



National Audit Office



Investigation into the housing of rough sleepers during the COVID-19 pandemic

Ministry of Housing, Communities & Local Government

REPORT

**by the Comptroller
and Auditor General**

**SESSION 2019–2021
14 JANUARY 2021
HC 1075**



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Investigation into the housing of rough sleepers during the COVID-19 pandemic

Ministry of Housing, Communities & Local Government

Report by the Comptroller and Auditor General

Ordered by the House of Commons
to be printed on 12 January 2021

This report has been prepared under Section 6 of the
National Audit Act 1983 for presentation to the House of
Commons in accordance with Section 9 of the Act

Gareth Davies
Comptroller and Auditor General
National Audit Office

11 January 2021

Investigations

We conduct investigations to establish the underlying facts in circumstances where concerns have been raised with us, or in response to intelligence that we have gathered through our wider work.

This investigation forms part of a programme of work to support Parliament in its scrutiny of the government's response to the COVID-19 pandemic. It establishes the facts of the initiative by which the Ministry of Housing, Communities & Local Government has sought to provide emergency housing for rough sleepers during the pandemic and sets out its longer-term plans for and beyond this emergency support.

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Key facts

33,139

people brought into accommodation (including emergency accommodation, such as hotels, and more settled accommodation, such as in the private rental sector) in response to the COVID-19 pandemic as at end of November 2020

16

recorded deaths of homeless people linked to COVID-19 as at 26 June 2020 (latest official figures)

£170m

amount local authorities expected to spend in 2020-21 on additional cost pressures related to rough sleeping, as at October 2020

4,266

official annual snapshot of people sleeping rough, as at autumn 2019 (published February 2020)

9,866

people remaining in hotels and other emergency accommodation, as at end of November 2020, having been taken in as rough sleepers or at risk of rough sleeping

23,273

people moved into more settled accommodation, as at end of November 2020 (this and the figure above sum to 33,139)

3,300

number of housing units to provide long-term accommodation for rough sleepers, to be delivered by 31 March 2021 under the £161 million Next Steps Accommodation Programme

What this investigation is about

1 On Thursday 26 March 2020, during the early stages of the COVID-19 pandemic, the government launched its ‘Everyone In’ campaign. Everyone In required local authorities to take urgent action to house rough sleepers and those at risk of rough sleeping in order to protect public health and stop wider transmission of COVID-19. Central government policy responsibility for tackling homelessness sits with the Ministry of Housing, Communities & Local Government (the Department), while the delivery of services to support homeless people sits with local authorities.

2 This investigation is part of a programme of work we are undertaking to support Parliament’s scrutiny of the government’s response to COVID-19. In this report we set out the steps taken by the Department in rehousing rough sleepers in England during the pandemic, focusing particularly on the steps taken at the outset of the pandemic; the information held by the Department on those at risk of rough sleeping; and subsequent steps that the Department has taken to provide long-term accommodation to those at risk of rough sleeping.

3 Our report primarily covers the period between March and November 2020. Fieldwork, conducted between September and November, included interviews with key staff from the Department. We also consulted a range of local authorities and voluntary sector organisations, as well as academics and other stakeholders with experience of delivering homeless services. Appendix One sets out our methodology in more detail.

4 This report is a ‘facts only’ account of the Department’s actions and is not a value-for-money evaluation. While we set out the spending by local authorities on rough sleeping in this report, we will cover the financial response of local authorities to COVID-19 as a whole in a value-for-money report due for publication later in 2021.

Summary

Key findings

Bringing 'Everyone In'

Putting the Everyone In campaign in place

5 By mid-March 2020, local authorities and the Ministry of Housing, Communities & Local Government (the Department) were moving swiftly in response to the threat COVID-19 posed to the health of rough sleepers. Rough sleepers typically experience poorer health than the rest of the population and are especially vulnerable to respiratory illnesses. Those at risk of rough sleeping may also occasionally sleep in communal shelters, where they cannot self-isolate if they have symptoms of COVID-19. With these factors in mind, by mid-March a number of local authorities were taking action to rehouse their vulnerable populations. To assist this, the Department announced initial funding of £3.2 million for local authorities to help rough sleepers to self-isolate, and distributed guidance on how to assess individual rough sleepers' needs effectively to contain the spread of the virus (paragraphs 1.3 to 1.6).

6 On 26 March the government launched its Everyone In campaign, asking local authorities to offer accommodation immediately to all rough sleepers and those at risk of being on the streets, due to the health risks posed by the pandemic. The Department was clear that local authorities should include those at risk of rough sleeping and people in accommodation where it was not possible to self-isolate, such as communal shelters. As such, in practice, Everyone In encompassed non-UK nationals who ordinarily are not legally entitled to receive public funding or support (paragraphs 1.7 to 1.9).

How Everyone In was delivered

7 Despite having no contingency plan in place, the Department swiftly reorganised to launch Everyone In. At the outset of this crisis the Department did not have a plan for protecting the rough sleeping population in the event of a pandemic. In early 2020, the Prime Minister appointed Dame Louise Casey (now Baroness Casey) to lead a review into rough sleeping. In mid-March her role changed, and she volunteered to step in to assist the pandemic response for rough sleepers. From mid-March onwards, the Department responded rapidly, reorganising its homelessness directorate to prioritise work on its response to the pandemic. The Department refocused the majority of its homelessness and rough sleeping advisers to work closely with local authorities to help them secure immediate accommodation for rough sleepers (paragraphs 1.10 to 1.11).

8 The Department took a ‘hands on’ approach, working intensively with local authorities, homelessness charities and hotel chains. This meant that the Department, working with local authorities, was able to pinpoint locations where rough sleepers were gathering, and move them into accommodation. At the outset of the pandemic, in March, local authorities estimated that there was a total of 6,000 rough sleepers in England; by mid-April, 5,400 people (90% of this total) had been made an offer of emergency accommodation. The scale and pace of the urgent effort to take rough sleepers, and those at risk of rough sleeping, into safe accommodation tested the resilience of all organisations involved, with key staff working intensively for extended periods (paragraphs 1.11 and 1.12).

9 Local authorities expect to spend around £170 million rehousing rough sleepers in response to the pandemic in 2020-21, paid for by a combination of emergency grants, existing homelessness funding streams, and their own internal resources. Between April and September 2020, local authorities reported that they had spent £100 million on rough sleeping, and as at October 2020 were forecasting spending of around £170 million on rough sleepers overall in 2020-21. The Department did not provide designated funding for Everyone In but has distributed £4.6 billion in funding to local authorities since March to cover all additional spending related to COVID-19. The Department has also allowed local authorities to repurpose £8.2 million from its longstanding Rough Sleeping Initiative to rehousing rough sleepers during the pandemic (paragraphs 1.13 to 1.14).

What Everyone In has achieved

10 By the end of November 2020 more than 33,000 people had been helped to find accommodation under Everyone In. The Department has a goal of ending rough sleeping by 2024. While Everyone In was not designed to contribute to achieving this goal, it has enabled valuable work to be undertaken towards it. At the end of November, a total of 23,273 people (a number of whom had first been taken into emergency accommodation) had been supported to move into settled accommodation (such as social housing or the private rental sector) or a ‘rough sleeping pathway’ (including hostels and supported housing, or moving in with family or friends). Meanwhile, a further 9,866 people remained in hotels and other emergency accommodation, having also previously been taken in off the streets or after presenting to a local authority as being at risk of sleeping rough (paragraphs 1.17 and 1.18).

11 COVID-19 infections and deaths have been relatively low among the homeless and rough sleeping population in England. Up to June (the latest date for which Office for National Statistics data are available), the deaths of 16 homeless people had been identified as involving COVID-19. An academic study also estimates that, by taking preventative measures such as closing night shelters, Everyone In may have avoided more than 20,000 infections and 266 deaths among the homeless population. Early evidence suggests that transmission rates for this group in England have been significantly lower than, for example, cities in the United States that rely heavily on communal night shelters (paragraphs 1.15 and 1.16).

Government approach since May 2020

12 The number of people accommodated under Everyone In over several months far exceeds the number officially recorded as rough sleeping in the annual national snapshot. In November 2019 the government's annual headcount of the number of rough sleepers estimated that there were 4,266 people sleeping rough on a single night. In the early stages of Everyone In, local authorities took in a higher volume of people, presenting as being in need of emergency accommodation, than were reported as sleeping rough in their area in the most recent snapshot. By the end of November 2020 the number of people helped under Everyone In was more than 33,000 (paragraphs 2.1 to 2.4).

13 In May the Department announced that it was moving to the next phase of the government's support for rough sleepers during the pandemic. On 28 May the Department wrote to local authorities, asking them to submit plans for supporting people to move on from emergency accommodation. Following this letter, the approach taken by local authorities to those who newly presented as rough sleeping increasingly diverged, with some continuing to take people into emergency accommodation regardless of eligibility, and others assessing people's eligibility for support (paragraphs 2.6 and 2.7).

14 There was a continued flow of rough sleepers onto the streets over the summer and autumn. Local authorities and charities we spoke to reported that they have seen increased numbers of people sleeping rough since June. Data collected by the Department from local authorities since the early stages of Everyone In appear to confirm the upward trend in numbers, although the data are still to be fully verified. The data are not yet available in the public domain and the Department is currently considering options for the publication of these data (paragraphs 2.8 and 2.9).

15 People with no recourse to public funds housed under Everyone In face challenges in moving to more settled accommodation. At the outset of Everyone In, the Department encouraged local authorities to take all those sleeping rough into emergency accommodation, irrespective of nationality or entitlement to benefits. In its ministerial letter of 28 May the Department reminded local authorities that legal restrictions on offering support to people ineligible for benefits remained in force, and that exceptions should only be made after an individual assessment of there being a risk to life. Some local authorities stopped taking those who were ineligible for benefits into emergency accommodation and sought to move on those already in such accommodation. Moving people who have no recourse to public funds into settled accommodation has proved challenging because they cannot claim benefits and might struggle financially to move into the private rental sector. This was a particular issue in London where, by the end of September, around 2,000 people (or around half of the 4,000 in total) who remained in hotels and other emergency accommodation were ineligible for benefits (paragraphs 2.10 to 2.13).

16 For the winter of 2020, Everyone In will form one of a range of measures targeted on areas with large numbers of rough sleepers. On 5 November, the Department set out the approach to rough sleepers that it will take during the winter of 2020-21. At the centre of this is the Protect Programme, a newly established initiative which provides funding of £15 million in addition to that already spent by local authorities on rehousing rough sleepers, and is geared towards those with high numbers of rough sleepers. Everyone In will continue to run alongside this. In addition, while underlining that night shelters should only be a last resort due to the risks of COVID-19 transmission, the Department announced £12 million of funding to provide self-contained emergency accommodation and help make night shelters safer for use. In January 2021, the Department announced £10 million of additional funding for local authorities to help them accommodate people still sleeping rough, and to help them to register with a GP to get a COVID-19 vaccination (paragraphs 2.14 to 2.18).

17 In response to the pandemic, the Department brought forward planned funding to accelerate securing 3,300 homes for rough sleepers by 31 March 2021. In May, the Department announced that it would make a further £161 million available for local authorities to deliver 3,300 new housing units for rough sleepers by the end of the 2020-21 financial year. Assessing local authorities' bids for long-term accommodation funding proved to be more complex than the Department anticipated, which delayed the funding announcement. The Department announced on 29 October that more than £150 million had been allocated to 276 local authority schemes for new homes for rough sleepers. The Department remains confident that local authorities will be able to deliver 3,300 units by the end of March 2021, as the majority of these are set to be delivered through the lease or purchase of existing buildings, with many projects already initiated in anticipation of government funding (paragraphs 2.19 and 2.20).

18 In early 2020 the Department had identified a need to review its Rough Sleeping Strategy, but this has not yet been carried out. The current published strategy is out of date: it refers to the previous government's target of ending rough sleeping by 2027. The current government was elected in December 2019 with a manifesto commitment to bring forward this target to May 2024. The review into rough sleeping which Baroness Casey was brought in to conduct in February 2020 has yet to take place, due to the focus on COVID-19 (paragraph 2.21).

Concluding remarks

19 Everyone In should be regarded as a considerable achievement. The rehousing of rough sleepers in the early stages of COVID-19 demonstrates what can be done when central government, local authorities and voluntary organisations work together to respond to an extremely urgent priority. Everyone In has helped keep rates of infection and deaths low among rough sleepers and those at risk of rough sleeping – a highly vulnerable population. Moreover, although it is not part of the government's plan to end rough sleeping by 2024, Everyone In has enabled valuable work to be conducted towards this goal, with more than 33,000 people helped so far. The achievement of Everyone In is made more impressive by the fact that the Department did not have a contingency plan in place for working with rough sleepers at the outset of the pandemic.

20 Nevertheless, Everyone In has also raised key issues that the government needs to address in the immediate future:

- a** Everyone In has for the first time provided data on the potential scale of the population in England which either sleeps rough or is at risk of doing so. The Department needs to build upon this knowledge to understand fully the size and needs of this population and communicate this to local authorities.
- b** Everyone In has resulted in a large number of people remaining in emergency accommodation and not being able to move on from it because they have no recourse to public funds. The government needs to establish what action it will take with this population.
- c** The response to the resurgence of COVID-19 does not appear as comprehensive as the initial Everyone In in the spring. The Department will need to keep under close review whether its more targeted approach will protect vulnerable individuals as decisively as the approach it took in the early stages of the pandemic.
- d** It is clear that there is significant learning available from the experience of Everyone In for the Department and all partners involved. The Department should use this knowledge towards its goal of ending rough sleeping by the end of this Parliament, when it returns to its review of rough sleeping. Also, as the Department revisits its rough sleeping strategy, and to support its new objective for this, it should seek to align the initiatives and funding streams announced during COVID-19 into a cohesive plan.

Part One

Bringing ‘Everyone In’

Background

1.1 The Ministry of Housing, Communities & Local Government (the Department) defines rough sleepers as “people sleeping, about to bed down, or actually bedded down in the open air, and people in buildings or other places not designed for habitation”.¹ Responsibility in central government in England for addressing homelessness sits with the Department, which has objectives for ending rough sleeping by 2024, and helping those either at risk of or experiencing homelessness. Under English law, local authorities have a statutory duty to provide support services to those experiencing or at risk of homelessness.

1.2 This definition does not include those housed temporarily in shelters or hostels. Many ‘hidden homeless’ – without permanent homes of their own – are at risk of sleeping rough.² The government records a snapshot estimate of rough sleepers once a year; according to the most recent published figures, there were an estimated 4,266 people sleeping rough on one night in autumn 2019, with nearly half of these in London and the South East (**Figure 1** overleaf and **Figure 2** on page 13). The government has committed to ending rough sleeping by May 2024.³

1.3 Rough sleepers suffer from poorer health than the general population, often experiencing a combination of mental health, substance abuse and physical health needs. Rough sleepers also often do not have access to healthcare services, and often report that without a fixed address they are unable to register with a GP.

1 Ministry of Housing, Communities & Local Government, *Guidance: Homelessness data: notes and definitions*, 3 April 2018.

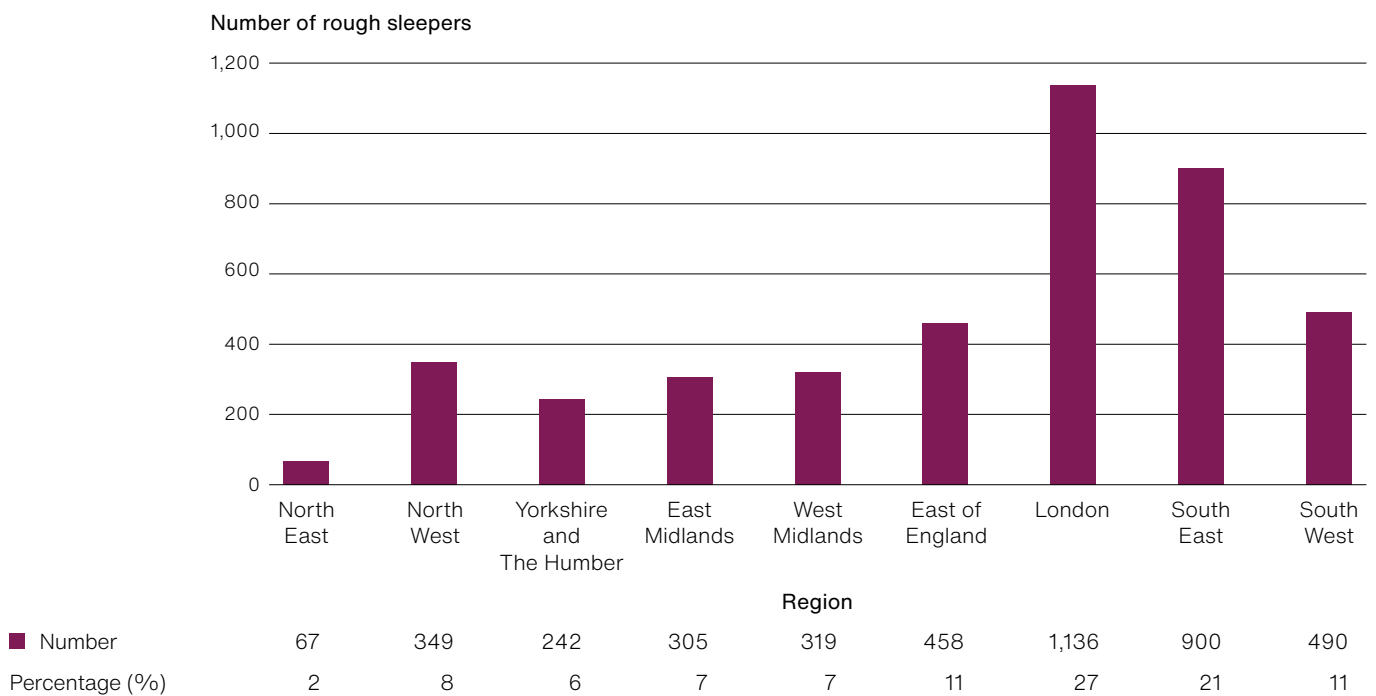
2 For definitions of different forms of homelessness see Crisis, *The Homeless Monitor: England 2019*, May 2019, pp. xiv to xix.

3 Ministry of Housing, Communities & Local Government, ‘*Prime Minister pledges new action to eliminate homelessness and rough sleeping*’, press release, 23 December 2019.

Figure 1

Numbers of rough sleepers by region in England, autumn 2019

Nearly half of the estimated 4,266 people sleeping rough on one night in autumn 2019 were recorded in London or the South East



Notes

- 1 Rough sleepers are defined as those sleeping or about to bed down in open air locations and other places including tents and makeshift shelters.
- 2 Rough sleeper figures are collected via annual snapshots that take place on a single date chosen by each local authority between 1 October and 30 November. They can be carried out using either a count-based estimate, an evidence-based estimate meeting with local partners or an evidence-based estimate with spotlight count. The snapshots do not include people in hostels or shelters, sofa surfers or those in recreational or organised protest, squatter or traveller campsites. Figures are collated by outreach workers, local charities and community groups and do not include everyone in an area with a history of sleeping rough, or everyone sleeping rough between October and November. The snapshot process and figures are independently verified by Homeless Link (the national membership charity for organisations working directly with people who become homeless in England).

Source: Ministry of Housing, Communities & Local Government, *Rough sleeping snapshot in England: autumn 2019*

Figure 2

Local authorities with the largest rough sleeper estimates, autumn 2019

Thirteen of the twenty largest local authority estimates were in London or the South East

Local authority	Region	Rough sleepers
Westminster	London	333
Hillingdon	London	106
Bristol, City of	South West	98
Manchester	North West	91
Brighton and Hove	South East	88
Bournemouth, Christchurch and Poole	South West	72
Camden	London	65
Newham	London	64
Birmingham	West Midlands	52
Islington	London	51
Southwark	London	44
Luton	East of England	43
Oxford	South East	43
Lambeth	London	43
City of London	London	41
Windsor and Maidenhead	South East	40
Leeds	Yorkshire and The Humber	40
Canterbury	South East	39
Peterborough	East of England	37
Buckinghamshire	South East	36

Notes

- 1 Rough sleepers are defined as those sleeping or about to bed down in open air locations and other places including tents and makeshift shelters.
- 2 Rough sleeper figures are collected via annual snapshots that take place on a single date chosen by each local authority between 1st October and 30th November. They can be carried out using either a count-based estimate, an evidence-based estimate meeting with local partners or an evidence-based estimate with spotlight count. The snapshots do not include people in hostels or shelters, sofa surfers or those in recreational or organised protest, squatter or traveller campsites. Figures are collated by outreach workers, local charities and community groups and do not include everyone in an area with a history of sleeping rough, or everyone sleeping rough between October and November. The snapshot process and figures are independently verified by Homeless Link (the national membership charity for organisations working directly with people who become homeless in England).
- 3 Buckinghamshire County Council was created in April 2020. To maintain comparability with data collected during the Coronavirus pandemic, the figure provided above has been created by aggregating those submitted by the former Aylesbury Vale, Chiltern, South Bucks and Wycombe district councils.
- 4 According to latest published figures, 4,266 people were estimated to be sleeping rough on one night in autumn 2019.

Source: Ministry of Housing, Communities & Local Government, *Rough sleeping snapshot in England: autumn 2019*

1.4 The potential impact of COVID-19 on rough sleepers was, by March 2020, greatly concerning local authorities and homelessness charities. The poorer health of rough sleepers, combined with their adverse living conditions, means that they are particularly susceptible to respiratory illnesses and were considered vulnerable to serious illness from contracting COVID-19.⁴ Also, as many rough sleepers at this point spent time in communal shelters, they would have been unable to self-isolate if they developed symptoms of COVID-19 and would also have been at risk of transmitting the virus to others.

Putting the Everyone In initiative in place

1.5 In recognition of the potential threat that COVID-19 posed to rough sleepers, by mid-March a number of local authorities and voluntary organisations had begun to provide emergency accommodation to their rough sleeping populations. For example, on 19 March the Greater London Authority (GLA) began procuring hotel rooms for this purpose.

1.6 On 16 March, the government announced that anyone with COVID-19 symptoms should self-isolate for two weeks (**Figure 3** on page 16 and 17). Recognising the difficulties this caused rough sleepers, on 17 March the Department provided £3.2 million of emergency funding to all local authorities in England to help rough sleepers to self-isolate. This funding was intended to reimburse local authorities for the cost of providing emergency accommodation and services for rough sleepers, and those at risk of rough sleeping, including those in communal shelters or using communal day centres to access support. The Department stated that this funding was an initial step in helping local authorities prepare fully for the pandemic. Its allocation was based on the number of rough sleepers reported in the autumn 2019 snapshot. Also, in mid-March, Public Health England released guidance for providers of hostels and day centres on dealing with the impact of the virus.

1.7 The need to take action became more urgent when, on 23 March, the government announced a national lockdown with immediate effect. On 26 March the Department launched the Everyone In campaign by writing to local authority chief executives in England, asking them to urgently accommodate all rough sleepers in emergency accommodation “by the end of the week” in order to protect health and prevent wider transmission.

4 D Lewer et al., ‘COVID-19 among people experiencing homelessness in England: a modelling study’, *The Lancet Respiratory Medicine*, vol. 8 issue 12, December 2020, pp. 1181-91.

1.8 Due to the magnitude of the public health threat posed by COVID-19, the Department instructed local authorities to offer accommodation to everyone sleeping rough or at risk of being on the streets, and those in communal shelters and other accommodation where it was not possible to self-isolate. This included those who would not normally be covered by homelessness legislation. Among those who presented to local authorities as being at risk of rough sleeping were people who had been ‘sofa surfing’ with friends and family, or in other forms of unofficial housing arrangements. In practice, Everyone In encompassed categories of non-UK nationals who ordinarily are not legally entitled to receive public support. In parallel, the government announced a ban on evictions from the private-rented sector, to reduce the numbers being made newly homeless.

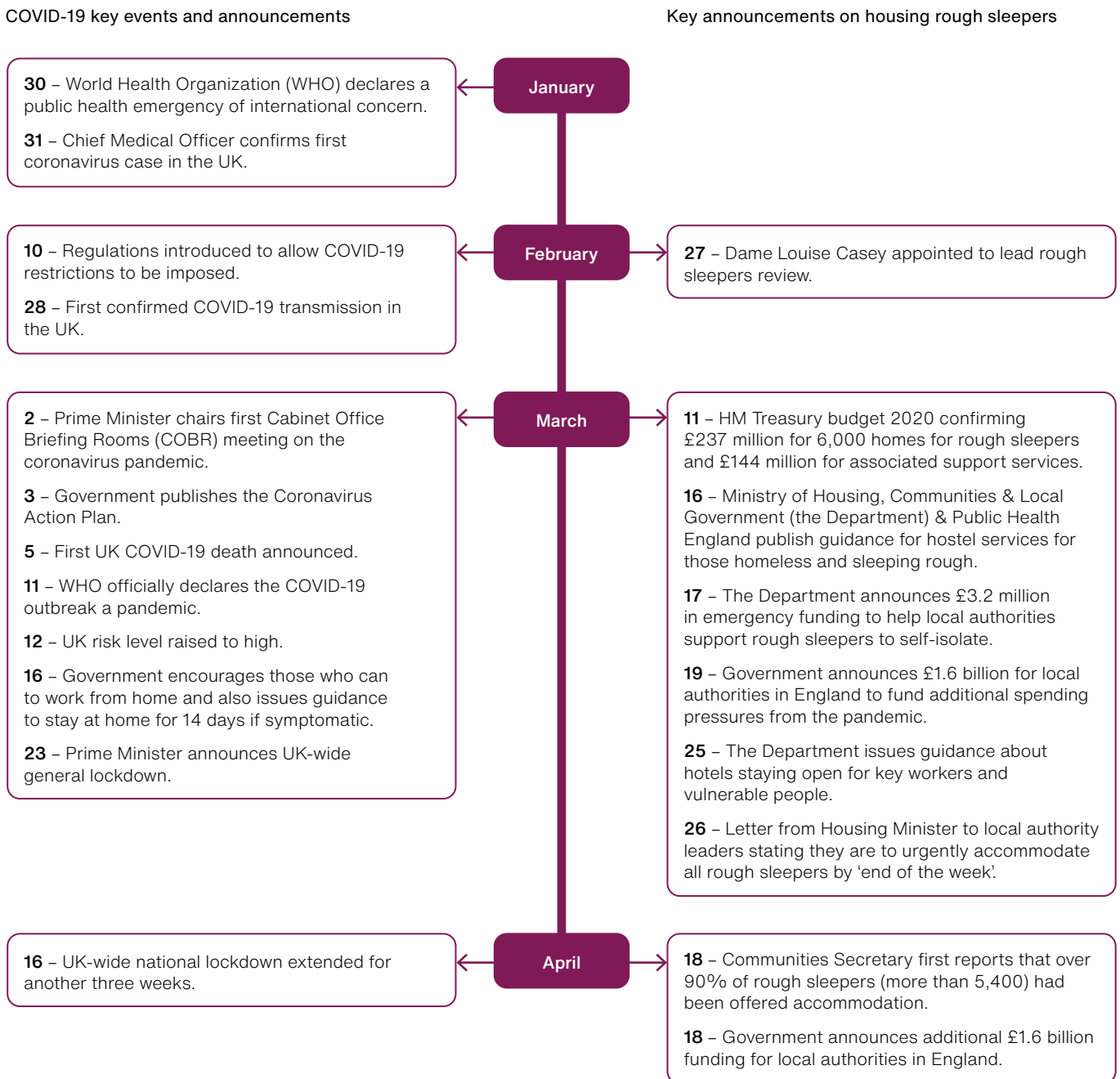
1.9 Local authorities, in partnership with the voluntary sector, responded immediately to Everyone In, building upon work that in many cases had already begun. Local authorities worked closely with the voluntary sector and providers of homelessness support services to identify vulnerable individuals and make them an offer of emergency accommodation. Charities and local authorities used a triage system to offer individuals the most appropriate accommodation. This distinguished between those with COVID-19 symptoms, those with pre-existing health conditions (but no symptoms) who would be more at risk from the virus, and those without either of the above but who needed somewhere to stay away from the streets without the use of shared facilities. The accommodation needed to be self-contained, and many rough sleepers were taken into hotels, closed to the public under lockdown restrictions, with rooms procured and block-booked by local authorities. The GLA sought to pay no more than between £25 and £35 per night in its block booking of hotels, and shared this information on room prices with the Department and London boroughs. This information on hotel prices was also passed on by departmental officials to other local authorities to help them towards negotiating similar deals, although this was not always possible. When hotels began to close in response to the national lockdown, the Department urged hotel chains to remain open for this purpose and ensured that staff from charities supporting rough sleepers in hotels were classified as key workers.⁵

5 Ministry of Housing, Communities & Local Government, Letter from Minister Hall to hotels on *Providing accommodation to support key workers and vulnerable people*, 24 March 2020.

Figure 3

Timeline of key events during the COVID pandemic, and announcements on housing rough sleepers during the pandemic

There were a number of key announcements on housing rough sleepers between January and October 2020



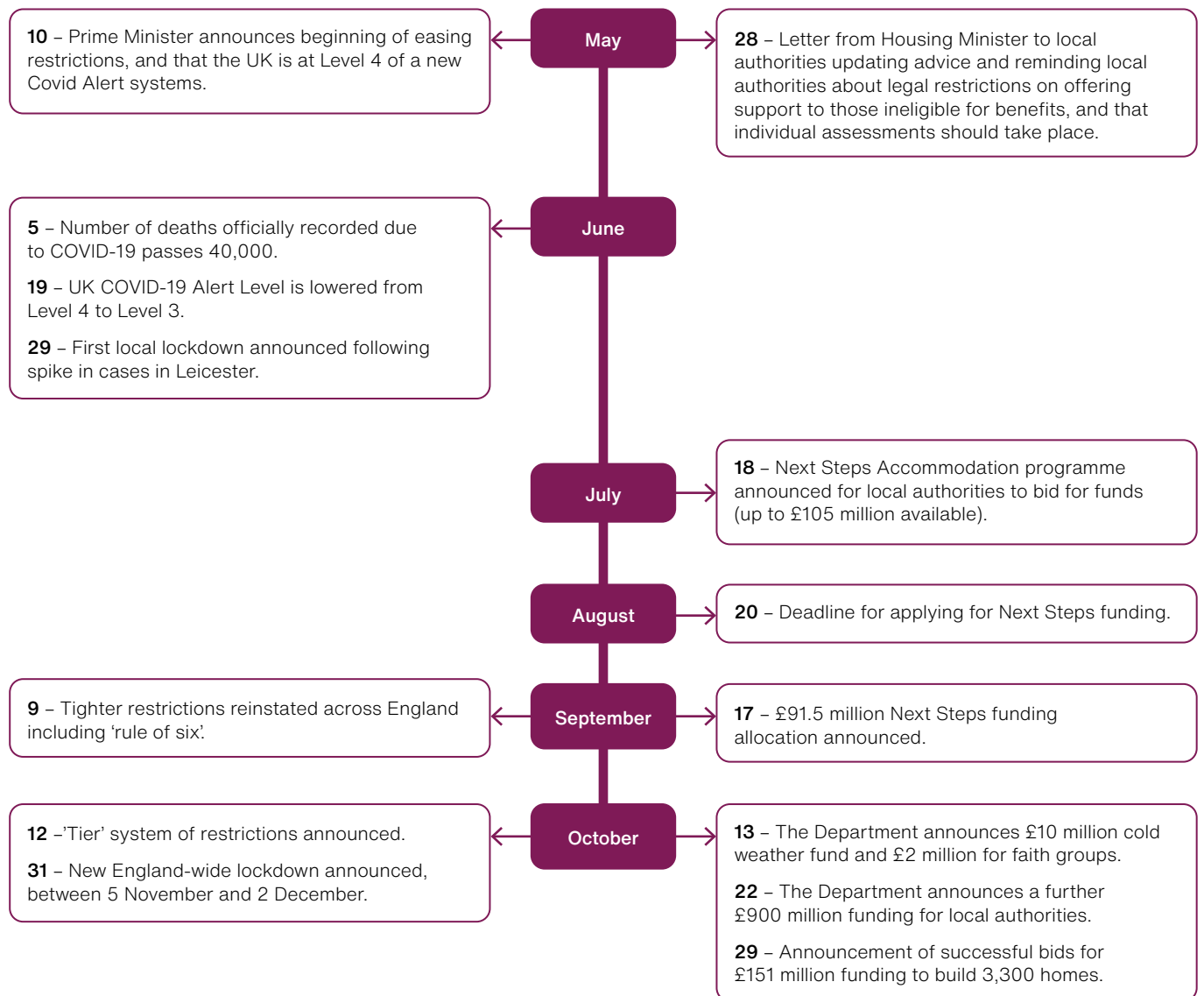
Note

1 This diagram does not include all of the Department's announcements on COVID-19.

Source: National Audit Office analysis of the Department's announcements

COVID-19 key events and announcements

Key announcements on housing rough sleepers



How Everyone In was delivered

1.10 The Department did not have an existing plan for how to protect rough sleepers at the outset of COVID-19, as this had not formed part of government's national pandemic planning. The unprecedented scale and speed of Everyone In required the Department to adopt new ways of working. In early 2020, the Prime Minister had appointed Dame Louise (now Baroness) Casey to conduct a review into how to work effectively with rough sleepers. In March she volunteered to assist the Department's pandemic response in respect of people who were sleeping rough. Her role rapidly developed so that she took leadership of a semi-formalised administrative structure (subsequently named the Rough Sleeping Taskforce) responsible for delivering the Department's rehousing of rough sleepers. In this capacity she reported directly to ministers. Having taken on this role, Baroness Casey also wrote to all local authorities, setting out the urgent requirement to take all rough sleepers and those at risk of rough sleeping into accommodation. Within the taskforce, departmental staff were reallocated and administrative structures (comprising approximately 45 staff) reorganised with the rehousing of rough sleepers made the central priority. Many stakeholders we interviewed considered Baroness Casey's experience, leadership and drive to have been key to driving forward Everyone In at considerable pace in its early stages.

1.11 At a local level, advisers employed by the Department to work with local authorities in tackling homelessness changed focus from an advisory role to one in which they worked closely with local authorities and the voluntary sector to secure emergency accommodation quickly for all those rough sleepers and vulnerable people who needed it. This included negotiating directly with hotel chains to secure rooms. Close working with the voluntary sector was particularly important as charities often had detailed knowledge of the most vulnerable rough sleepers. In some areas the Department worked with local authorities and charities to identify 'hotspots' where rough sleepers were still gathering despite the restrictions in place, and to persuade them to move into accommodation to protect their health.

1.12 In March, local authorities estimated that there were 6,000 rough sleepers in England (a higher figure than the official annual snapshot count of 4,266).⁶ By mid-April, 5,400 people – 90% of the 6,000 identified a few weeks previously by the Department – had received an offer of safe accommodation, although as we set out later in this report numbers of rough sleepers continued to increase throughout the pandemic. The efforts involved tested the resilience of all the organisations involved; in speaking to the Department, local authorities and charities we repeatedly heard accounts of people working seven days a week for a period of several weeks.

⁶ The estimated figures for March 2020 are not directly comparable with the annual snapshot figures, as the methodology used to generate them is less robust and they are not subject to independent verification. In addition, these estimated figures include people who had been sleeping in communal shelters, who are not included in annual snapshots.

How Everyone In was funded

1.13 The Department expects much of the cost of Everyone In to be covered by wider funding made available to local authorities to help them cope with the financial pressures arising from their response to the pandemic. As of December 2020, the Department had distributed £4.6 billion to local authorities in four separate tranches. This funding is un-ringfenced, meaning that local authorities make their own decisions on its use. Between April and September 2020 local authorities reported to the Department that they had spent £100 million on additional rough sleeping services related to COVID-19. As at October local authorities' forecast spending on rough sleeping for the financial year 2020-21 was £170 million, although they expect to recover around £33 million through housing benefit, Universal Credit and tenant contributions.

1.14 In addition to the share of the COVID-19 response funding they allocated to rough sleeping, and their own internal resources, at the outset of the pandemic local authorities had a number of existing funding streams targeted at reducing homelessness and tackling rough sleeping available to them, with £375 million allocated for 2020-21 (not including funding for longer-term accommodation units, discussed in paragraphs 2.19 and 2.20) (**Figure 4**). Local authorities were able to draw on this funding in addition to emergency grants if they needed to make up a funding shortfall. For example, the Department had planned for local authorities to spend around £112 million on its long-standing Rough Sleeping Initiative in 2020-21. Local authorities have been permitted to use £8.2 million of this funding for their emergency response.

Figure 4

Key funding streams available to local authorities for homelessness in 2020-21

Local authorities had £375 million available in existing homeless funding in 2020-21

Date announced	Amount allocated for 2020-21 (£m)	Details of funding stream
23 December 2019	200	Flexible Homelessness Grant, across 300 local authorities
23 December 2019	63	Homelessness Reduction Grant, across 300 local authorities
28 January 2020	112	Third year of the Rough Sleeping Initiative

Note

1 This figure presents funding announcements made between December 2019 and January 2020 only. Additional announcements were made after May 2020 which are detailed in Part Two of this report.

Source: National Audit Office analysis of Ministry of Housing, Communities & Local Government announcements

What Everyone In achieved

1.15 The Department regards Everyone In primarily as a public health response aimed at reducing the risk to a vulnerable population, and at preventing wider transmission. Early reports suggest that transmission of COVID-19 among rough sleepers has been significantly lower than in the United States, where communal settings such as night shelters were used to a much greater extent to provide emergency accommodation for those sleeping rough.⁷

1.16 There have been relatively few fatalities among homeless people linked to COVID-19. As at 26 June 2020, of people whose deaths were registered as involving COVID-19, 16 were identified as having been homeless, according to Office for National Statistics data.⁸ A recent academic study estimated that there have been around 24 deaths among rough sleepers due to COVID-19 in England. The same study also estimates that, by closing night shelters and taking other actions to reduce transmission, Everyone In may have helped to prevent more than 20,000 infections and 266 deaths among the homeless population over this period.⁹

1.17 Although not specifically part of the Department's longer-term plan to meet its aim of ending rough sleeping by May 2024, Everyone In has enabled valuable work to take place towards this objective. Local authorities and the voluntary sector have been able to work with those taken into emergency accommodation and have helped support them with health and other needs, to access financial support and employment opportunities, and crucially to move many into more permanent accommodation. Around 5,400 of those sleeping rough, or at risk of sleeping rough, at the start of the national lockdown had been taken into emergency accommodation by mid-April.

⁷ A Story and A Hayward, *Public Health rationale for NOT opening/re-opening communal airspace sleeping facilities for homeless people during the SARS-CoV-2 pandemic*, UCL Collaborative Centre for Inclusion Health, August 2020.

⁸ Office for National Statistics, *Coronavirus and deaths of homeless people, England and Wales: deaths registered up to 26 June 2020*, 10 July 2020. Deceased individuals were identified as having been homeless where the death registration described their place of residence as "of no fixed abode", a night shelter, or a hotel or other emergency accommodation known to have been used to accommodate rough sleepers under Everyone In.

⁹ D Lewer *et al.*, 'COVID-19 among people experiencing homelessness in England: a modelling study', *The Lancet Respiratory Medicine*, vol. 8 issue 12, December 2020, pp. 1181-91.

1.18 Once in emergency accommodation, there are a number of options to help those with no permanent home into more stable accommodation. For example, local authorities have been able to work with people eligible to benefits to support moves into social housing or private rented accommodation. Local authorities have also been able to work with rough sleepers with particular long-term conditions to help them move into supported housing, where they receive assistance to live independently. A further group has been helped to return to their family homes or other previous living arrangements. At the end of November, a total of 23,273 people had been supported to move on from emergency accommodation into settled accommodation (such as social housing or the private rental sector) or a 'rough sleeping pathway' (including hostels and supported housing, or moving in with family or friends).¹⁰ This is an increase of more than 4,000 from 18,911 at the end of September.¹¹ A further 9,866 people remained in hotels or other emergency accommodation as at the end of November.¹²

10 Ministry of Housing, Communities & Local Government, Coronavirus (COVID-19) emergency accommodation survey data: November 2020, 8 January 2021.

11 Ministry of Housing, Communities & Local Government, Coronavirus (COVID-19) emergency accommodation survey data: September 2020, 13 October 2020.

12 See footnote 10.

Part Two

Everyone In: developments from May 2020 onwards

Scale and measurement of rough sleeping

2.1 The total number of people accommodated under Everyone In between the end of March and the end of November 2020 – 33,139 – was almost eight times greater than the most recent annual snapshot of rough sleepers, collated by the Ministry of Housing, Communities & Local Government (the Department), which estimated that a total of 4,266 people slept rough on one night in autumn 2019.¹³

2.2 The Department regards its annual snapshot statistics as a valuable measure for tracking changes in the rough sleeping population year on year. It is, however, aware that the total number of people sleeping rough, or at risk of sleeping rough over a longer period of time, is much higher than the snapshot can show. The snapshot only aims to capture the picture of who is sleeping rough on one particular night, whereas over a longer period of time there will be a churn of people moving onto and off the streets. The Office for Statistics Regulation (OSR) has previously recognised that the accurate estimation of rough sleeping is challenging, and that while the Department's snapshot methodology was limited, it represented the most comprehensive approach available in England at the time.¹⁴ More recently, in a review it carried out on the Department's 2019 snapshot figures, the OSR found a range of positive features that demonstrated the quality and value of these statistics. However, the OSR also identified some areas for improvement, including drawing on a wider range of published statistics and unpublished management information to produce new insights on the lived experience of sleeping rough; engaging with a broader range of users on how these statistics might be further improved; and establishing a new process for the timely publication of management information drawn on by the government in public statements on rough sleeping.¹⁵ Going forward, the OSR has stressed the need to develop comprehensive and timely official statistics on the circumstances of rough sleepers since the start of the pandemic. The OSR believes the official snapshot should be combined with other robust and insightful evidence to more fully convey the dynamics and complexity of rough sleeping in England. Among other things, this should enable a better understanding of how people move in and out of rough sleeping over time.¹⁶

¹³ Ministry of Housing, Communities & Local Government, Coronavirus (COVID-19) emergency accommodation survey data: November 2020, 8 January 2021.

¹⁴ Office for Statistics Regulation, *Rough Sleeping Initiative evaluation*, 4 October 2019.

¹⁵ Office for Statistics Regulation, *Mark Pont to Sandra Tudor: Compliance Check of Rough sleeping snapshot in England*, 3 July 2020.

¹⁶ Office for Statistics Regulation, *Understanding rough sleeping during a pandemic*, 23 October 2020.

2.3 In addition, the snapshot is not designed to include people in night shelters or assessment centres (many of whose residents were taken in under Everyone In) and may also miss people sleeping in places which are hidden from view. As an illustration of the difference this could make to the figures, in May local authorities reported that they had taken 2,000 people into emergency accommodation from communal night shelters.¹⁷ While these figures were not independently verified, and refer to spring 2020 rather than autumn 2019 when the last snapshot was taken, they illustrate the existence of a cohort of people, sleeping in communal shelters, who are not represented in the official snapshots of rough sleeping.

2.4 Local authorities reported a higher volume of people presenting as being in need of emergency accommodation in the early stages of Everyone In than had been recorded in their most recent snapshots. Bristol City Council, for example, reported that it accommodated 400 people in March, when its most recent annual snapshot count was 98 rough sleepers. Bristol understands these higher numbers to be a result, in part, of its decision on public health grounds to close all communal night shelters and to provide housing for those who had been sleeping in them. Additionally, it provided accommodation for people who could not self-isolate or were on the cusp of rough sleeping. As another example, the London Borough of Southwark informed us that in March 2020 it had 25 known rough sleepers, down from 91 in the summer of 2019, but within hours of beginning Everyone In it had taken 200 people into hotels. By November Southwark had accommodated nearly 1,000 people in total; it believes a significant number of these were rough sleepers who had moved to the borough over this period from other areas.

2.5 The Department estimates that a proportion of those who presented to local authorities were not imminently at risk of rough sleeping. It has not sought to quantify how many people this might be. The Department has also noted that the approach taken by local authorities varied even at an early stage in the initiative, with some conducting assessments verifying people's status as rough sleepers before accommodating them, and others taking an 'open door' approach. The Department states that it would have been good practice for local authorities to assess the housing needs of each individual who presented as rough sleeping before deciding whether to take them into a hotel, although it did not include any specific guidance on this in its 26 March instruction to local authorities to take "Everyone In."

¹⁷ Ministry of Housing, Communities & Local Government, *Coronavirus (COVID-19) emergency accommodation survey data: May 2020*, 3 June 2020.

Moving to the next phase of Everyone In

2.6 On 2 May the Department announced that it was working on the next phase of its support for rough sleepers during the pandemic, in which it would work with local authorities to move people from hotels into long-term accommodation once the immediate crisis was over.¹⁸ On 28 May it wrote to local authorities, asking them to produce a next steps plan for moving each of the rough sleepers they had accommodated under Everyone In into long-term accommodation. It informed local authorities that, where appropriate, they could begin moving people out of hotels straight away.¹⁹ Numbers accommodated in hotels and other emergency accommodation stood at 14,610 in mid-May. From this point, they continued to rise into early summer, before declining gradually to 9,866 at the end of November.

2.7 In announcing this move to a next phase of support, the Department did not formally announce the end of Everyone In, or explicitly suggest that local authorities should stop taking in people who newly presented as rough sleeping. Through its rough sleeping and homelessness advisory teams, however, it began in May to advise local authorities to ensure that they were making assessments of individuals' needs before deciding to take them in, although the Department understands that many local authorities were already taking this approach by this point. Some local authorities have reported that after May there was increased inconsistency among local authorities in how many new rough sleepers they were prepared to take in, particularly regarding non-UK nationals with no recourse to public funds (see paragraphs 2.10 to 2.13). While the majority of local authorities reduced numbers in hotels and emergency accommodation between June and September, a small number increased their use of this accommodation over this period.

Ongoing presence of rough sleepers on the streets

2.8 Despite its significant impact, the Everyone In campaign has not ended rough sleeping. Local authorities and charities we spoke to told us that there was a continued flow of rough sleepers onto the streets, and that numbers continued to rise over the summer and autumn. Those still sleeping rough after the first weeks of the Everyone In campaign fall into three main groups, those who:

- a** have refused an offer to be taken into hotels;
- b** accepted an offer, but subsequently abandoned or were evicted from the hotels they had been placed in; and
- c** new rough sleepers who have not been offered accommodation.

¹⁸ Ministry of Housing, Communities & Local Government, *Dame Louise Casey to spearhead government taskforce on rough sleeping during pandemic*, press release, 2 May 2020.

¹⁹ Ministry of Housing, Communities & Local Government, *Letter from the Minister for Rough Sleeping and Housing to local authority chief executives*, 28 May 2020.

2.9 The Department has been collecting data on a weekly basis from local authorities since the start of June, and these data appear to confirm the upward trend in numbers of rough sleepers. The data were gathered at speed, and have not been independently validated. The Department has not yet put these data in the public domain but is currently considering how and when it can best publish the data.

Non-UK nationals who are ineligible for benefits

2.10 The immigration and visa status of rough sleepers who are non-UK nationals can affect their legal entitlement to benefits. Some are immigrants from countries outside the European Economic Area (EEA),²⁰ whose visas impose the condition that they have ‘no recourse to public funds’. Another group ineligible for benefits are those without valid immigration status (such as visa overstayers, illegal entrants and refused asylum seekers).²¹ Local authorities may, however, legally bring rough sleepers from these groups into emergency accommodation if, following an individual assessment, they understand there to be a risk to life, such as during extreme winter weather.

2.11 In its initial communications with local authorities regarding Everyone In, the Department encouraged local authorities to accommodate rough sleepers irrespective of their immigration status or entitlement to benefits, due to the health risks posed by the pandemic. As at mid-May, local authorities reported having taken in 2,500 people who were not eligible for statutory homelessness assistance (that is, because of their immigration status).²² On 28 May the Department wrote to local authorities to remind them that they could still only legally accommodate people who were ineligible for benefits following an individual assessment of risks to life.²³ Some local authorities we spoke to considered the Department’s messaging to have changed in this letter. Some local authorities responded to this by taking a tougher line on or ceasing to take in new rough sleepers who were ineligible for benefits, and by seeking to move on those already in emergency accommodation.

20 The EEA comprises EU member states plus Iceland, Liechtenstein and Norway. Additionally, Swiss nationals have similar rights.

21 EEA nationals may also be subject to some restrictions on eligibility for welfare benefits and housing assistance, for instance if they are out of work. However, the government has suspended an EU derogation relating to freedom of movement, to allow local authorities to house EEA nationals who are not in employment. In 2019 this suspension was applied in areas of the country with high levels of EEA migrant homelessness; in June 2020 the Department extended it to the whole of England up to the end of the year.

22 See footnote 17.

23 See footnote 19.

2.12 In June and July, as the national lockdown was eased, the Department believed it was becoming increasingly difficult for local authorities to maintain that all rough sleepers were facing a risk to life by staying on the streets, which had been the basis for supporting those ineligible for benefits in hotels. However, the Department was aware by this point that local authorities were finding it more difficult to move people ineligible for benefits from hotels into long-term accommodation. It was easier for UK nationals to be moved on because they were able to claim Local Housing Allowance to assist with the costs of moving into the private rental sector, and local authorities were able to help further by paying their deposit and first month's rent. Those ineligible for benefits were unable to claim this support. Because local authorities were reluctant to evict them back onto the streets, many of this group stayed in hotels for a prolonged period. At the end of September, those ineligible for benefits numbered around 2,000 (approximately 50% of the total) of those staying in hotels and other emergency accommodation in London under Everyone In. Numbers outside London were much smaller.

2.13 In September 2020 the Department began work with the Home Office on internal plans to address rough sleeping and immigration issues. This is intended to support Department-led efforts to end rough sleeping among the non-UK population.

Safeguarding rough sleepers during winter 2020-21

2.14 In June the Department announced a £105 million fund for local authorities to support those taken into emergency accommodation to move on into more settled accommodation.²⁴ In September the Department announced the award of £91.5 million (of the planned £105 million fund) to local authorities whose bids were successful, with this funding supporting the ongoing accommodation of people in hotels, as well as supporting their moves into other accommodation.²⁵ In October, drawing on its shortfall in planned spending on interim accommodation, it announced a £10 million Cold Weather Payments fund to support rough sleepers (**Figure 5**).²⁶

Night shelters

2.15 Often run by faith and community groups, night shelters generally offer communal sleeping arrangements and meals within a temporary setting, such as church halls. They tend to be operated over the winter and are a particular feature of rough sleeping support in cities such as London and Manchester. During the initial phase of Everyone In the Department asked local authorities to take in all those who had been sleeping in them, owing to the risks of COVID-19 transmission.

24 Ministry of Housing, Communities & Local Government, *£105 million to keep rough sleepers safe and off the streets during coronavirus pandemic*, press release, 24 June 2020.

25 Ministry of Housing, Communities & Local Government, *274 councils set to receive housing support for vulnerable people*, press release, 17 September 2020

26 Ministry of Housing, Communities & Local Government, *Rough sleepers to be helped to keep safe this winter*, press release, 13 October 2020

Figure 5

Key funding streams for local authorities announced from May 2020

The Department has announced £312.5 million in different funding streams since May 2020

Date announced	Amount allocated for 2020-21 (£m)	Details of funding stream
24 May 2020	161	Part of four-year funding stream announced in the budget, brought forward for 2020-21 to provide 3,300 new homes by 31 March 2021.
18 July and 17 September 2020	91.5	Part of £105 million allocated to local authorities to provide interim accommodation.
24 June 2020	23	Support for tackling substance abuse.
13 October 2020	12	£10 million Cold Weather Fund, and £2 million for faith and community groups.
5 November 2020	15	Protect Programme for winter 2020.
8 January 2021	10	Extra COVID protection for rough sleepers.

Source: National Audit Office analysis of Ministry of Housing, Communities & Local Government announcements

2.16 In June the Department began examining the possibility of allowing night shelters to reopen, as part of its planning for supporting rough sleepers over winter 2020-21. The Department understood shelters to be particularly important for safeguarding those who are ineligible for benefits over the winter, given the potential legal difficulties for local authorities in supporting them to move into long-term accommodation, or to stay in hotels indefinitely. The Department also felt there was a need to provide guidance to faith and community groups running the shelters in order to minimise the risk of COVID-19 transmission in the event that they sought to open winter shelters on their own initiative, and to support them to provide alternative provision. Over the summer and early autumn, it formed a working group with representatives of the homelessness and shelter sector, local authorities, and Public Health England (PHE) to discuss the circumstances under which it might be possible for night shelters to reopen. PHE's position is that there remains a risk of transmission of COVID-19 while there is ongoing community transmission. The collective position of the Department and PHE, supported by the working group, was that shelters should only reopen as a last resort to protect against the risk to health and life of individuals remaining on the streets when other alternative options are unavailable, for example in very cold weather.

2.17 In October, the Department published operating principles for the shelter sector stating that these principles should be followed ahead of any night shelters reopening, subject to local risk assessments on whether shelters may open in a local area, with input from the local director of public health.²⁷ Alongside this, the Department announced a £2 million fund for faith and voluntary groups to help transform night shelters to make them safer for use.²⁸ At the same time it underlined that shelters posed a risk of COVID-19 transmission and should only be used as a last resort.

Protect Programme

2.18 On 5 November the Department unveiled the Protect Programme.²⁹ It described this as a new scheme, to run alongside the ongoing Everyone In campaign, and provided an additional £15 million to those local authorities with higher numbers of rough sleepers. It asked these local authorities to use this funding to provide accommodation to those currently sleeping rough, prioritising those they assessed as clinically vulnerable. It did not mention those who are ineligible for benefits within its communications. During the winter of 2020-21 there was a significant increase in the rate of transmission of COVID-19 in England. In response to this, in January 2021 the Department announced that it was making an extra £10 million available to local authorities. This funding was intended to support local authorities to provide accommodation to people still sleeping rough, including people who had previously refused accommodation. The Department also asked local authorities to work with rough sleepers to get them registered with a GP or other health provider, so they could more easily get a COVID-19 vaccination, in line with the priority groups outlined by the Joint Committee on Vaccination and Immunisation.

Next Steps Accommodation Programme: delivering long-term accommodation

2.19 In the March 2020 Budget, the Chancellor allocated £381 million over four years to providing accommodation for up to 6,000 rough sleepers (£237 million for accommodation, plus £144 million for associated support services).³⁰ On 24 May, the Department announced that this funding would be increased to £433 million, with £161 million brought forward to 2020-21, to support the accelerated delivery of 3,300 housing units by the end of March 2021.³¹ Of the £161 million, £130 million is capital funding for the acquisition or renovation of homes and £31 million is revenue funding for tenancy-sustainment support.³² The Department invited local authorities to submit bids for this funding between 18 July and 20 August.

²⁷ Ministry of Housing, Communities & Local Government, *COVID-19: provision of night shelters*, 13 October 2020.

²⁸ See footnote 26.

²⁹ Ministry of Housing, Communities & Local Government, *Jenrick launches 'Protect Programme': the next step in winter rough sleeping plan*, press release, 5 November 2020.

³⁰ HM Treasury, *Budget 2020: Delivering on our promises to the British people*, HC 121, March 2020, para 2.63.

³¹ Ministry of Housing, Communities & Local Government, *6,000 new supported homes as part of landmark commitment to end rough sleeping*, press release, 24 May 2020.

³² Ministry of Housing, Communities & Local Government, *Next Steps Accommodation Programme*, 18 July 2020.

2.20 The Department had planned to announce allocations for funding in September, but assessing bids was more complex and took longer than anticipated, in part due to workload demands stretching staff capacity. On 29 October it announced awards of more than £150 million to 276 local authorities. Despite the delay in announcing funding awards, as of late September the Department remained reasonably confident that local authorities would be able to deliver the 3,300 units by the end of March 2021. In part this is because it was aware that some local authorities were already planning to purchase this housing, after giving them indicative approval for their bids in advance of the formal announcement. It was also because, in modelling how these funds would be spent to deliver these homes so rapidly, the Department was expecting the majority to involve the purchase or leasing (for a minimum of three years) of existing buildings, rather than those which had been newly constructed. The Department's working assumption is that individuals accommodated in these units will stay in them for two years on average, before moving into the private rental sector, social housing, or supported housing.

Rough Sleeping Strategy review

2.21 By early 2020 the Department had identified a need to review its Rough Sleeping Strategy.³³ The Department's current strategy dates from the previous government, which had a target of ending rough sleeping by May 2027. The current government was elected in December 2019 with a manifesto commitment to bring forward this target to the end of the new Parliament, May 2024. In February 2020 the Department asked Dame Louise Casey to lead a review of its strategy, reappraising its measures in the light of the new target. Due to the prioritisation given to the pandemic from March onwards, this review did not commence work. As of November 2020, the Department did not have renewed plans for carrying out this review.

Appendix One

Our investigative approach

Scope

1 We conducted an investigation into the rehousing of rough sleepers during the COVID-19 pandemic by the Ministry of Housing, Communities & Local Government (the Department). This covered:

- the steps taken at the outset of the pandemic;
- the information held by the Department on those at risk of rough sleeping; and
- subsequent steps that the Department has taken to provide long-term accommodation to those at risk of rough sleeping.

Methods

2 In examining these issues, we drew on a variety of evidence sources.

3 We interviewed key individuals from the Department to establish the approach the department had taken to rehousing rough sleepers. We also interviewed Baroness Louise Casey for the same purpose. We interviewed staff from Homes England to establish details on the Next Steps Accommodation Programme.

4 We interviewed a range of stakeholders representing organisations involved in the rehousing of rough sleepers and other homelessness groups:

- Glass Door;
- Crisis;
- Homeless Link;
- Shelter; and
- St. Mungo's.

- 5** We consulted with key academics with expertise in homelessness and the public health of rough sleepers: Dr Peter Mackie of Cardiff University, Dr Al Story and Professor Andrew Hayward of University College London and Suzanne Fitzpatrick, Professor of Housing and Social Policy in the Institute for Social Policy, Housing, Environment and Real Estate (I-SPHERE), Heriot-Watt University.
- 6** Dr Andrew Walker and Dr Jonathan Carr-West of the Local Government Information Unit hosted a round table for us in which we gathered intelligence about the rehousing of rough sleepers during COVID-19. This was attended by representatives of the London Borough of Hackney, London Borough of Southwark, Bristol City Council and Social Finance.
- 7** We interviewed local government bodies involved in the rehousing of rough sleepers: the Greater London Authority; the London Borough of Southwark; Hastings Borough Council; and Blackpool Council.
- 8** We reviewed financial returns submitted to central government by local authorities in order to determine their spending and forecast spending on the rehousing of rough sleepers.
- 9** We reviewed internal departmental documentation and management information including that related to the rough sleeping taskforce.

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National Audit Office

Design and Production by NAO External Relations
DP Ref:009223-001

£10.00

ISBN 978-1-78604-352-8



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