. The service offers:

- A tenant finding and matching service and accompanied viewings.
- Property inspection, inventory and Health and Safety Rating System checks.
- Dedicated Account Management offering support, mediation and advice for landlord and tenant.
- Dedicated fast-tracked Housing Benefit service and direct payments.
- Provision of bonds.

In return, landlords are expected to provide quality properties at reasonable rent levels (Local Housing Allowance rates) and offer a minimum 6 month written tenancy agreement.



**We Will:** Ensure rough sleepers are given equitable access to private rented sector properties.

## Tenancy Support

In order for any settled accommodation to work, many rough sleepers will require an element of tenancy support to help them stabilise and maintain a home.

Tenancy support is currently provided during weekday hours which works well for the majority of people. However, in order to make the transition to accommodation successful, rough sleepers may initially require a more intensive service, which could include evening and weekend support.

**We Will:** Refocus housing-related support services to address the needs of former rough sleepers.

# Independent Living

## Maintaining Independence

### Individualised Budgets

Following a successful pilot scheme, the Council has maintained a small budget to work directly with hard to reach rough sleepers. In agreement with their caseworker, the scheme allows individual service users to make limited spends on items they believe will help bring about change. This could be a basic mobile phone to assist with maintaining contact and keeping appointments, through to furniture for accommodation once resettled.

The aim is to focus on the individual rather than simply repeating standard offers, provide a greater flexibility to reach out to those that are not engaging with services and to maximise the choices and control available to them. To make the use of this funding effective, it needs to support the activities identified within the agreed action plan of each individual.

***We Will:*** Fully integrate Individualised Budgets into the improved casework management approach.

### Reintegrating into Society

As with many homeless people, to make resettlement and independence truly successful, former rough sleepers need to have a reason to get up and be active each day. Many of the supported housing providers recognise this and deliver a range of diversionary activities which are also open to rough sleepers. Returning to hobbies and interests will ensure that homeless people can re-engage in society.

### **Case Study: Huggard Roots Project**

Service user EF first came to the Huggard Centre as a rough sleeper. He was reluctant to access services and was finding shelter nightly in town or camping out. EF expressed interest in working the land and learning to grow his own food.

He was referred to the Roots Project and started to volunteer building raised beds and learning how to use them. He became familiar with the Huggard emergency overnight stay and began to engage in the service. Months later EF is now living in Huggard shared accommodation following the stabilising experience and confidence built whilst volunteering at the centre.

### ***We Will:***

- Look at pathways into existing diversionary activities and develop additional activities as necessary.
- Explore ways of supporting rough sleepers with their transition into accommodation and eventual independence.

### Welfare Reform

Financial support provided through Housing Benefit or Universal Credit in the Private Rented Sector is restricted to the Local Housing Allowance (LHA) rate that is relevant to the household make-up and circumstances. A single claimant under the age of 35 with no dependant children will qualify for the shared accommodation rate. It has been announced that these LHA restrictions will now be implemented for social tenants with effect from April 2019 to align with the level of financial support provided in the Private Sector.

# Independent Living

Some groups of under 35 year olds will be exempt from the shared accommodation rate regardless of tenure. The exemptions that are most likely to apply to former rough sleepers are:

- Being in receipt of Middle or Higher Rate Disability Living Allowance Care;
- Being in receipt of Personal Independence Payment Daily Living;
- Being a former resident of a specialist hostel, who is aged over 25 and living in self contained accommodation;
- Certain prison leavers, aged over 25 and in self contained accommodation.

Those rough sleepers who are not exempt will face an additional barrier to achieving successful independent living.

**We Will:** Consider ways in which Discretionary Housing Payments may be used to assist rough sleepers who are not exempt from the shared accommodation rate.

## Accessing Work

Helping people to re-train and enter the job market is the best solution to welfare reform. The Council's Into Work Team provides help to those who are unemployed or looking to upskill from their current job. Daily job clubs run in many Community Hubs as well as outreach sessions from 12 locations across Cardiff.

The Team also offer work skills training such as manual handling; food safety; IT courses; confidence building and interview skills Those exiting rough sleeping can access this support, especially following successful

engagement with diversionary activities, or where ready to re-enter the job market.

**We Will:** Seek to engage the Council's Into Work Advisers to assist former rough sleepers as soon as possible following resettlement.

## **Case Study: Tony's Story**

"I became homeless when my wife died five years ago. I was getting into trouble as I could not cope and got locked up. I had to decide whether to make a change or stay stuck in this cycle. I then spent two years on the streets in Cardiff. I was offered hostel spaces but kept refusing as I did not want to end up in those circles where I would end up taking smack/crack. I kept refusing hostels until I was offered temporary accommodation, which I was in for about six months. Now I've been in my permanent flat for four and a half months.

I now volunteer with the charity Boomerang, helping the homeless with furniture and fittings when they get accommodated, putting something back after the help I received."



# Addressing Begging

The general public often does not distinguish between rough sleepers and people who are begging. Not all rough sleepers beg on the streets; many use established charitable options to seek food and supplies. Similarly not all those begging are rough sleepers; many use this as their regular income source and are suitably accommodated, whilst a small proportion are linked to organised crime.

Anecdotal evidence suggests that people can earn very significant sums of money from begging, especially during major sporting and other events in the city. Intelligence also demonstrates that the number of street beggars significantly increases on these occasions. The city centre in particular has a visible issue with street begging, however this is becoming more of an issue in community shopping areas. People have identified lucrative spots with high footfall, offering opportunities to receive donations from the general public. Tourists and those travelling to Cardiff for work are less likely to be aware of services available to assist people who are begging than those who are resident here.

Solutions are required that offer alternatives for those who wish to give money to people begging and presumed rough sleepers. Some local authorities in England have launched multi-agency publicity campaigns to raise awareness of the issues around giving directly to people who are begging. Posters and leaflets have been produced highlighting alternative or 'diverted giving' options such as donating to charities and recognised support services.



## Council Intervention

A snapshot taken by the Homeless Outreach Team on a rugby international event day identified 64 people begging. On a non-event day the snapshot revealed just 24 people begging. Only around half of these were current rough sleepers.

The Outreach Team work with partners such as the Huggard Day Centre to discourage rough sleepers away from begging and other anti-social behaviour. This includes assisting with welfare benefits, referring into accommodation and signposting to diversionary activities. As the majority of begging is linked to drug or alcohol issues, the team also encourage and support rough sleepers to attend specialist substance misuse services, as applicable.

## Police Intervention

All persistent begging will be subject to Police powers, such as those contained in Part 3 - 'Dispersal Powers' of the Anti-social Behaviour, Crime and Policing Act 2014. Where these fail, the Police can resort to applying a Criminal Behaviour Order as outlined in Part 2 of the same Act.

# Addressing Begging

South Wales Police carry out regular operations to address street begging, in particular the more aggressive behaviour that can occur. Emphasis is placed on supporting people to divert them away from this activity prior to any enforcement action being taken.

## **Operation Spruce**

Running over the 2016 festive period, Operation Spruce targeted anti-social behaviour in the city centre, including begging offences, pedlars and street drinking. This was a Police-led initiative, working with partners from the Council's Homeless Outreach Team; Park Rangers; Licensing and Enforcement Teams and Trading Standards. The operation involved a visible policing presence to:

- Respond swiftly to crime and disorder;
- Confiscate alcohol being consumed within Designated Public Place Orders;
- Make use of Anti-social Behaviour referrals for offenders;
- Make use of Section 35 dispersal notices for drink and begging-related anti-social behaviour;
- Arrest persons begging and consider Criminal Behaviour Orders;
- Increase public and retailer confidence that the neighbourhood policing team are tackling issues;
- Maintain a positive image of the city.

Consideration was given to any vulnerabilities highlighted through contact with people who were begging. Issues such as alcohol, drugs, mental health and homelessness were directed to the relevant



agency, to ensure full support was given to the individual.

The Council's Outreach Team continue to work in partnership with the Police to address street begging.

### ***We Will:***

- Provide clear options for members of the public wanting to support rough sleepers, other than giving to people who are begging, and raise awareness of services available.
- Identify clear alternatives to begging which all partners can refer into.
- Work with local Police to assist with taking appropriate action to prevent and reduce persistent begging in the city.
- Learn from the experience of other authorities and from the evaluation of Operation Spruce and consider other actions resulting from this.

# Summary of Commitments

## Research - *We Will*

Continue to benchmark with other local authorities to review and adopt relevant best practice.

Consider the findings of relevant research and pilot projects to inform future service provision.

## Identifying Rough Sleepers - *We Will:*

Improve the visibility of the Homeless Outreach Team's contact details on the Council website.

## Early Intervention Options - *We Will:*

Expand the Outreach Team to provide a case management approach to rough sleepers.

Improve data sharing between agencies involved with rough sleepers.

Work towards 'No First Night Out' for those who engage with services.

Strengthen the joint-working response, coordinating and refocusing all partners' efforts on getting people off the streets.

Develop procedures for closer partnership working with Faith groups.

Explore options to develop diversionary / befriending services.

Develop a support pathway through services for clients with mental health / substance misuse issues.

Review and improve partnership working between the statutory and voluntary sectors to address complex needs.

Build upon the success of the substance misuse pilot and explore further options for joint outreach with specialist partner agencies.

Develop a specialist pathway through services for females at high risk of exploitation.

Further develop the multi-agency procedures to identify and intervene with those who sleep rough on 3 separate occasions, or continuously sleep rough for 3 months.

Continue to monitor local connection for all clients.

Build on the success of, and ensure the sustainability of, the Reconnection Service.

Implement the Joint Working Protocol with Police and Immigration services.

Closely monitor the use of Public Space Protection Orders in force in England and Wales.

# Summary of Commitments

## Accommodation Options - *We Will:*

Review accommodation options for rough sleepers.

Gain a better understanding of the issues with emergency accommodation, to facilitate people coming off the streets.

Formalise arrangements for Council Outreach staff to undertake statutory homelessness assessments, giving clients access to services based on priority need.

Use the Single Persons Gateway to monitor usage of emergency provision to encourage move on and inform recommissioning.

Establish refined support pathways for rough sleepers.

Review all funding used to support homeless services to ensure sustainability and that outcomes are clearly understood and monitored.

Develop a support service specification to prepare for recommissioning homeless hostels.

Offer funding to pilot innovative new solutions to rough sleeping.

## Independent Living - *We Will:*

Further develop independent living solutions utilising the principles of Housing First and investigate the feasibility of adopting the full model.

Ensure rough sleepers are given equitable access to private rented sector properties.

Refocus housing-related support services to address the needs of former rough sleepers.

Fully integrate Individualised Budgets into the improved casework management approach.

Look at pathways into existing diversionary activities and develop additional activities as necessary.

Explore ways of supporting rough sleepers with their transition into accommodation and eventual independence.

Consider ways in which Discretionary Housing Payments may be used to assist rough sleepers who are not exempt from the shared accommodation rate.

Seek to engage the Council's Into Work Advisers to assist former rough sleepers as soon as possible following resettlement.

## Addressing Begging - *We Will:*

Provide clear options for members of the public wanting to support rough sleepers, other than giving to people who are begging, and raise awareness of services available.

Identify clear alternatives to begging which all partners can refer into.

Work with local Police to assist with taking appropriate action to prevent and reduce persistent begging in the city.

Learn from the experience of other authorities and from the evaluation of Operation Spruce and consider other actions resulting from this.



