



Homelessness and rough sleeping in the time of COVID-19

5 May 2021

*By Christine Whitehead (LSE London), Kath Scanlon (LSE London),
Ann Edge (LSE London), Nancy Holman (LSE),
Martina Rotolo (LSE London), Fanny Blanc (LSE London)*



Acknowledgements

We would like to thank everyone who has so generously given their time to us, sometimes on many occasions. Our discussions have been both a pleasure and amazingly informative about the shared experience of all those working in this area over the past year. We are immensely grateful – and look forward to talking to you all again.

We also wish to thank Beth Crankshaw for her contribution to the early stages of this research project and for her continuing interest in our work.

Finally we are immensely grateful for all the support that Trust for London and the LSE have given us throughout this project.

Table of Contents

| | |
|--|-----------|
| Executive Summary | 4 |
| 1 Introduction | 7 |
| 1.1 Our Research | 7 |
| 1.2 Policy Background | 7 |
| 1.2.1 <i>Traditional homelessness</i> | 8 |
| 1.2.2 <i>COVID-19 policy responses</i> | 8 |
| 1.2.3 <i>Street homelessness and rough sleeping</i> | 8 |
| 1.3 Some Numbers | 9 |
| 1.3.1 <i>Numbers in temporary accommodation</i> | 9 |
| 1.3.2 <i>Numbers of street homelessness/ rough sleepers</i> | 9 |
| 1.4 Funding | 9 |
| 1.5 The report | 10 |
| 2 How Local Authorities in London have Coped | 11 |
| 2.1 Introduction | 11 |
| 2.2 Similarities and Differences | 12 |
| 2.3 The first few weeks..... | 12 |
| 2.4 A continuing flow of people onto the streets | 13 |
| 2.5 A continuing need for temporary accommodation..... | 13 |
| 2.6 Working Collaboratively?..... | 14 |
| 2.7 The easing of lockdown 1..... | 14 |
| 2.8 Staffing..... | 15 |
| 2.9 The second and third lockdowns..... | 16 |
| 2.10 What we have learnt | 18 |
| 2.11 Conclusions | 18 |
| 3 COVID-19 and the Private Rented Sector | 20 |
| 3.1 The situation around August 2020 | 20 |
| 3.1.1 <i>How many of these might potentially at risk of eviction?</i> | 20 |
| 3.1.2 <i>How many will actually be threatened with eviction?</i> | 21 |
| 3.2 Following on from the August extension..... | 21 |
| 3.2.1 <i>How many evictions?</i> | 22 |
| 3.2.2 <i>How will those in arrears but not formally evicted be expected to cope?</i> | 22 |
| 3.2.3 <i>What proportion will end up homeless?</i> | 22 |
| 3.3 April 2021 – A very long haul to normality? | 22 |
| 3.3.1 <i>How many people are at risk?</i> | 23 |
| 3.3.2 <i>Can the courts cope?</i> | 24 |
| 3.3.3 <i>When will ‘normality’ return?</i> | 24 |
| 3.3.4 <i>What changes need to be made?</i> | 25 |
| 3.4 What do we recommend?..... | 25 |
| 3.5 Conclusions | 26 |
| 4 The Everyone In initiative: the numbers | 27 |
| 4.1 The published statistics..... | 27 |

| | | |
|-------|---|-----------|
| 4.2 | Understanding the figures | 28 |
| 4.2.1 | Background | 28 |
| 4.2.2 | How many have actually been helped? | 28 |
| 4.2.3 | How many were sleeping on the streets? | 29 |
| 4.2.4 | How many have been moved on successfully into settled accommodation | 29 |
| 4.3 | Conclusions | 30 |
| 5 | The Costs to London boroughs of accommodating rough sleepers..... | 31 |
| 5.1 | Introduction | 31 |
| 5.2 | The ‘Everyone In’ policy and what it required | 31 |
| 5.3 | Why the cost-estimation exercise was carried out | 31 |
| 5.4 | How the numbers were collected | 31 |
| 5.5 | Caseload | 32 |
| 5.6 | Net expenditure | 33 |
| 5.7 | What we have learned | 34 |
| 6 | Conclusions & Recommendations: Homelessness in a time of COVID-19..... | 36 |
| 6.1 | What will happen next? | 36 |
| 6.2 | What should be done? Our recommendations | 37 |
| 6.2.1 | Addressing evictions in the private rented sector..... | 37 |
| 6.2.2 | Addressing the elimination of street homelessness and rough sleeping | 38 |
| 6.2.3 | Integrating the system | 38 |
| | Appendix 1: Policy changes in response to the pandemic..... | 39 |
| | Appendix 2: Funding announced by MHCLG | 41 |
| | Appendix 3: Sub-regional data on rough sleepers in London..... | 45 |

Executive Summary

1. Objectives

The objectives of this study are to review how COVID-19 has impacted on the problems of homelessness and rough sleeping; to clarify how policies, implementation and funding have changed; and to ask where we go from here. In particular, we look at how local authorities have changed their approach; the relationship between private renting and homelessness; and the effectiveness of the *Everyone In* initiative.

2. Methods

There were three main elements to our research approach. First, between late July 2020 and early March 2021 we carried out a number of interviews with senior staff in 12 boroughs spread geographically across London, together with representatives from the GLA, homelessness charities and other agencies operating in London. Secondly, we examined at different points in time how the suspension of evictions in the private rented sector might work its way into homelessness over the next year. Thirdly, we reviewed the estimates of the number of people who have been assisted by the *Everyone In* initiative, the costs to London authorities and more generally how the initiative might be assessed.

3. The Impact on Local Authorities and the continuing need for temporary accommodation

- In response to COVID-19 local authorities were faced with both increasing responsibilities and the need to implement quite different approaches to help both ‘traditional’ homeless households and those affected by the *Everyone In* initiative.
- Although there was some commonality in boroughs’ experiences across London during the first lockdown and later, there was also considerable variation in approach.
- During this first year of the pandemic the accommodation and support needs of rough sleepers have dominated the homelessness agenda. And despite success in bringing people off the streets and rehousing others from shared facilities, a continuing flow of people has appeared or reappeared in need of support throughout the pandemic. As a result, in total far more people were accommodated than expected.
- Meanwhile, the ban on evictions and the furlough scheme have protected many ordinary households from the full economic impact of successive lockdowns. But move on for those already in temporary accommodation has been difficult and there is real concern about the projected growth in demand for temporary accommodation from households facing homelessness once the ban on evictions is lifted and unemployment rises later this year.

4. The private rented sector: some numbers on those at risks of eviction

- One of the most obvious concerns arising from the COVID-19 crisis was the fear that there would be mass evictions in the face of rent arrears. The government responded with suspensions of notice and eviction which still continue. There is thus a backlog of people under threat.
- Around 6 – 7% of tenants appear to be in arrears – around twice the ‘normal’ proportion. Some 10% of private tenants are thought to be unemployed, about double the average rate.
- Given projections of unemployment and the relationship between unemployment and rent arrears, over 400,000 tenant households might be expected to be in significant arrears at the end of the year.
- In many cases landlords and tenants have found ways of coping. But the longer tenants remain in accommodation where they can’t pay the rent, the higher their future debts will be and the greater difficulties facing both tenant and landlord.
- Perhaps most importantly, the courts will face major difficulties in coping with any significant increase in landlord claims. As a result, the time taken to get an order, let alone to gain possession will almost certainly increase significantly - implying that most cases now entering the system will not be completed until well into 2022.
- What impact this will have on the private rented sector into the medium term is unclear – but almost certainly undesirable.

5. Everyone In: some numbers on temporary and settled accommodation

- Prior to the pandemic the number of those sleeping rough was measured at around 4,250 in November 2019. By May 2020 nearly 15,000 people had been accommodated (around 30% in London), including many who had been living in COVID-19 unsafe accommodation. Based on November 2020 evidence the NAO suggested that over 33,000 had been helped while the latest figures quoted by the MHCLG Select Committee suggested the figure had risen to 37,500 by March 2021. Numbers of those moved on to settled and supported accommodation were stated to be of the order of 26,000.
- However, looking at the numbers, it remains unclear how many people were actually helped during the pandemic. Some evidence from London suggests that at around 25% of those who have been accommodated in emergency accommodation have left voluntarily, perhaps only to reappear at least once or on multiple occasions. The numbers of those who have actually been helped is therefore unclear.
- Perhaps more importantly an unknown proportion of those counted were already in the system, although in COVID-19 unsafe accommodation – and would already have been receiving other assistance. Being unable to separate these two groups makes assessment of the requirements for different types of support extremely difficult- especially as included in those moved on to ‘settled’ accommodation are unknown proportions of those who were allocated short term supported accommodation.

6. The costs of the Everyone In in London

- According to LSE London calculations, London boroughs could have been expected to incur costs net of Housing Benefit of approximately £59.0 million in the first year, from April 2020 – March 2021 including the costs of temporary and move-on accommodation as well as support. Separately, the GLA expected to spend some £39.8 million accommodating rough sleepers in the first year – so a total of nearly £100 million.
- In addition, there would be follow-on costs in subsequent years, mostly because former rough sleepers often have additional support needs. The boroughs estimate costs at £31.3 million in the next financial year, while the GLA expects to spend £13.1 million after the first year. This brings the total cost to London local government of accommodating the roughly 6700 ‘Wave 1’ of rough sleepers to £143.2 million, suggesting a per-capita cost for the Wave 1 cohort of £21,400.
- The average annualised cost of temporary accommodation reported by the boroughs was £15,500 for each individual non-NRPF case (although note that not all individuals remain in TA for a full year). This is somewhat lower than the average costs of nightly paid accommodation in London. The cost of hotel accommodation was somewhat higher, at £19,900 per annum. For NRPF cases, the estimated annual cost of move-on accommodation was lower, at £13,500.

7. Main Recommendations

- In terms of **policy**:
 - Section 21 evictions should be stopped immediately to give more security to private tenants.
 - LHA should be kept at the thirtieth percentile. The welfare cap also needs to be reviewed in the light of these payments.
 - The £20 UC uplift should be maintained and the possibility of government paying rent to the landlord during the 5-week waiting period should be examined.
 - Government should support greater investment on prevention services including Discretionary Housing Payments.
 - More help to mitigate arrears should be provided – eg through low interest rate loans to tenants with less than 6 months’ arrears.
- In terms of **practice**:
 - Evictions by social landlords should continue to be restricted to help limit private sector delays.
 - Courts need more resources but also should develop streamlined procedures to reduce projected delays.
 - Court proceedings for egregious cases and more than six months’ arrears must be speeded up.

- A pre-action protocol for the private sector should be put in place for all notices of eviction issued after May 31st.
- The potential for greater integration of the management of main duty and rough sleeper temporary accommodation at local authority level should be reviewed.
- A full social cost benefit evaluation of the *Everyone In* initiative, based on great understanding of process and outcomes should be undertaken.

1 Introduction

By Christine Whitehead and Martina Rotolo

1.1 Our Research

The COVID-19 pandemic has led to a number of initiatives by government to try to protect both the street homeless and those facing eviction from the private rented sector. In response to these initiatives LSE London undertook research sponsored by LSE and by Trust for London on a number of different aspects of both the implementation of these initiatives and their potential outcomes¹.

These included:

- (i) understanding the numbers of those affected and their experience;
- (ii) how local authorities in London had responded to the crisis with respect to households coming forward to local authorities through the traditional homelessness routes and obtaining either prevention support or accepted as in need of temporary accommodation;
- (iii) how local authorities, charities and the GLA implemented the government's Everyone In initiative which accommodated people from off the streets or in COVID-19 unsafe accommodation;
- (iv) the costs to London boroughs associated with the Everyone In initiative;
- (v) the impact of the pandemic on unemployment and rent arrears and thus on housing conditions in the private rented sector;
- (vi) how housing conditions may change as the government starts to return to normal rules around eviction over the coming months;
- (vii) the potential impact on homelessness over the coming year; and
- (viii) how the private rented sector might respond to changing market and regulatory conditions.

In this report we bring together the findings from these different strands of research; take stock of the current situation and what has worked well during the crisis; draw out some implications for future policy; and suggest some ways forward which might help achieve longer term solutions.

1.2 Policy Background

In general, the action taken on homelessness during the pandemic was built on the Homelessness Reduction Act (HRA), in force since April 2018. This placed new duties on public bodies to work together to address homelessness. In particular, it put very much more emphasis on homelessness prevention so that households in fear of homelessness could get help from their local authority well before they faced eviction.

However, it is important to recognise that there are two quite distinct routes to homelessness support. First there is the traditional approach by which people come forward to the local authority and are given support and if eligible will be provided with temporary accommodation.

¹We would like to thank both Trust for London and the LSE for their generous financial support but also for their time and commitment to this topic. We also want to thank the very large numbers of people who have helped us during our research.

1.2.1 *Traditional homelessness*

Under the **Homeless Reduction Act** anyone has the right to come forward to their local authority if they are actually or in danger of becoming homeless. They will then be determined whether the authority has a prevention duty – providing advice, support and sometimes intervention eg to persuade a landlord to continue a tenancy - or a main duty - by which the authority must provide temporary accommodation.

One of the most important reasons for people becoming homeless is the threat or reality of eviction from the private rented sector. Before the start of the pandemic, eviction notices for private tenants could be enforced in accordance with either:

- **the Housing Act 1988** which introduced Assured Shorthold Tenancies (ASTs) as the usual form of tenancy in the private rented sector. Most AST leases were for either 6 months or one year. **Section 21** of the Act allowed landlords to end a tenancy at the end of its term without needing to give a reason – often known as no fault evictions. Such evictions had to be ratified by the Courts. If the tenancy agreement
- **Section 8** which requires that landlords must specify how the tenancy agreement has been broken and give 2 months' notice.

Households coming forward to local authorities for assistance have traditionally been mainly couples usually with children and single parent families. However, since the Homelessness Reduction Act many more single people have come forward, although the majority will only receive advice rather than accommodation.

According to Shelter UK (2021) the main reasons for becoming homeless are: not being able to find suitable accommodation without support, housing becoming unreasonable to occupy, mental and physical ill health, disabilities, substance and/or alcohol misuse, domestic abuse, unaffordability of private renting (e.g. housing benefits not covering the cost of the rent). An article published in November 2020 by the House of Commons Library also reported that the increase in statutory homelessness since 2009/2010 could be attributed to continuing shortfall in levels of affordable housing (Barton and Wilson 2020). Housing Benefit reforms are also viewed as a significant contributory factor, particularly in London (Barton and Wilson 2020).

1.2.2 *COVID-19 policy responses*

Appendix 1 sets out the main government policy responses to the threat of eviction. The Government firstly suspended evictions for a period of 90 days in March 2020. The ban on evictions has been extended first in June and then in August until 20th September 2020. Then, possession orders restarted on September 21st 2020 and will remain in force until 30 July 2021 with new requirements for claimants.

Other policies mainly involved extending required notice periods before landlords could go to Court to start the eviction process; and suspension of bailiff powers actually to evict. Under the initial legislation – the Coronavirus Act 2020 - notice periods for both private and social landlords were extended, first to three months and then later in the year to six months, including those affected by Section 21 and those in rent arrears or breaking other contractual requirements (except for the most egregious behaviour).

Finally, when eviction notices had been issued, these were not allowed to be implemented by bailiffs during lockdowns from September 2020 onward. This ban has now been extended to May 31st 2021 at which point it is also assumed that notice periods will be reduced and courts will be expected to operate normally.

1.2.3 *Street homelessness and rough sleeping*

Prior to the pandemic street homelessness/rough sleeping was addressed through a number of central government funded initiatives which culminated in the Rough Sleeping Strategy to be updated every year. This included 61 detailed commitments aimed at halving rough sleeping by 2022 and end it by 2027. As such it involved a wide range of agencies and charities and in the man operated separately from the traditional homelessness pathways which worked directly through local authorities.

Then, on March 26th 2020 the MHCLG announced £3.2 millions of emergency funding to help rough sleepers to self-isolate. This was the start of the ‘**Everyone In**’ policy. *Everyone In* replaced the more general ‘No Second Night Out’ through partnerships between charities and local authorities which had been running for a decade. The objective was to take people off the streets or out of COVID-19 unsafe accommodation including shared accommodation and night shelters immediately and to enable them to self-isolate. As a public health emergency, needing self-contained accommodation, many rough sleepers were taken into hotels with rooms procured and block-booked by local authorities and the GLA. According to the National Audit Office (2021:7), “the Department took a ‘hands on’ approach, working intensively with local authorities, homelessness charities and hotel chains”.

1.3 Some Numbers

1.3.1 *Numbers in temporary accommodation*

In 2019 numbers in England varied from around 85,000 to 88,000 with a slight upward trend. In 2020 numbers increased with a maximum just short of 100,000 in quarter 2 and then started to fall slightly.

Those accommodated by London boroughs, by no means always in London accounted for around two thirds of all those in temporary accommodation.

Almost half of households in temporary accommodation in 2019 were single parents with dependent children with a further 20% plus being couple households with children. In London the proportion of family households was nearer 70%. In 2020 the growth in numbers was mainly accounted for by single people particularly outside London. In the second quarter of 2020 they accounted for 29% of the near 100,000 in temporary accommodation across England but only 22% in London.

1.3.2 *Numbers of street homelessness/rough sleepers*

Prior to the pandemic the figures for those sleeping rough were collected on a single night in November each year. Numbers had risen consistently from 2010 to 2017 fell slightly in 2018 and more in 2019. It was however generally accepted that the counts were underestimates. There were just over 4,250 identified as sleeping rough in November 2019. The proportion in London was very much lower than for those in temporary accommodation at a little over a quarter. The South East accounted for a further 20% plus with no other region over 500.

Because of the Everyone In initiative it is unsurprising that the November count in 2020 showed a much reduced figure of 2,688 some 63% of the previous year’s figure. The number in London at 714 showed the same proportionate reduction. January 2021 figures showed much lower numbers but these reflected the severe weather initiative to bring people in for short periods. However a study for the GLA published in September suggested that rough sleeping had actually increased by 33% in the second quarter of the year and that those sleeping rough were younger, more likely to be male and to have mental health problems (2020).

From the start of the pandemic and Everyone In in March 2020 the regular data of those who had been supported included not only those who had been accommodated from the streets but also those who had been re-housed from COVID-19 unsafe accommodation. It was not surprising that the numbers accommodated would be considerably higher than the November 2020 count. The earliest figures showed some 5,400 people had been accommodated in COVID-19 safe accommodation – often in hotels. But this figure continued to rise such that the NAO report in January 2021 suggested that over 33,000 had been accommodated. These figures will be discussed in more detail in chapter 3: ‘The Everyone In initiative: the numbers’.

1.4 Funding

According to the National Audit Office report, MHCLG did not provide any dedicated funding for Everyone In, but deployed £4.6 billion to local authorities since March 2020 to meet any additional spending on COVID-19

(NAO 2021: 7). The NAO also reported that local authorities have relied on “a combination of emergency grants, existing homelessness funding streams and own internal resources” (2021: 4) during the pandemic to tackle the impending challenge of housing the homeless and rough sleepers. In particular, MHCLG allowed local authorities to redistribute £8.2 million from the Rough Sleeping Initiative to accommodate those sleeping rough during the pandemic (NAO 2021: 7).

Appendix 2 sets out the main government funding allocations since the start of the Everyone In policy in March 2020. It is clear that some of these are repeat announcements. It is also clear that a large proportion of the funding is designated to support street homeless and rough sleepers. A particular problem with the more general funding is that homelessness has often been seen by local authorities as of lower priority than other services that have been badly affected by COVID-19.

Overall, it is not possible to identify with certainty exactly what funding has been used where. However it is clear that the government’s earlier very specific commitment to ending rough sleeping by 2024 has impacted significantly on the allocation of central government funding.

1.5 The report

The rest of this report covers three distinct research projects: (i) the first, funded by LSE on how local authorities in London responded to the pandemic both in supporting homeless households in need of temporary accommodation and implementing the Everyone In initiative (Chapter 2) and how much it cost (Chapter 5); (ii) funded by Trust for London on the numbers of private tenants that might face eviction, what could be done to limit the problems and how many might end up homeless (Chapter 3); and (iii) some analysis of the published numbers of people who have been assisted by the Everyone In initiative and the implications for longer term policy funded by ourselves (Chapter 4). Chapter 7 brings the different strands together and expands on some of our recommendations.

References

- Barton, C. and Wilson, W. (2020), *Statutory Homelessness in England: Research Briefing, House of Commons Library*, Accessed 27 April 2021, <https://commonslibrary.parliament.uk/research-briefings/sn01164/#:~:text=The%20increase%20in%20statutory%20homelessness,to%20levels%20of%20household%20formation>
- GLA (2020), *Third More Rough Sleepers on London’s Streets in Lockdown.* London City Hall, Accessed 27 April 2021, <https://www.london.gov.uk/press-releases/assembly/third-more-rough-sleepers-on-londons-streets>.
- MHCLG (2021), *Statutory homelessness in England; October to December 2020*, Accessed 27 April 2021, <https://www.gov.uk/government/statistics/statutory-homelessness-in-england-october-to-december-2020>
- NAO (2021), *Investigation into the Housing of Rough Sleepers during the COVID-19 Pandemic - National Audit Office (NAO) Report*. Accessed April 12, 2021. <https://www.nao.org.uk/report/the-housing-of-rough-sleepers-during-the-covid19-pandemic/>
- Shelter (2021), *About Homelessness*, Accessed 27 April 2021, <https://www.crisis.org.uk/ending-homelessness/about-homelessness/>

2 How Local Authorities in London have Coped

By Ann Edge

2.1 Introduction

The *'Everyone In'* policy introduced by government early on in the pandemic is widely seen as having been a success, both in getting rough sleepers off the streets and in saving lives amongst this often very vulnerable group. However, there has been little discussion about how the policy was implemented by the local authorities charged at short notice with this responsibility alongside their existing housing responsibilities, nor of the knock-on effects of introducing this initiative while authorities, their staff and their local populations were simultaneously adapting to the rapidly changing COVID-19 environment including lockdown.

This is particularly pertinent as, although rough sleeping represents the most 'visible' form of homelessness, prior to the introduction of the *Everyone In* initiative local authorities were not legally required to offer rough sleepers shelter unless they came forward as homeless and met relevant requirements. Up to this point government support for rough sleepers in London was delivered through the GLA and borough Rough Sleeping Initiative programmes both working in conjunction with a range of established Homelessness charities.

Prior to the introduction of *Everyone In*, local authorities' main homelessness responsibilities focussed on previously settled residents who had become homeless for a variety of reasons or were in danger of becoming homeless, normally housing them in one of a variety of types of temporary accommodation before finding more permanent solutions. However, despite the increase in LHA rates in April 2020, across London there is a continuing shortage of suitable, affordable accommodation for homeless households with growing competition between boroughs for available properties. The reality for many households who become homeless is a prolonged period in temporary accommodation before a move to more settled accommodation but frequently at some distance from their previous 'home' borough.

We were interested to see how London's local authorities tackled the immediate additional requirement to provide emergency accommodation for rough sleepers and subsequent move-on accommodation and how this has impacted and, may be continuing to impact, on their other pre-existing responsibilities.

Between late July and early September, we carried out a number of interviews with senior staff in 12 boroughs spread geographically across London in order to build a clearer picture of the ways in which these local authorities responded. In September and the first week of October, we also talked to representatives from the GLA, several homelessness charities and the Rough Sleeping Task Force originally headed by Dame Louise Casey.

As we completed these interviews the number of COVID-19 cases was rising again and on 31 October the government announced a second lockdown starting on 5 November for four weeks until 2 December.

On 5 November 2020, as this second lockdown started, the government announced a new scheme, the *'Protect Programme'* which was to run alongside the *'Everyone In'* initiative. Its purpose was to ensure that vulnerable people, including those sleeping rough, were protected during the second lockdown and any further national restrictions throughout the winter until March 2021. A further £15 million was made available with London included amongst the top ten areas to receive a share, targeted on those boroughs with the highest rates of rough sleeping. All councils were expected to update their rough sleeping plans by the end of 2020, providing an overview of their support for those sleeping rough.

In December, as lockdown 2 ended the country emerged into a system of Tiers graded from 1 to 4 with London initially placed in Tier 3 before being moved into Tier 4 (the highest Tier) on 20 December 2020. In the new year, a further period of lockdown was announced with Lockdown 3 starting on 5 January 2021 and on 8 January the government announced that an additional £10 million funding would be made available nationally to individual local authorities under *'Protect Plus'* in order to continue to provide support and accommodation for the homeless during the pandemic.

On 22 February the government set out a four-stage roadmap out of lockdown with full restrictions not being lifted until 21 June at the earliest, however, the government's medical officers continue to warn of the possibility of a further surge in infections in late summer 2021 associated with the easing of restrictions.

At the end of February and beginning of March 2021 we talked again to four of our previous interviewees to provide an update on their experiences over the winter months and their expectations for the future.

This part of the research therefore covers the experiences of London boroughs from the introduction of the *Everyone In* policy during the first lockdown at the end of March 2020, through the easing of restrictions over the summer to the introduction of two more lockdowns and further restrictions over the winter months.

2.2 Similarities and Differences

It was immediately apparent from the interviews that although there had been some commonality in borough experiences across London during the first lockdown and the immediate aftermath there had also been considerable variation - beyond that which might have been expected.

In addition to the numbers of rough sleepers within a borough and the extent of their needs, other contributing factors included the numbers and types of properties within the borough which could be used or adapted for emergency accommodation and the extent to which properties already in use for temporary accommodation were no longer deemed suitable – for example B&Bs or hostels where shared facilities made them COVID-19 non-secure so that families housed in them also needed to be rapidly rehoused. In some instances, staff shortages caused their own problems as well as exacerbating problems associated with the rapid transition to working from home and providing housing and other services online.

Adding to these variations were organisational structural differences adopted by individual local authorities, different interpretations of guidance provided and, of course, political control.

2.3 The first few weeks

On Thursday 26 March the Minister for Local Government and Homelessness wrote to all local authorities asking them to urgently accommodate all rough sleepers and, given that lockdown had been announced a few days earlier, making it clear that it was 'now imperative that rough sleepers and other vulnerable homeless are supported into appropriate accommodation by the end of the week.' The immediate focus for local authorities of the *Everyone In* policy was on finding an adequate supply of accommodation whilst at the same time establishing the particular needs of the individuals who would be rehoused.

At the same time, it also became apparent that many of the night shelters and hostels already providing dormitory style accommodation and shared facilities for rough sleepers could no longer operate on health grounds. These facilities appear often to have been the first to be emptied by local authorities working in conjunction with the homelessness charities.

Hotel rooms, available as a result of lockdown and other travel restrictions, provided one accommodation solution but are, of course, not evenly spread across London so that some local authorities, at least initially, ended up moving rough sleepers out of borough and competing for spaces amongst themselves. The GLA also took part in the initiative adding to the scramble for suitable space by seeking to accommodate, at least at first, homeless groups such as those living in Heathrow Airport and many of those from the night shelter closures. One interviewee commented that the initiative had almost stalled in the initial phase as it seemed there was simply not enough space for everyone. At the same time, a lack of clear knowledge about the amount and type of space required and the length of time it would be needed, as well the chaotic life-styles of some rough sleepers and their associated medical and social care needs – not to mention the accompanying dogs - led to concerns about the costs involved and the contracts negotiated. Food supplies had to be organised at a time when supermarkets were rationing purchases and catering companies were out of action due to lockdown. PPE was hard to acquire and staff had to be diverted into new roles. Outreach workers, for example, were frequently diverted to provide a variety of support services including live in support and, where necessary, security staff

were brought in to maintain stability in hotels housing those with more complex needs. Initially, outreach workers and others did not have key worker status which added to their problems of carrying out their responsibilities on the streets.

Health screening was necessary to establish if people needed to self-isolate and a COVID-19 Care Hotel was opened first in Pimlico and subsequently at London City Airport to provide immediate medical assistance. However, in the event, this was not as intensively used as anticipated. The policy priority was about saving lives and fear was a factor which brought some rough sleepers in off the streets, although some still argue that a proportion of those with the highest support needs were failed and indeed never really left the streets or returned to them very quickly.

2.4 A continuing flow of people onto the streets

Despite the overall success of the *Everyone In* policy it was also noted that both the numbers being accommodated were significantly higher than expected and that a steady flow of new people continued to arrive onto the streets throughout the pandemic.

To some extent this was made up of non-UK nationals with No Recourse to Public Funds (NRPF) who were found to make up a significant proportion of the rough sleepers housed in hotels, with seven of the twelve boroughs estimating that they accounted for around 40-50% of the total. It was thought that many had previously been part of what has been referred to as the hidden homeless - sofa surfing with friends or living in accommodation tied to jobs in the informal sector which were lost with the advent of lockdown. This group were far less likely to have multiple and complex needs, though frequently have very complex immigration issues. Several authorities noted that many of these issues were not easy to resolve and predicted that there would be a need for a continuing longer-term involvement.

In addition, family breakdown, violence and other factors which might have been exacerbated by the lockdown drove others onto the streets possibly for the first time.

2.5 A continuing need for temporary accommodation

Facing an increased demand for temporary accommodation and a reduction in the availability of certain types of property, predominantly those with shared facilities, other solutions were explored. Local authorities reported making use of buildings on the point of demolition or development to convert into accommodation. In addition, empty accommodation on estates ready for regeneration plus other voids were increasingly brought into use where available.

In these early months, all boroughs reported very little evidence of illegal evictions taking place during the ban on evictions imposed by government at the start of lockdown, but there was considerable concern about the numbers of evictions that might take place once the restrictions were lifted. Boroughs generally reported an increase in numbers of households approaching them seeking advice. Where they could, many authorities reported that they were already working through their prevention teams with both tenants and landlords to see if there was a way of resolving the situation.

The fears that lockdown would lead to an increase in domestic violence had not at the time of the first round of interviews materialised. However, local authorities were also monitoring rising numbers claiming universal credit or some form of business relief together with the numbers of people furloughed, in anticipation that a growing number of people would not be able to meet the cost of their rent and that people previously secure in long-term employment might find themselves in difficulties. While this was a general concern for all boroughs, variations between boroughs in the proportions housed in the private rented sector led to some boroughs being particularly concerned about the potential future impact.

2.6 Working Collaboratively?

One consequence of the pandemic and, in particular, the *Everyone In* policy has been a shift in the working relationships between those involved in addressing homelessness. As the policy was driven by public health concerns there was far greater involvement by health workers in the initial screening of rough sleepers being moved off the streets in order to establish their general health needs as well as for signs of the virus. As time has gone on there has been a corresponding focus on their mental health needs. Both were universally seen as a positive development and have subsequently extended into the drive to get rough sleepers registered with a GP in order that they can be given the vaccination.

The *Everyone In* policy was implemented by the Ministry of Housing, Communities and Local Government (MHCLG), leading to the regular contact between it and the boroughs and homelessness charities increasing considerably. Although greeted mainly positively by the homelessness charities we talked to, there was a more mixed reaction from the boroughs. Whilst some boroughs were positive about their relationships with their MHCLG adviser, there was considerable criticism of the department in its failure to bring to a clear end the *Everyone In* initiative, leaving the continuing responsibilities to the boroughs whilst not enabling the boroughs to fully deliver. Despite acknowledging that additional funding was being made available, local authorities were concerned at the time whether they would be fully reimbursed, with one interviewee also making clear that ‘when you dig down, it (the additional funding) does not deliver what the local authorities want – supported housing and those with NRPF to be accommodated’.

There was also concern that within government the Home Office, Department for Work and Pensions and MHCLG did not speak to each other and seemed to operate ‘on different planets’.

There was considerable criticism and very little support for the GLA which was seen as having moved into territory it had not occupied pre-COVID-19, raising issues for the boroughs. Acting as a middle-man, it was seen as adding more barriers and obstacles – a further layer of bureaucracy. It was also perceived as having aligned itself with MHCLG to work in a bubble where local authorities were not seen as relevant stakeholders. As a consequence, one borough felt the link between the GLA and local authorities on rough sleepers had been broken. However, longer term, another borough queried whether responding to the needs of rough sleepers should be left to individual boroughs or whether it should be in the remit of a statutory body under which the boroughs would work. Both the GLA and Task Force interviewees saw a possible future role for pan London homelessness services but recognised that this would continue to generate friction between the local authorities and the GLA. The boroughs, when they expressed a view, were generally more in favour of working at a sub-regional level together with adjacent authorities.

2.7 The easing of lockdown 1

As the first lockdown started to ease, pressure was put on local authorities to explore ways in which to move rough sleepers on into more settled accommodation. Decanting people from the hotels into suitable accommodation added not only to authorities’ usual workload of providing accommodation for those continuing to present through normal channels as well as people looking to move on from temporary accommodation, but also increased demand for suitable affordable accommodation, already in short supply. There was an acknowledgement that in addition to the public health benefit of accommodating rough sleepers, the provision of better quality, self-contained hotel rooms had helped some rough sleepers to regain a greater sense of dignity and an incentive to move forward into more settled accommodation. But amongst those most involved with the *Everyone In* initiative there was a perception that the speed of its introduction had led to a focus on making sure everyone was accommodated and as few as possible slipped through the net at the expense of simultaneously planning how they might move people on at the end of the initiative.

The main routes for rough sleepers out of the hotels or other emergency accommodation were via the private rented sector, which is not appropriate for all, or via acceptance on to local authority pathway schemes primarily into supported housing. One borough suggested that as many as two thirds of its rough sleepers were not suitable for the PRS largely because of their very complex needs and sometimes anti-social behaviours. At the same time, some interviewees expressed concern that with delays in starting and operating the pathway schemes some rough sleepers were being transferred into temporary accommodation without the appropriate

support structures and were returning to the streets. A further route on from the streets had, in normal times, been through Hubs such as the Clearing House which moves rough sleepers on to tenancies in Housing Association flats specifically ring fenced for rough sleepers, but lockdown had made the operation of many of these services impossible with very little associated move on taking place.

There was some concern that as the lockdown restrictions started to ease and more people started to return to work, the opportunity for begging as a source of income for people living on the street would reopen. As a result, some former rough sleepers undoubtedly did return to the streets, but it was believed that most were still being accommodated overnight.

More generally, as decisions had to be made as to who would be offered move on accommodation, it was noted by some that the usual criteria for determining priority for accommodation had had to change so that, for example, despite the easing of restrictions, allocations continued to be made on the basis of those at greatest risk from COVID-19. It also quickly became apparent that rough sleepers with the greatest support needs should be placed in temporary accommodation within borough or as close as possible, with those with lower support needs further away.

However, as previously noted, across London there is a continuing shortage of suitable affordable accommodation and competition between boroughs for available properties is an ongoing concern. Interviewees felt it was too early to say how future changes in demand amongst tenants for properties in the private rented sector might play out with landlords and whether this might, potentially, make local authority placed tenants more attractive. But alongside this, several boroughs felt that relationships with some landlords had suffered during lockdown, in particular, placing some single rough sleepers in the PRS had soured relationships as a result of consequential anti-social behaviour. Some interviewees also noted that demand in the private rented sector seemed to be holding up much better in some boroughs than others. The increased demand for studio accommodation generated by the pandemic remained but, with uncertainty as to how long this would continue, there was no significant increase in supply. Some boroughs like Westminster, where much of the private rented sector had been diverted into short lets over recent years, saw the collapse of this market as an opportunity to acquire more properties for move on and at lower rents. Several outer London boroughs expressed frustration at the reduction in properties available to them as inner London boroughs acquired properties within their boundaries, sometimes by offering higher rents or greater inducements. Attempts to agree rent ceilings across boroughs were under strain and it was noted that whilst agreements on incentives could be made, some boroughs found creative ways around this. None of the boroughs interviewed managed to meet all their needs for temporary accommodation within their own boundaries, with one local authority reporting that 95-96% of its temporary accommodation was out of borough. As a result, the ripple effect of London's local authority placements outwards around London and beyond, which had already been noted pre-pandemic, was likely to have been further entrenched.

2.8 Staffing

Most authorities reported that recruiting staff of the right calibre into the housing and homelessness sector was already a problem pre-COVID-19. Many were short staffed and/or relied heavily on agency staff. In these the circumstances, the changes in working practices – working from home, the lack of face to face contact, Zoom meetings - combined with a shift in emphasis from the regular patterns of work: typically assessing the need for temporary accommodation, prevention work, sourcing temporary accommodation and move on opportunities and supporting families and individuals through these processes - to the need to accommodate rough sleepers at short notice and relocate people already living in non-COVID-19 secure shared facilities, meant that many staff had to be redeployed and required considerable versatility. The success of local authorities in adapting to these new circumstances has not necessarily been fully acknowledged or celebrated.

In addition, given these significant new demands on their employees, local authorities were widely concerned about burnout amongst staff who had worked long hours under difficult conditions over many months and whether they would be able to sustain this over the next stage. There were also concerns about recruiting and retaining staff with the necessary skills and experience. Everyone felt that they were chasing the same qualified staff and the outer London boroughs felt at a further disadvantage because of lower salary levels.

Despite this, there were also some unexpected benefits of the changing working practices. For some boroughs, the shift to dealing with new homeless cases online or by phone rather than face to face was increasingly seen as a positive development. Early concerns about individuals or families 'falling through the net' had not been fully substantiated, although there was an acknowledgement that some opportunities for prevention may have been missed.

2.9 The second and third lockdowns

The initial interviews had raised concerns centred on rough sleepers over the winter period as it had become evident that despite the large numbers already accommodated, over the summer months many more had been continuing to arrive on the streets. Many of the usual facilities such as the night shelters often run and staffed by volunteers were based on shared accommodation and, in the case of church shelters, which provided about two thirds of the venues across London, frequently involved users rotating from location to location on different days of the week. The spaces used often had multiple purposes, providing shelters overnight and used by community groups by day. As such it was not practical to consider adapting them from shared use into self-contained accommodation and with churches and other voluntary groups suffering from lost rental income during lockdown, the money to carry out the work was also not available. Although there was the possibility of some organisations taking over vacant or temporarily empty buildings for use as winter night shelters, one of the homelessness organisations had estimated that only about half of the normal number of beds would be available in London during winter 2020/21.

In the event, subsequent interviews tended to suggest that the situation had not been as bad as first feared. More beds in some form of night shelter had been provided than had been anticipated given the short time frame for adaptations. Many of these were in the central areas where demand continued to be significant and, interviewees suggested, staff professionalisation tended to be greatest. A further development was in a new alignment between some local authorities and night shelters in providing commissioned services such as running hotels, providing beds and other forms of support such as food. Interviewees also suggested that whilst the flow of new people onto the streets never stopped it had not been as bad over the winter as had been anticipated. The cold weather provision (SWEP) had brought inside again some people who had fallen out of COVID-19 emergency provision and returned to the streets, the suggestion being that for some the fear of the cold was greater than the fear of the virus.

This also reinforced the view that although it is clear that concerted efforts have been made to move people on from hotels and other forms of emergency accommodation into settled accommodation the statistics need to be viewed with some caution. All our most recent interviewees noted that people continue to move in and out of emergency accommodation, fail to sustain tenancies or are evicted so move back onto the streets or into emergency accommodation or are moved on from emergency accommodation but not into settled accommodation. This fluidity of movement is reinforced by the insufficiency of suitable affordable housing across London, suggesting that for London (and probably some other large urban centres) successful move on rates may be very different to those across the country more generally.

In addition, there were real concerns about a focus on short-term solutions without longer term plans, the consequence of which meant that people were being held in emergency accommodation, frequently without adequate support services, and because the onward routes into supported housing pathways are 'silted up' no immediate chance of progression. Amongst this group it is clear that there are still significant numbers of people with no recourse to public funds, estimated to account for around 40% of those remaining in the pan-London provision. Many have very complex immigration positions and whilst there have been attempts to provide a form of immigration triage for those accommodated there are insufficient resources to provide the legal services necessary, so progress is slow. Without access to housing benefits people are unable to move on to more stable accommodation and with employment opportunities very limited during lockdown they are unable to access jobs to support themselves, resulting in a stagnant situation.

This view was echoed by a NAO report '*Investigation into the housing of rough sleepers during the COVID-19 pandemic*' published on 14 January 2021 which noted that '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 rented sector. This was a particular issue in London where, by September around 2000 people (or around half of the 4,000 in total) who remained in hotels and other emergency accommodation were ineligible for benefits.' Furthermore, interviewees argued that whilst there is no clear direction from central government on how to move forward there is a feeling that the 'ground is constantly shifting' and no obvious resolution is in sight.

There was also felt to be a lack of clarity from government regarding the continuing use of hotels after March this year, resulting in a suggestion that some of the night shelter beds which would normally close at the end of March, may stay open into May or possibly June before closing for the summer months. This view was reinforced by one of the local authorities which argued that some of the church groups which had previously run night shelters had approached the council making clear they were keen to open up again when possible.

Whilst the first round of interviews had raised concerns across the board that funding to cover the range of additional responsibilities might not be forthcoming, the more recent interviews suggested that though there were still funding gaps, more had been provided than had been expected. Notably, though one respondent argued that clearer guidance from MHCLG to local authority finance departments would be welcomed as additional funding had been tied to general COVID-19 related costs and not hypothecated to specific services such as homelessness. There appears to be a collective feeling that people and organisations have by and large pulled together, have worked incredibly hard and, given the circumstances, have achieved significant results. Whilst many challenges remain, the impression was of a collective drawing in of breath before addressing the next major challenge expected to arise later this year as the volume of rent arrears becomes apparent, evictions resume, the furlough scheme comes to an end and unemployment rises. Discretionary Housing Payments are already in place as part of their prevention of homelessness powers to allow local authorities to help households with rent arrears if they make themselves known to the authority. If, as anticipated, large numbers of additional households present with arrears accrued during the pandemic, there are demands to government to consider further funding for the scheme to prevent adding to the growing number of homeless households.

To date, illegal evictions do not seem to have been a major issue and although family breakdown and cases of domestic violence have both increased, the concern focuses on the position once evictions are allowed to resume and the backlog together with new cases start to move through the courts. Local authorities are already seeing more people approaching them but do not expect the main impact to be felt until around August. They would like more clarity from the courts on timing but are currently not receiving this. In addition, there is uncertainty as to what the reaction of landlords will be, with evidence from some surveys suggesting that a proportion are planning to evict and then leave the sector which has become far less economically attractive to them.

Even without this possibility, if large numbers of families present because of significant rent arrears, eviction or unemployment, the existing problems of affordability will become acute. In May 2020 the government announced it was bringing forward £161 million to support the accelerated delivery of 3,300 units designed for rough sleepers by March 2021 through its Next Steps Accommodation Programme. This should help to ease the additional pressure on temporary accommodation from rough sleepers, but at the end of 2020 a report by Shelter estimated that across the country there were 253,000 homeless people already living in temporary accommodation (Pennington and Rich 2020). This represents the highest number of people in temporary accommodation for 14 years and for London, the report estimates that 1 in every 52 people living in the capital is already housed in temporary accommodation. Inevitably temporary accommodation is generally located in the most deprived parts of the boroughs which has a knock-on effect on young people both in terms of their school attainment and their vulnerability to being sucked into gang activity. And although the focus is on families because that is where the statutory duty lies, local authorities are also concerned about the numbers of young people who have previously managed to get by working in hospitality, entertainment or the arts etc but who have been furloughed and are very uncertain about the future. Although authorities may not have a statutory duty to help, they anticipate many will present anyway creating a further challenge to staff resources and resilience. There was a general level of concern that if there is an upsurge in demand for temporary accommodation following the eventual lifting of the ban on evictions alongside rising levels of unemployment, the volume of contacts will exceed their staff's ability to deliver.

2.10 What we have learnt

The *Everyone In* policy has proved to be a successful response to the public health emergency generated by the pandemic providing secure accommodation for large numbers of former rough sleepers at short notice. However, across London moving people out of the hotels into settled accommodation continues to be problematic. Additional demand for accommodation impacts on affordability within the PRS, but for many former rough sleepers their needs and lifestyles are better suited to supported housing. Even allowing for the current lack of onward progression within the system, there is a need for more supported housing and the staff to maintain it, if the government's aim to minimise rough sleeping is to be achieved.

In addition, amongst those still living in the hotels, it is clear that a significant proportion (currently estimated to be somewhere between one and two thousand in London) have no recourse to public funds making their routes out of emergency accommodation more complex. Louise Casey, amongst others, has called for an amnesty for this group, to allow people to move on and the situation to be resolved, but not all support this approach.

During the pandemic it was inevitable that the needs of rough sleepers dominated, partly because of the public health issues but also because the ban of evictions and lack of move on options led to a silting up of the system with households remaining far longer in existing sub-optimal situations. However, as the ban on evictions is lifted and rates of unemployment rise, local authorities anticipate a surge in the number of households unable to afford to pay rents and facing homelessness. Taken together with prevention work with young singles facing uncertain futures, local authorities face a rapid reorientation and a far greater demand for affordable accommodation than they have available to them.

London's local authorities are exploring ways of expanding affordable options such as modular housing and opportunities to acquire properties where landlords wish to sell up or the market for short lets has collapsed, in order to help households to move on through the system, but such proposals require both time and funding. What is really needed now is a medium-term strategy to plan for the changing needs of households impacted by the pandemic with funding tailored to the strategy rather than being delivered piecemeal. Longer term, the need for far more genuinely affordable housing to be provided across London needs to be addressed.

2.11 Conclusions

The interviews we carried out and the resulting narrative provided snapshots in time on a process which has unfortunately continued for far longer than everyone had hoped. Nevertheless, the *Everyone In* policy is generally considered to have been a significant achievement in organisational terms, in rapidly accommodating rough sleepers in far greater numbers than expected and in keeping rates of infection and deaths low amongst this particularly vulnerable group.

- The government's *Everyone In* policy impacted on all of London's local authorities, but variations in the numbers of rough sleepers within a borough, the availability and suitability of accommodation, organisational structural differences between authorities and staff resources and expertise meant that while all faced a common problem, individual authority's experiences and responses varied.
- After the initial push at the end of March 2020 to accommodate all rough sleepers, a continuing flow of people onto the streets was evident over successive months. As a result, more people were accommodated than expected and of these a significant proportion were found to have no recourse to public funds.
- It also became apparent that the situation was more complex than anticipated with people moving in and out of emergency accommodation, failing to sustain tenancies, evicted back onto the streets or moving on from emergency accommodation but not into settled accommodation. This fluidity of movement is reinforced by the lack of suitable affordable housing across London, suggesting that for London both that the statistics need to be viewed with some caution and that successful move on rates may be very different to those across the country more generally.
- *Everyone In* was driven by public health concerns which generated more collaboration from the start between health agencies, local authority homelessness teams and other support services. The

homelessness charities have also extended their links not only with local authorities but also with other tiers of government. In addition, the GLA, MHCLG and to a lesser extent DWP and the Home Office have extended their roles and connections. Many of these changes have been seen as positive but there is clearly scope for further review and a redrawing of lines and responsibilities to achieve desired outcomes

- During this first year of the pandemic the accommodation and support needs of rough sleepers have dominated the homelessness agenda. The ban on evictions and the furlough scheme have protected ordinary households from the full economic impact of successive lockdowns. Whilst some types of accommodation, largely with shared facilities, were deemed non-COVID-19 secure necessitating some immediate movement, the usual continuous movement of households through the system has largely stopped and the system to an extent 'silted up'.
- Monitoring the numbers of people furloughed, changes in UC and business relief applications and levels of rent arrears has enabled local authorities to put in place prevention measures where possible, but there is now real concern about the projected growth in demand for accommodation from households facing homelessness once the ban on evictions is lifted and unemployment rises later this year.
- Many predict significant challenges in finding affordable accommodation in a system which has consistently struggled with availability and affordability in London.
- In this context several boroughs reflected on the disproportionate amount of money being spent on a relatively small number of rough sleepers compared to the amount available for the far larger numbers of other homeless people. As one borough noted, at the time of the introduction of the *Everyone In* initiative it had nearly 6,000 households already living in temporary accommodation putting a considerable strain on families but because they are not 'visible' it is hard to get any type of equivalent public or political support.

The focus now needs to be on developing strategies for:

- Rough sleepers: both addressing the needs of the remaining hotel residents and providing the right type of accommodation and support structures to stop the movement of people back onto the streets. This must involve better monitoring of how those placed in move-on accommodation are coping;
- Households coming forward to local authorities: to improve the supply of appropriate temporary accommodation and affordable settled accommodation to allow households to move through the system without necessarily moving out of London.
- At the same time funding needs to be reviewed and tailored to achieving the strategic goals set, rather than being made available in a piecemeal fashion.

References

Pennington, J. and Rich, H. (2020), *Homeless and forgotten: surviving lockdown in temporary accommodation*, Shelter, Accessed 27 April 2021, https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/report_homeless_and_forgotten_surviving_lockdown_in_temporary_accommodation

3 COVID-19 and the Private Rented Sector

By Christine Whitehead, Nancy Holman and Martina Rotolo

One of the most obvious concerns arising from the COVID-19 crisis was the fear that there would be mass evictions as people found themselves unable to pay their rent. The government addressed this with a series of measures.

From March 26th 2020 the Coronavirus Act required landlords to give three months' notice of their intention to seek possession to regain properties that were let on a tenancy agreement. This initially applied until 30 September 2020. However, from August 29th the extension period was increased to six months and this is now in place until May 31st 2021. These rules only legally apply to tenancies as opposed to licenses to occupy which relate mainly to lodgers. The government did however urge landlords of licensed accommodation to follow the same guidance. They also requested that landlords work with tenants who were facing hardship – eg by giving a rent holiday or accepting a lower, more affordable rent for a period. To support tenants further, all except the most egregious possession claims cases were suspended initially until June 24 and subsequently until August 29, 2020.

Landlords have continued to be required to provide a minimum of 6 months' notice to their tenants for most grounds (including section 21). Shorter notice periods could apply where there is more than 6 months' rent arrears or evidence of antisocial behaviour. Notices from before 29 August 2020 could still be valid depending on the notice type and when they were issued.

Eviction notices were also paused except in the most egregious cases and after September bailiffs were not allowed to proceed with any such eviction, first in local lockdown areas and then nationally. This has also been extended to May 31st 2021.

Social landlords were also required (from January 2020 ie before the pandemic to put in place a pre-action protocol during which time they must help the tenant to obtain any welfare benefits and otherwise to manage as effectively as possible. Once the pandemic was underway private landlords were urged to do the same.

Thus in the vast majority of cases over much of the last year eviction notices have either been held up or not been allowed to be issued and in the relatively small number of cases that have got through the courts the warrant has not been allowed to be executed.

Our research addressed these issues with respect to the private rented sector at two points in time: in the period before the extension at the end of August; and again over March and April this year. We looked particularly at the evidence on how rent arrears were evolving; what would happen were the suspensions to be lifted and what this might imply for evictions and homelessness in the future. Here we set out the results at each stage and draw conclusions about the current position.

3.1 The situation around August 2020

Around 4.5 million households in England rent privately (English Housing Survey, 2018/19) - accounting for around 20% of all households (27% in London). Forty per cent of private tenants are under 35 and 35% are single person households; 75% are in full time employment but have slightly below average incomes. This suggests that they were relatively likely to be hit by unemployment.

3.1.1 *How many of these might potentially at risk of eviction?*

Only those who have a current Assured Shorthold Tenancy (AST), and who are up to date with their rent or less than eight weeks in arrears, are secure. And this is only until the end of their contract, which is rarely more than a year. After this, the landlord can normally issue a Section 21 'no fault' eviction notice.

Although the government has promised to get rid of Section 21 no fault eviction has remained in place throughout of the pandemic. As a result, increasing numbers will have very limited security unless the landlord

positively ensures that the AST is renewed. Many landlords and agents will do so, but equally we have no evidence in how many do so automatically and how many let it slip. So it is likely that the proportion who are secure will decrease over time.

The second most usual reason why tenants might normally be subject to eviction is if they are more than 8 weeks in arrears. In these circumstances they may be issued with a Section 8 eviction notice – and these circumstances are likely to become more and more usual as people face unemployment, shorter hours or lower pay. Those on lower pay may be eligible for Universal Credit to help pay the rent – but large numbers of private tenants who have had reasonable income will be paying rents which are above the Local Housing Allowance threshold.

In both cases landlords must go to Court to give notice if they wish to repossess. The notice starts the legal process but the court must automatically agree if the relevant conditions are satisfied.

3.1.2 How many will actually be threatened with eviction?

That clearly depends not just on the tenant and whether they can pay the rent but on their nearly 2 million landlords. At the limit, landlord will probably base their decisions on how good a tenant they think they have, and how easy is it to find a better one. Given the economic environment, a good tenant is clearly worth keeping, even if there are some arrears – which might imply that the number of no fault eviction could be expected to be lower.

On the evidence from the National Residential Landlords Association's (NRLA) Autumn quarterly report suggested that 87% of tenants were paying in full and a further 7% were not in arrears as they have an agreed plan. Even so, nearly a quarter of landlords had lost income, including 9% who have lost money because of tenants leaving without notice – which can be very costly. Shelter's evidence, based on a survey at the end of June 2020 (Shelter 2020) suggested that 5% of tenants were in arrears, twice the proportion at the same time in 2019.

So far the evidence suggested that there were perhaps double the number of people who might be in a position to be given notice of eviction as compared to mid-2019, once such notices could legally be issued. It was this that raised the fear that there would be a significant spike in evictions as soon as the system returned to normal. Our analysis suggested this would be unlikely:

First, under the pandemic rules, landlords would have had to wait six months before issuing an eviction notice. So only the 6,000 or so pre-lockdown cases, the few tenants who received eviction notices issued from lockdown to September 25th, and those with particularly high arrears or other egregious behaviour were at risk of legal eviction before April (now June) 2021.

Secondly, the Courts were already in a mess and putting off hearings of the small numbers of cases coming forward for months – some into 2023 – so evictions, even when the courts are technically back to normal, will undoubtedly will be further postponed. The eviction process would inherently be a long lasting slow burn.

3.2 Following on from the August extension

A YouGov survey (2020) in August suggested that the proportion of private tenants behind with their rent had risen to around 6% – half as a result of COVID-19. Importantly, evidence from the Resolution Foundation (Judge and Pacitti 2020) also suggested that unemployment among tenants has similarly doubled over roughly the same period. We used these figures as a starting point to give some idea of what might happen over the following year.

The central macro-economic forecast, then suggested that over the next year unemployment, which was at 4.1% in July 2020, could be 50% higher in a year's time, having been considerably higher in between. The worst scenario was 8.6%, i.e. more than double. At the time it was thought that this had become a more likely outcome because of continuing lockdowns. If we can assume that the growth in arrears, starting from 6% in August 2020 is closely correlated with, if not always caused by, unemployment, this would imply that by mid to late 2021

arrears would be between 12.6% and 15.6% of all tenants i.e. between 560,000 and 700,000 private tenants. The proportion of Londoners affected would be likely to be particularly high.

3.2.1 How many evictions?

The answer, based on past behaviour, is almost certainly that most will not be formally evicted. To get at some sort of estimate we can use evidence from the English Housing Survey (MHCLG 2018) which suggests that landlords only serve notice on about 10-15% of those who are in arrears at some time over the year. (Note that the number who experience arrears in a year has been roughly double the number in arrears at any point in time). In part this is because, in normal times, large numbers of private tenants would move on rather than build up debt, and many more would find the money to clear off the arrears.

Taking the 10% figure because tenants will have had a long while to make adjustments before a notice can be issued, would imply around 112,000 – 140,000 such notices. But, of those issued, only around 75% in the past actually lead to orders and perhaps around a half of these orders are executed. On this basis, IF the courts can cope, the numbers who are formally evicted might be between 42,000 to 52,500 – around 2.5 to 3 times the numbers of private tenants formally evicted in the period before COVID-19.

3.2.2 How will those in arrears but not formally evicted be expected to cope?

The options for tenants who lose income or become unemployed and cannot pay their rent are:

- (i) to remain and negotiate an arrangement with the landlord (which is great – especially if the tenant gets another job – but cannot go on for ever) or borrow eg from their family;
- (ii) to find alternative, presumably cheaper or more crowded, rental accommodation;
- (iii) to go back to Mum and Dad (especially because many of those who will lose jobs are relatively young). In the early stages of the pandemic the evidence showed that the majority of those under 35 moved back home - while in the USA the latest figures suggest over 50% of those under thirty are now living with parents; or
- (iv) to approach the local authority for support in finding accommodation.

3.2.3 What proportion will end up homeless?

In July 2020 Generation Rent, using a simple ratio approach, suggested that some 45,000 tenants might come forward in need of temporary accommodation, assuming arrears were running at around 13%. This is roughly 3 times the number accommodated in 2019 as a result of losing a private tenancy. Our more macro-economy based estimates were very similar

We added that this was likely to be a maximum because as the crisis continues, the relationship between arrears and acceptances is likely to change over time. Importantly, the very long notice period required and the near certainty of court delays makes it much more likely that tenants will find some other solution, however unsatisfactory. Secondly most non-family households, while they make up the majority (55% plus) of those coming forward for local authority assistance, will receive advice rather than accommodation.

So as we entered the second lockdown the fundamentals of the situation facing landlords and tenants was fundamentally, except for those eligible for significant Universal Credit which paid their rent at least in part, on their own. Personal circumstances might change for better or worse was just kicking the problem into the long grass.

3.3 April 2021 – A very long haul to normality?

Six or so months later the situation has not changed, although perhaps those six months has shown that the vast majority of landlords and tenants have simply buckled down and coped.

Then on March 10th 2021 the government again extended the requirement that landlords give six months' notice of the intention to evict and similarly extended the general ban on bailiff enforced evictions - but this time only for 2 months ie until May 31st. The assumption is that by the end of May they will provide a road map to normality.

Whilst this was a huge short-term relief for tenants in precarious situations, what normality means remains unclear. We therefore re-examined four issues:

1. How many people might be at risk of eviction?
2. Can the courts cope?
3. When will 'normality' return?
4. What changes need to be made?

3.3.1 *How many people are at risk?*

The most important source of risk remains the numbers of tenants in rent arrears and the numbers potentially subject to a Section 21 no fault eviction. More egregious problems have generally continued to be processed, although extremely slowly. In the fourth quarter of 2020 claims were running at around 25% of the same period in 2019. However, those for private tenants were running at around 50% with social landlords issuing very few notices. However only 6% of these had proceeded to orders and 1% to warrants – which then of course could not be implemented. This compares with 68%, 26% and 12% in the same quarter of 2019. It would therefore not be unreasonable to say that the courts were hardly toughing the problem.

But it is still worth asking how many might be at risk because of rent arrears. In the latest reports from Resolution Foundation (Judge 2021) and the National Residential Landlords Association (NRLA 2021), there is a surprising amount of agreement about the numbers.

First, and consistent with past evidence, both agree that over 90% of private tenants have been paying their rent regularly and in full.

Second, the Resolution Foundation report suggested that around 6% of private tenants were in arrears in January – around twice the 'normal' proportion. This is very similar to the numbers found last October and may suggest a considerable amount of 'turnover' with some tenants able to pay off their arrears; others simply leaving their tenancy; and still others falling into debt.

The NRLA's *One Year Review* suggested a somewhat higher figure for private tenants (7%, based on a sector wide tenant survey) which would imply some 320,000 tenant households in arrears across England and Wales. Importantly, however, they also noted that over 10% of private tenants were now unemployed, probably the major reason for arrears.

Looking forward, predicted UK unemployment rates in late 2021 suggest a central estimate of 6.5% (1.5% higher than the 4th quarter of 2020) very similar to the expectations last September. Assuming – a strong assumption – that private tenants are twice as likely to be unemployed compared to the overall average (as implied by the NRLA figures) this could equate to a rate of 13% unemployment among tenants at the end of 2021. Making an even stronger assumption that rent arrears will move in a similar way suggests that 420,000 tenant households might be in arrears on the central unemployment estimate, rising to over half a million on the worst unemployment scenario of 8%.

However, as we noted last year, many tenants in arrears simply move on, perhaps back to Mum and Dad or to sofa surfing, or even leaving the country. The stability of some of the estimates suggests that onward movement must be continuing - but we know almost nothing about these dynamics. NRLA data shows that around 40% of landlords have issued new tenancies between December 2020 and February 2021 which suggests very significant mobility. Whatever, many will have left unpaid arrears. Already a third of NLRA members say they have lost more than 10% of their rental income.

For those still living with arrears, many will be piling up debt. The bigger the debt, the more likely that the tenant will have to move on, either voluntarily or as a result of formal eviction procedures – so it may be reasonable to assume that the net numbers may remain roughly stable – although the loss of rental income can be expected to increase.

The other likely source of evictions is through the use of Section 21 - the no fault eviction clause. Most Assured Shorthold Tenancies will have run out during the pandemic and landlords will therefore have had a choice whether to renew, presumably based in part on whether the tenant is paying the rent. NLRA data suggest that

only around 20% of landlords have issued new tenancies to existing tenants while over 30% have allowed ASTs to become periodic. – putting tenants at greater risk of eviction. Even if in some cases eviction notices have already been issued they cannot go to court for 6 months thereafter, and on the current evidence it will take many further months to obtain a court order.

3.3.2 Can the courts cope?

The answer has to be no. In mid-2020 private landlord claims were running at only about 15% of normal rates but it was taking three times as long even to get an order. Despite an increase in the final quarter of 2020, the re-activation and six months' notice requirements put in place last September mean that hardly any potential claims under either Section 21 or Section 8 will get to court until at least the second quarter and many may not even start the process through the courts until late in 2021. Courts are far from returning to normal. The latest figures for the last quarter of 2020, compared to the same quarter in 2019, showed that landlord possession actions in terms of claims (8,382), orders for possession (2,195), warrants (1,792) and repossessions (548) have decreased by 67%, 89%, 86% and 93% respectively. As a result, the time taken to get an order, let alone to reach repossession (42 weeks on average) is unlikely to decline, implying that most cases entering the system now will not be completed until well into 2022.

How many of those in rent arrears will actually go through the full court process? The courts are the last resort for both landlords and tenants. For landlords it means both continuing loss of rent and significant direct costs. On the other hand, most tenants will either find a way of paying back the arrears (e.g if they find another job), come to some other agreement with their landlord, or will voluntarily move on. On past experience, less than half of those in arrears actually get as far as a formal claim and maybe only a third of those subject to eviction processes actually reach formal repossession. The problem is that around twice as many tenants as normal are in arrears and that these arrears are likely to be rising, while the Courts are simply not in a position to process anything like the numbers they were coping with pre-pandemic.

In 2019 there were about 45,000 to 50,000 claims submitted by private landlords. The median time from submission to repossession was around 5 months but many took a lot longer (indeed the mean time was nearer 10 months). Based on our estimates of those likely to be in arrears at the end of 2021 at least double this number could potentially be subject to court proceedings during this year. But a doubling of the numbers will simply slow down proceedings. This could well mean that some landlords at the end of 2021 will have been waiting more than a year for possession and many more starting proceedings at the end of the six months' notice period will continue to wait for a lot longer.

The problems around eviction proceedings is of course only a small part of the much larger problems facing the courts. Notably delays in setting criminal trial dates in the county courts running into 2023 have led to grave concerns about the effectiveness of the justice system. Court resources are not all siloed so it is likely that the need to speed up criminal cases in county courts will put further pressure on those available to deal with civil issues. It is hard to see how the situation can be improved at least in the short run. Arguably therefore whether or not landlords start formal proceedings hardly matters, except for the months of insecurity, mental stress and hardship facing so many tenants and indeed landlords. These are very real costs both to the individuals concerned and the operation of the private rented sector into the future.

3.3.3 When will 'normality' return?

Up to now, the result of the policy has been that tenants who would otherwise have been evicted have been allowed to remain, all the while racking up debt. Nothing has been done to help landlords facing significant losses from arrears. Recommencing evictions will not alleviate this issue for many months and worryingly will place tenants in the position of having a poor credit record, damaging their future opportunities in more than just housing. Lower rental incomes could also lead to a significant restructuring of the private rental sector (NRLA data suggests over a third of landlords are thinking of reducing investment or leaving the market altogether), making the future even more uncertain.

Normality, even with respect to court proceedings, appears to be at least two years away and possibly more. Normality for tenants will fundamentally be their own responsibility – finding at least a similarly paid job; but

more often by finding lower cost accommodation – with family; sharing; or moving. For landlords, normality may imply forgiving rent arrears if the tenant has found a way of paying current and future rents.

Thankfully, for the vast majority of landlords and tenants, normality will return, but this is largely the result of goodwill, not policy with the worst cases merely kicked down the road.

3.3.4 *What changes need to be made?*

There are two ways to speed up the process:

- If social landlords who pre-pandemic brought the majority of the cases continue to delay starting eviction proceedings, more space would be left for private landlord cases. This will by no means solve the problem – but could reduce delays by more than a half once the system overall is back to normal.
- Putting a lot more resources into the courts. This obviously has potential but seems to be unlikely given the priority that must be given to the criminal system and the attitude of government to private landlords during the pandemic.

Fundamentally, with a stalled legal system everyone has been left to fend for themselves. Thankfully, for the vast majority of landlords and tenants, normality will return, but this is largely the result of good will rather than policy with the worst cases merely kicked down the road.

3.4 What do we recommend?

First, Section 21 evictions should be stopped immediately rather than waiting another year or more to implement the government's promise.

Second, court proceedings for egregious cases – including six months plus rent arrears, must be speeded up, ensuring a timelier processing of the basic legal framework.

Third, as promised by the government, a version of the pre-action protocol for social landlords for the private sector should be put in place for all notices of eviction issued from June 1st.

This would leave existing problems to be addressed, notably rent arrears of less than six months on May 31st. Many tenants in this position are young and often either part-time or self-employed, and have had little government help during the crisis. It is here the government must act providing low interest rate loans to tenants wishing to clear their arrears and able to prove that the money is going to pay off those arrears as of that date.

Into the future the case for maintaining the maximum LHA at 30% is overwhelming; the same applies to the £20 UC uplift which has clearly helped reduce indebtedness, especially in high cost areas such as London. The welfare cap also needs to be re-assessed in the light of high housing costs.

But many tenants with arrears will not be eligible for UC or it will not be enough to enable them to stay in their current home. The higher levels of discretionary housing payments have helped and should be maintained; but also people facing eviction should be advised to go to their local authority for help as soon as they receive notice. Far more can be done to prevent homelessness if people come forward as soon as the problem emerges.

Unfortunately, these solutions are at best partial. In a crisis of this magnitude, there are no easy answers. Even with a rapid transition back to normality (say by the end of next year), the long-term arrears and loss of credit-worthiness among tenants and loss of income and confidence for landlords will continue to scar both individuals and the private rented sector for years. Private renting accommodates one in five households and many have no other option. If we are to avoid catastrophic future problems, we must ensure that the private rented sector remains sustainable.

3.5 Conclusions

Spikes in evictions are highly unlikely. Rather there will be a very slow burn that will go on at least into 2023. Formal evictions, while potentially higher than in the past, are likely to be a small part of the story. The reasons for this are at least threefold: landlord behaviour, tenant behaviour and the capacity of the courts. And it is the dynamics of the situation which matter.

- First, it is obvious that in many cases landlords and tenants have found ways of coping – rent holidays; lower rents during crises, perhaps help from family, tenants finding another job etc etc.
- Second, if their circumstances do not improve, tenants are more likely to find somewhere cheaper to live – often, among younger people, going back to Mum and Dad or sharing in overcrowded and insecure conditions.
- But the longer tenants remain in accommodation where they can't pay the rent, the higher their future debts will be and the greater difficulties facing both tenant and landlord. That is the main reason why the situation is worse now than before the second lockdown - rent arrears are higher rather than more people are in arrears.
- From the point of view of landlords formal eviction processes are highly undesirable – they are costly and time consuming of themselves, but also if the tenant stays in the face of notice of eviction and the subsequent legal procedures they may well not pay the rent. Yes, of course, that means that court proceedings can technically be speeded up – but when they are anyway so protracted this may be little comfort.
- For larger landlords this may not be so important as it is important to remember that at least 9 out of 10 tenants are paying all their rent on time. For the small landlord it can be disaster.
- The increasingly important emerging crisis is how the courts are going to cope. Up till now most legal processes have been postponed – but this cannot go on for ever. All the evidence is that although numbers of case coming forward have started to rise, the capacity to process these claims has declined.
- The actuality is that the courts will not be able to process the increased and increasing numbers. The long-term arrears and loss of credit-worthiness among tenants, and loss of income and confidence for landlords, will continue to scar both individuals and the private rented sector for years.

References

- Judge, L. (2021), *Getting ahead on falling behind: Tackling the UK's building arrears crisis*, Resolution Foundation Briefing, Accessed 28 Apr. 2021, <https://www.resolutionfoundation.org/app/uploads/2021/02/Getting-ahead-on-falling-behind.pdf>
- Judge, L. and Pacitti C. (2020), *Coping with Housing Costs, Six Months on...* Resolution Foundation. Accessed 28 Apr. 2021. <https://www.resolutionfoundation.org/publications/coping-with-housing-costs-six-months-on/>
- MHCLG (2018), *English Housing Survey Social rented sector report, 2016-17*, Accessed 28 Apr. 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/820784/EHS_2016-17_SRS_Report.pdf
- NRLA (2021), *COVID-19-19 and the Rental Market-One Year on*. Accessed 28 Apr. 2021. <https://www.nrla.org.uk/research/deep-insight/covid-rental-market-one-year-on>
- Shelter (2020), *230,000 Renters at Risk of 'COVID-Eviction' When Government Ban Lifts*. Shelter England, Accessed 28 Apr. 2021, https://england.shelter.org.uk/media/press_release/230000_renters_at_risk_of_covid-eviction_when_government_ban_lifts
- YouGov (2020), *YouGov Survey Results*, Accessed 28 Apr. 2021, <https://docs.cdn.yougov.com/jit4pxr9kw/Renting%20survey%20results.pdf>.

4 The Everyone In initiative: the numbers

By Christine Whitehead and Martina Rotolo

4.1 The published statistics

Last January 2021, the National Audit Office (NAO) published a report highlighting key figures for England on homelessness and rough sleeping since the launch of the Everyone In campaign (*See table below*). In terms of people who received accommodation, NAO reported that in England 33,139 people were brought into accommodation in response to COVID-19 since November 2020 and 3300 people were still in emergency accommodation and hotels .

Table 1: Everyone In main figures from NAO Report

| | |
|---|--|
| 33,139 people brought into accommodation in response to COVID-19 | People brought into accommodation (including emergency accommodation, such as hotels, and more settled accommodation, such as in the private rental sector) since the end of November 2020, while in November 2019 only 4226 people were recorded as sleeping rough. |
| 3,300 people remaining in hotels | 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 moved to settled accommodation | People moved into more settled accommodation, as at end of November 2020 (this and the figure above sum to 33,139). |
| 16 recorded deaths among homelessness due to COVID-19 | Recorded deaths of homeless people linked to COVID-19 as at 26 June 2020 (latest official figures). |
| £170m expected local authorities' expenditure between 2020/2021 | Amount local authorities expected to spend in 2020-21 on additional cost pressures related to rough sleeping, as at October 2020. This amount will be needed to rehouse 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. |
| 3,300 housing units for rough sleepers' long-term accommodation | Number of housing units to provide long-term accommodation for rough sleepers, to be delivered by 31 March 2021 under. |

Source: National Audit Office (NAO 2021: 7)

Subsequently, the Housing, Communities and Local Government Select Committee in their sixth report of session published on March 31st 2021, highlighted that “around 37,430 people had been helped into some form of accommodation, with 26,167 moved on into more settled accommodation and 11,263 remaining in emergency accommodation, an increase from 9,809 in November 2020” (Housing Select Committee 2021 9).

In London, London Councils reported a total of 4197 rough sleepers at the end of March 2021. 3,759 have been accommodated in emergency accommodation and 438 are still sleeping rough. 4,352 people have been moved to into settled accommodation. Now councils have in place a move-on plan for 887 people (23.6%) of those in emergency accommodation². The figures also note that 146 will not need move-on accommodation. 1383 have no recourse to public funds (717 Non-EEA nationals) and 666 (EEA nationals who have not exercised their treaty rights). The NAO also estimated that those who had no recourse to public funds accounted for about 50% (about 2,000 people) of the total number of people staying under *Everyone In* in hotels and other emergency accommodation in London in September 2020 (NAO 2021: 15).

Additionally, councils during the last week of March 2021 had received about 1661 homeless approaches and in the same week about 415 households have been accommodated, 56 people were at risk or had experience domestic abuse and 76 rough sleepers were provided accommodation.

The Greater London Authority (GLA) provided around 2,504 accommodation units on a pan-London level as of April 19 2021, including supported housing and hostels. Over 1,000 people have been moved to long-term

² Data from London Councils Rough Sleeping Next Steps Dashboard for week 31/03/21, correct as of 1/04/21

secure accommodation on April 20 2021. 338 people were directly moved into their own accommodation (e.g. Clearing House, PRS with floating support etc). Finally, 904 are still in emergency accommodation (including SWEP - with 747 who are Non-UK Nationals)³.

4.2 Understanding the figures

4.2.1 Background

In November 2019 the one night count of those sleeping rough in England showed a total of rough sleepers identified 4,266 people of which 1,136 were in London. These figures were some 10% down on the peak across England in 2017. In London the peak was in 2018 but the fall was of similar proportions. There was general agreement that these single night counts were underestimates, especially with respect to women who generally kept off the streets. But the extent of that underestimation was unknown.

Two thirds of those sleeping rough were identified as UK nationals; 22 % as EU nationals; 5% as non-EU and 10% of unknown origin. In London the mix was rather different with 40% EU nationals against 30% of UK origin.

When the government ordered 'Everyone In' on March 26th it was recognised that these figures would only be the starting point, not only because the data were incomplete but also because there were unknown numbers of roofless individuals who were being accommodated in night shelters, supported and other shared accommodation which was COVID-19 unsafe. These individuals were also to be accommodated in hotels and other COVID-19-secure units. It was also recognised that this was a public health emergency so no-one was to be excluded because their immigration status included that they had no recourse to public funds.

4.2.2 How many have actually been helped?

In January, the government published detailed data on how many people had been helped by the Everyone In programme. It covered three categories by local authority:

- people who had been moved into settled or supported housing since the emergency began;
- people still in emergency accommodation;
- and people currently sleeping rough.

The National Audit Office's added the first two categories of people (e.g. those moved on to settled accommodation plus those still in emergency accommodation) equating this to the total number of people who had been helped by the programme.

This rather simple addition misses the dynamics of the situation in two distinct and opposite ways:

First, there has been churn in those in emergency accommodation with some individuals coming in and then voluntarily coming out at least once and perhaps also on multiple occasions. This means that the government is providing **gross** figures, not the number of individuals actually assisted.

Second, quite large numbers of those may have found their own solutions rather than been placed by local authorities in settled accommodation and these are excluded from the NAO figures.

Are these big numbers? There are no national statistics that can answer this question directly. However, evidence from a number of London authorities suggest very varying proportions (in part arising from very different policies about who was accommodated)- but also suggest that on average the numbers who have left voluntarily might be as high as a quarter— and of course some of these will have re-entered the system.

In some sense it does not matter what the overall scale of the problem and the assistance was – people were helped; people left; some made their own way; others came back to be helped again; still others have fallen through the cracks and may already have re-emerged on the streets.

³ Numbers provided by the Greater London Authority (GLA).

But there is then an issue given that we want to future policy on the lessons we have learned? As it stands, we cannot. We need to understand the dynamics of *Everyone In* including its relative costs and effectiveness in both the short and long term. Otherwise we risk rolling out policies with baked-in, unknown issues.

4.2.3 How many were sleeping on the streets?

Everyone In did two distinct things; it brought those who were living on the streets into emergency accommodation and it moved people who were living in unsuitable accommodation into COVID-19 secure housing. Many of the second group were already in the system, being helped by charities and other housing providers in night shelters, hostels and other shared accommodation. Both of these groups clearly needed to be moved into housing that was COVID-19 secure. The problem arises that the second group were already in the system, meaning that their other needs (drug treatment, social and mental health care etc) were being addressed. For the first group who were equally needy this was not the case. Being unable to separate these two groups therefore results in both an overestimate of the numbers immediately affected by street homelessness and perhaps some misunderstanding of what is required of housing policy into the future. Looking merely at the overall numbers does little to solve the problems of homelessness in the long term and reflects a mechanistic view of what it means to experience being roofless.

A second issue in understanding the numbers can be seen in the reporting of those who were helped. After the March 26th deadline to move people off the streets there was a report issued at the end of April noting that some 5,400 people, or roughly 90% of those sleeping rough. However, by November the government figures had risen exponentially, with 33,000 plus, which accounted only for those who were still in emergency accommodation or had been moved on to secure accommodation – more than six times the original number.

Again, who is counted when is a part of the issue. There is evidence from London that the numbers of people sleeping rough for the first time increased very considerably during the first lockdown, but also that there are large numbers of people who sleep rough intermittently (Tunstall 2021). This reinforces the suggestion that some people may have been in and out of the system a number of times. But given the massive gap between those taken in in the first few weeks and those who have entered the system overall there must be a large number of people who have slept rough for the first time during the pandemic.

What drove people into first time rough sleeping? The core reasons appear to be two-fold: those who are thrown out from lodgings or sofa surfing (there is relatively little evidence of large scale illegal eviction) and those who lost their jobs because of the pandemic and cannot afford their accommodation. These clearly overlap. But, remembering that single people who approach the local authority for help will mainly only get advice, there may also be some, who facing very difficult housing conditions housing took the rough sleeping route to get a possible offer of settled accommodation in the longer term.

None of this is to deny that those who were accommodated didn't need that housing; but it is to say that many of the people coming forward for the first time during the pandemic will have been very different needs from those being housed at the beginning – and in particular can be expected to need less continuing support once that problem had been addressed. Again this may reflect a mechanistic misunderstanding of homelessness and its drivers.

Even so it is important to note that by no means all single people who faced housing problems went the rough sleeping route. Comparable numbers went directly to local authority homelessness services and were either given prevention support and advice or were accommodated in temporary accommodation (which usually does not include other support services).

4.2.4 How many have been moved on successfully into settled accommodation

This looks like the simplest part of the story. Government figures for move-on into settled accommodation have been rising by around 1,000 per month so that by January 2021 some 26,000 were said to have moved on, leaving only some 11,000 still in emergency accommodation (a figure which itself reflects a short term increase arising from severe winter weather).

However, the definition of settled has also been clarified. Initially the figures first presented in November 2020 stated that settled included those who gained a private tenancy with six months or more security or had been

accommodated in social housing. This has now been correctly modified to include supported housing which may be either long or short term – and which may involve sharing. The relative proportions are unknown.

Again this is not to say that people are not getting what they need. But it is to say that any evaluation of costs and benefits should be able to follow through on the evidence of how many of these arrangements were actually sustained into the longer term.

4.3 Conclusions

The story of the *Everyone In* initiative is generally presented as a major success story by which large numbers of people were taken directly off the streets, they and others in unsafe accommodation were accommodated mainly in hotels and moved on to appropriate settled accommodation. But while for many, and many more than originally intended, benefitted enormously, the story is much more complex than appears from the public discussion. This makes it difficult to take lessons forward into more normal times.

Equally there has been little attempt to estimate the true costs to the public purse in part because all the emphasis has been on numbers of people helped – and these are by no means clear. Large scale funding appears to have been put in place mainly to provide accommodation rather than to address longer term support needs which may fall on other parts of government. Importantly, as yet there have been only limited attempts to track individuals once they have moved on to see whether people’s lives are improving into the longer term. In particular, it is almost certainly too early to test whether settled accommodation has actually proved to be settled. Yet, it is this, together with appropriate support, which will show whether the way chosen to address rough sleeping in the pandemic can be seen to be more effective than earlier, at the time apparently successful, attempts. What is needed is a very careful evaluation of the different elements of the scheme, taking account of the costs incurred, the benefits to each of the very diverse groups directly assisted, and the extent to which policy objectives have been both met and maintained. There is a lot that needs to be learned before we can truly draw lessons for future policy.

References

- Housing, Communities and Local Government Select Committee - House of Commons (2021), *Protecting the Homeless and the Private Rented Sector: MHCLG’s Response to Covid-19, HC 1329, Sixth Report of Session 2019–21*. Accessed 27 April 2021.
<https://publications.parliament.uk/pa/cm5801/cmselect/cmcomloc/1329/132902.htm>.
- MHCLG (2021a), *Homelessness Statistics: Collection*, GOV.UK,
<https://www.gov.uk/government/collections/homelessness-statistics>. Accessed 28 Apr. 2021.
- MHCLG (2021b), *Coronavirus (COVID-19) Emergency Accommodation Survey Data: January 2021*. GOV.UK,
<https://www.gov.uk/government/publications/coronavirus-covid-19-emergency-accommodation-survey-data-january-2021>. Accessed 28 Apr. 2021.
- NAO (2021), *Investigation into the Housing of Rough Sleepers during the COVID-19 Pandemic*. National Audit Office (NAO) Report. Accessed April 12, 2021. <https://www.nao.org.uk/report/the-housing-of-rough-sleepers-during-the-covid19-pandemic/>.
- Tunstall, R. (2021), *Rough Sleeping in London: Back to the Old Normal, Not Building Back Better*. New Policy Institute, <https://www.npi.org.uk/blog/housing-and-homelessness/rough-sleeping-london-back-old-normal-not-building-back-better/>. Accessed 28 Apr. 2021.

5 The Costs to London boroughs of accommodating rough sleepers

By Kath Scanlon

5.1 Introduction

This chapter presents results from a cost-estimation exercise carried out in late 2020 to identify the costs to London local authorities of housing rough sleepers under the ‘Everyone In’ policy. We set out what costs local authorities had to cover and over what period, and distinguish between those expenditures reimbursed or funded by central government and those that came from boroughs’ own resources.

The underlying data were collected in June and July 2020. On the basis of those data, we made projections for expenditure for the full financial year of 2021.

5.2 The ‘Everyone In’ policy and what it required

Rough sleeping is the most public and visible manifestation of homelessness, but in strictly legal terms most rough sleepers are not classified as ‘statutorily homeless’ and local authorities normally have no duty to accommodate them. There was, however, an existing pan-London GLA programme called ‘Life Off the Streets’, which included a No Second Night Out service and a clearing house to move people on from emergency accommodation. This programme had a budget of nearly £20m in 2019/20 and had taken some 5,500 people off the streets. Boroughs also received funding through the Rough Sleeper Initiative to provide some additional outreach and support for rough sleepers, which amounted to £28.5m in 2020/21.

The situation changed dramatically at the start of the pandemic. Announced on 26 March 2020, the ‘Everyone In’ policy, which replaced No Second Night Out, looked to bring into safe accommodation all those sleeping rough, or in shared sleeping facilities such as shelters. Based on an April snapshot, MHCLG reckoned that 90% of individuals identified by English local authorities as rough sleepers or in ‘shared sleeping sites’ – a total of around 5,400 people – had been accommodated. In London the number was 3,600, of whom 1,200 were accommodated in GLA-procured hotels and 2,400 in borough sponsored accommodation.

This London figure for the number of people in emergency accommodation had risen to 4,450 by May 14th. By October 15th the number had fallen to 3,497 – with a further 2,968 people having been secured settled – so the issues move-on accommodation since March by a borough or the GLA. At the end of March 2021 3759 people were still in emergency accommodation although 4352 had been moved on into settled accommodation – making it clear that there are continuing cost implications. The figures for London come mainly from London Councils.

5.3 Why the cost-estimation exercise was carried out

Local authorities have a detailed record-keeping system⁴ for expenditure on homeless households, but as rough sleepers are not considered ‘homeless’ in the statutory sense the data are unlikely to be collected in a comparable format. London Councils therefore collected this information to provide an evidence base for understanding how the ‘Everyone In’ policy affects local government expenditure in London.

5.4 How the numbers were collected

London Councils is a membership organisation that represents the interests of all 33 local authorities in London (32 boroughs plus the City of London). Together with the London Housing Directors Group, London Councils collected the information using a questionnaire in the form of an Excel spreadsheet, which was circulated to all member authorities and to the GLA. The questionnaire format was developed by officers from the boroughs of

⁴ H-CLIC, or Homelessness Case Level Information Classification

Camden and Hackney and reflects the internal financial and recordkeeping procedures of those councils. Not all boroughs use the same procedures, which has resulted in some inconsistencies in the data (discussed below). The questionnaire was circulated in mid-June 2020, with returns being submitted into July and capturing boroughs' actual and anticipated spend at that point. It was completed by borough housing and/or finance officers. The survey was completed by 30 of the 34 organisations approached (33 local authorities and the GLA), which is a very high response rate given the pressures facing local authority housing departments and officers during the pandemic.⁵

5.5 Caseload

The survey showed that about 6700 individuals were given shelter in London from the start of the initiative to the end of June 2020 (Table 2). About 2400 were accommodated by inner London boroughs, 3000 by outer London boroughs and 1300 by the GLA.

Table 2: Responsibility for rough sleepers accommodated during 'Everyone In'

| | |
|-----------------------|-------|
| Inner London boroughs | 2,400 |
| Outer London boroughs | 3,000 |
| GLA | 1,300 |
| TOTAL | 6,700 |

Source: LSE London calculations based on London Councils/London Housing Directors Group/GLA data. Includes imputed figure for nonresponding boroughs. Rounded to the nearest hundred

Across boroughs there was a wide variation in the numbers accommodated, from a low of 26 to a high of 427. This variation can be explained partly by the extent to which boroughs use (or have within their areas) night shelters and other shared accommodation, the proportion of cases accommodated by the GLA, and boroughs' earlier policies on finding accommodation and responding to rough sleepers. These figures are gross – that is, they include *all* rough sleepers accommodated during this period. Some would have been accommodated even in normal circumstances, through the pan-London initiative, charities and mainstream borough programmes, had the pandemic not occurred.

Local authorities classify rough sleepers according to their eligibility for public funds, which in turn depends on their migration status. Many people without leave to remain indefinitely have the right to work but do not have access to benefits, notably Housing Benefit or Universal Credit; others are awaiting clarification of their immigration status or appealing against decisions made by the Home Office. About 1700 (a quarter) of the 6700 individuals accommodated were non-UK nationals who are not normally eligible for public assistance (categorised as 'No Recourse to Public Funds' or NRPF). Because it was a public health emergency, the Everyone In policy required local authorities to accommodate all rough sleepers including NRPF cases. Central government provided some money to local authorities to cover the costs but did not extend eligibility for Housing Benefit or Universal Credit to these households. Table 3 categorises the individuals accommodated by their eligibility for public funds.

⁵ Four boroughs did not respond. According to separate, regularly collected data on caseloads, these boroughs housed about 12% of London's rough sleepers in June 2020. The caseload and expenditure figures reported here include imputed numbers for the four non-responding boroughs.

Table 3: London Rough sleepers accommodated April-June 2020, by eligibility for public funds

| <i>Public funding status</i> | | <i>Boroughs reported</i> | <i>imputed figures for nonresponding boroughs</i> | <i>GLA</i> | <i>TOTAL</i> |
|---------------------------------------|--|--------------------------|---|-------------|--------------|
| eligible for public funds | | 3600 | 400 | 900 | 4900 |
| No recourse to public funds (NRPF) | EEA national eligible for housing benefit ⁶ | 100 | 0 | 400 | 1800 |
| | EEA national not eligible for housing benefit | 600 | 100 | | |
| | Non-EEA national | 500 | 100 | | |
| TOTAL INDIVIDUALS ACCOMMODATED | | 4800 | 600 | 1300 | 6700 |

Source: LSE London calculations based on London Councils survey of boroughs, June 2020, and GLA data. Includes imputed figures for nonresponding boroughs; estimates rounded to the nearest hundred

5.6 Net expenditure

London boroughs were asked to provide costs⁷ for three phases:

- Phase 1: the initial three-month expenditure period comprising April, May and June⁸, when councils were accommodating rough sleepers. The assumption made was that Phase 1 ended on 30 June for all local authorities.
- Phase 2: the transition period, during which this cohort of individuals would gradually move on from emergency accommodation (normally in hotels) to move-on temporary accommodation and then to settled accommodation. Each local authority was asked to indicate how long Phase 2 would last; the responses ranged from 3 to 24 months. This variation can be attributed to factors including caseload levels, the availability of suitable studio and one-bed accommodation locally, and how strict procurement policies are (for example, some boroughs limit procurement to properties within their own boundaries).
- Phase 3: costs incurred after clients were placed in settled accommodation. These costs were for ongoing support with for example drug and alcohol problems and would be incurred in some cases for long periods.

According to LSE London calculations, **boroughs** could be expected to incur costs net of Housing Benefit of **approximately £59.0 million in the first year⁹**, from April 2020 – March 2021. Some £19.5 million was spent during Phase 1; this is likely to be a good estimate as the survey was conducted in June, near the end of that period. In Phases 2 and 3, boroughs anticipated spending £39.5 million in the first year on moving this cohort into temporary accommodation, then eventually settled accommodation, and supporting them there. Separately, the **GLA** expected to spend some **£39.8 million** accommodating rough sleepers in the first year.

This establishes a **total anticipated cost across London of £98.8 million for the year 2020/21** as a result of the ‘Everyone In’ response to the March 2020 COVID-19-19 lockdown (Table 4). As we have already noted the flow of those needing assistance and placed in emergency accommodation is still continuing in April 2021.

⁶ Even though housing benefit is a type of public fund, EEA nationals eligible for housing benefit are classified—confusingly—as NRPF.

⁷ Net of Housing Benefit but not of any other grants or income.

⁸ The questionnaire did not capture expenditure data for the period from the announcement of lockdown until the end of March (8 days). Costs were incurred during this period but they would likely add a relatively small amount to the overall total.

⁹ Includes costs reported by boroughs and GLA for NRPF and non-NRPF cases, plus an uplift to borough costs to reflect estimated costs for four nonresponding boroughs. The uplift factor was 12%, based on the nonreporting boroughs’ proportion of rough sleeper caseloads in June 2020.

Table 4: Total anticipated cost across (£m)

| | | Non-NRPF | NRPF | OVERALL |
|-------------------|---------|--------------|--------------|--------------|
| Boroughs | Phase 1 | £14.7 | £4.8 | £19.5 |
| | Phase 2 | £23.8 | £7.5 | £39.5 |
| | Phase 3 | £8.2 | | |
| Subtotal boroughs | | £46.6 | £12.3 | £59.0 |
| GLA | | £19.0 | £20.8 | £39.8 |
| TOTALS | | £65.6 | £33.1 | £98.8 |

Source: LSE London calculations based on London Councils survey of boroughs, June 2020, and GLA data. Includes imputed figures for nonresponding boroughs.

In addition, there will be follow-on costs in subsequent years, mostly because former rough sleepers often have additional support needs. The boroughs estimate costs at **£31.3 million** in the next financial year, while the GLA expects to spend **£13.1 million** after the first year.

This brings the total cost to London local government of accommodating the roughly 6700 ‘Wave 1’ of rough sleepers to **£143.2 million**, suggesting a per-capita cost for the Wave 1 cohort of **£21,400** (Table 5).

Table 5: Total expected expenditure by London local government on Wave 1 (£ million)

| | 2020/21 | subsequent years | TOTAL |
|-------------------|--------------|------------------|----------------|
| Boroughs | £59.0 | £31.3 | £90.3 |
| GLA | £39.8 | £13.1 | £52.9 |
| TOTAL London | £98.8 | £44.4 | £143.2 |
| Per capita | 6,700 | Cases | £21,400 |

Source: LSE London calculations based on London Councils/London Housing Directors Group/GLA data. Includes imputed figures for nonresponding boroughs

The average annualised cost of temporary accommodation¹⁰ reported by the boroughs was £15,500 for each individual non-NRPF case (although note that not all individuals remain in TA for a full year). This is somewhat lower than the average costs of nightly paid accommodation in London that we calculated last year for MHCLG. However, the accommodation provided for rough sleepers was for single people, while pre-COVID-19 most such accommodation was procured for families. The cost of hotel extension accommodation was somewhat higher, at £19,900 per annum.

For NRPF cases, the estimated annual cost of move-on accommodation was lower, at £13,500. As noted before, practices differed across boroughs and not all classified expenditure the same way. For example, boroughs provided food to some former rough sleepers, and the reported cost of this ranged from £1 to £28 per person per night.

5.7 What we have learned

Local authorities receive government funding towards the costs of accommodating homeless households through longstanding grant arrangements, some of which is not ring-fenced for homelessness. London boroughs must top up expenditure with their own funds as the amount notionally allocated to homelessness does not cover the costs of temporary accommodation (as noted in our forthcoming report *The cost of temporary accommodation in England*, to be published by the MHCLG).

¹⁰ Simple unweighted average of borough monthly costs. Most but not all boroughs provided these figures.

Although rough sleepers are the visible face of homelessness, local authorities are not legally required to offer them shelter unless they come forward as homeless and meet relevant requirements. There is a different strand of government support for rough sleepers delivered through the GLA and borough Rough Sleeping Initiative programmes. This changed with the pandemic, when central government provided an additional ring-fenced grant to cover the costs of the *Everyone In* policy. This amounted to £94.72m in England, of which London local authorities (and the GLA) received £44.01m.¹¹

Although rough sleepers still remain outside the legal definition of homelessness, those accommodated in the initial March-June 2020 period and subsequently during the 2020-21 winter months, were where possible provided with move on accommodation either in the social sector, the private rented sector or supported accommodation and would therefore normally be eligible for Housing Benefit. Over time, local authorities are working to move them on into more suitable long-term accommodation. This is sensible and humane; there would rightly be an outcry if these individuals were sent back onto the street (although some have themselves decided to return). Of those who stay in the system, many have support needs that will entail continuing expenditure over a period of months or years and some at least of this accommodation will be subject to LHA limits. At the moment, however, there is no mechanism for local authorities automatically to recoup the considerable costs they incur, especially as LHA, from the point of view of the local authority, is limited to 90% of 2011 rents.

The original collection of data by London Councils on costs referred *only* to individuals accommodated during the first three months of the pandemic under the 'Everyone In' policy. That policy never formally ended although government assumed it did so at the end of June. Since then there has been a continuing flow of rough sleepers arriving on the street. If individuals needing shelter do not come forward to local authorities as homeless, or do so but qualify only for advice rather than accommodation, they will obtain support from other organisations or find their own solution—which is sometimes rough sleeping.

Informed sources say there may now be more rough sleepers than at the beginning of the pandemic, and that a higher proportion of these are NPRF. As a starting point, we would expect that the costs to local government in London of housing those newly arriving on the streets would probably be similar to those for the first cohort, at £21,400 per individual supported, although as noted in Chapters 2 and 4, many of those coming forward during the pandemic have very different needs from those accommodated at the beginning.

References

Scanlon, K and Whitehead, C. (2021), *London local government expenditure on 'Everyone In' An independent review*, LSE London, <https://blogsmedia.lse.ac.uk/blogs.dir/119/files/2020/11/Costs-of-Everyone-In-LSE-London.pdf>, Accessed 28 Apr. 2021.

¹¹ This includes £0.85m of funding provided in Coronavirus Emergency Support for Rough Sleepers announced March 2020 (23.6% of the national total) and £43.16m provided in Next Steps Accommodation Programme funding allocated in September 2020 (47.2% of national allocation, including £19m of funding for the GLA).

6 Conclusions & Recommendations: Homelessness in a time of COVID-19

By Christine Whitehead, Ann Edge, Nancy Holman and Martina Rotolo

Most of the discussion about homelessness has been concentrated on the *Everyone In* initiative which worked to bring rough sleepers off the streets and to rehouse large numbers of mainly single people living in accommodation with shared facilities deemed unsafe in a COVID-19 world.

However, very little has been said about the very much larger numbers of households who come forward to local authorities, are accepted as being in priority need and therefore requiring temporary accommodation. Two thirds of such temporary accommodation is provided by London authorities.

One reason for the lack of media interest in this much larger group is the assumption that as notice times had been extended and evictions suspended, the flow of households coming forward would be much reduced. However, in mid-pandemic (ie the 3rd quarter of 2020, the most recent data available), the numbers of households being accepted as eligible for temporary accommodation through the traditional pathways was still some 85% of the level in the equivalent quarter in 2019. The proportion of acceptances in London was roughly constant at just over 27% of the England total.

What has changed has been the mix of people being housed. The proportion of family households had dropped from 61% in the 3rd quarter 2019 to 51% in the same quarter 2020. This was more than offset by an increasing proportion of single people, mainly men. At the same time, the proportion of households who were defined as vulnerable increased from 30% to 39%. In London the proportion of families with children remained around 10% higher and dropped rather less - from 68% to 62%. The proportion who had vulnerabilities in London remained lower than for England as a whole – but rose from 27% to 34%.

The reasons for coming forward had also changed: around 33% were no longer able to live with family or friends as compared to 25% in the same quarter in 2019. Loss of a private rented sector tenancy had halved as a reason for coming forward – and these were almost all threatened rather than already implemented. Domestic violence as a reason for coming forward had increased but not greatly – from 9% to 11%. Rough sleeping had declined from 2.8 to 0.1%. So, the story suggests that the suspension of evictions was working well, as was the *Everyone In* initiative. The main difference was the large numbers of mainly younger men coming forward, often without legal rights, previously living with family and friends

6.1 What will happen next?

As we have noted above, after June 1st it is the government's intention to move towards normality by slowly reducing the notice period required to start formal eviction proceedings and to enable bailiffs to enforce evictions. This will be a very prolonged process, given how slowly the courts are now working and the very large numbers of potential evictions that have been put on hold. For legal and administrative reasons there will be no spike in evictions but rather a very long drawn out process over the next two or more years. Even so, increases in the numbers of people coming forward, either in the expectation of eviction or increasingly already evicted, will undoubtedly increase- and go on increasing. A particular issue will be the numbers of people who have Assured Shorthold Tenancies that have not been renewed who could be fairly immediately at risk of a court order.

Our estimates suggest that by the end of the year there could *in principle* be twice as many households in the private rented sector at risk of homelessness. Only a much faster improvement in the economy on the one hand and the likely continuing incapacities of the court system will mean that the process will actually be much slower. In 2019 there were some 30,000 eviction notices made, resulting in about 15,000 households being accepted as homeless. Our estimates of unemployment and homelessness now suggest that this figure might at least double, while many more will have been issued with eviction notices making them eligible for prevention

support from local authorities. Well over a quarter of the increases will be in London, where the likelihood of requiring temporary accommodation is very much higher than in the rest of the country.

6.2 What should be done? Our recommendations

6.2.1 Addressing evictions in the private rented sector

With the numbers of households at risk of eviction expected to rise during the second half of 2021, the need for a clear strategy and associated funding to address the twin impediments of availability and affordability is expected to move into much sharper focus.

Looking first at support for private tenants and those at risk of eviction our most important **policy** recommendations to government are:

- I. First, Section 21 evictions should be stopped immediately rather than waiting another year or more to implement the government's promise. By removing no fault evictions large proportions of private tenants would feel far more secure and as it is 'no fault' eviction which are being stopped landlords would not suffer. Indeed, both sides should benefit from a better understanding between landlord and tenant.
- II. Second, the maximum LHA should at least be kept at the thirtieth percentile. Linked to this the welfare cap needs to be reviewed in the light of these payments.
- III. Third, the £20 UC uplift should be maintained and the possibility of government paying rent to the landlord during the 5 week waiting period should be reviewed. These together would help large numbers of households both to afford basic essentials and to keep clear of debt.
- IV. Fourth, and perhaps most importantly there should be greater emphasis on prevention. The powers under the Homelessness Reduction Act, have proved a very effective mechanism for mediating between tenants and landlords and enabling tenancies to continue or to be replaced relatively cheaply. Making this policy work for the many more people in need of such assistance will mean more resources both for Discretionary Housing Payments – a successful aspect of policy introduced in 2018 - and more work at an early stage for local authorities. But it will undoubtedly be cost effective.
- V. Fifth, there is a need to address how to mitigate the impact on both tenants and landlord from the arrears that have built up over the last year – particularly rent arrears of less than six months on May 31st as these cannot be addressed rapidly through the legal system. Many tenants in this position are young and often either part-time or self-employed, and have had little government help during the crisis. Landlords have similarly had no support. It is here the government must act by providing low interest rate loans to tenants wishing to clear their arrears and able to prove that the money is going to pay off those arrears as of that date.

Our recommendations with respect to **practice** concentrate mainly on bringing the legal system back to some sort of normality so as to reduce the tensions faced by both tenants and landlords which have built up during the periods of suspension with respect to both notice of eviction and the legal processes towards actual eviction. They include:

- I. First, were social landlords, who pre-pandemic brought the majority of the cases, be prepared to continue to delay starting eviction proceedings, more space would be left for private landlord cases. This will by no means solve the problem – but could reduce private sector delays by as much as a half once the system overall is back to normal.
- II. Second, courts need to be in a position to reduce waiting times rather than extend them as is happening at the present time. This is particularly difficult because of the priority that must be given to criminal cases. Streamlining processes need to be developed. But more funding is also a necessity.
- III. Third, as part of this process, court proceedings for egregious cases – including six months plus rent arrears, must be speeded up. Ensuring more timely completion will increase belief in the system as well as provide better incentives to comply with tenancy agreements.

- IV. Fourth, as promised by the government, a version of the pre-action protocol for social landlords for the private sector should be put in place for all notices of eviction issued after May 31st.

6.2.2 Addressing the elimination of street homelessness and rough sleeping

Here most of our recommendations are about evaluating what has worked over the last year and what has not and more fundamentally to assess both the costs and benefits of particular initiatives. The Kerslake Commission has been set up to examine what might work best into the future but the evidence necessary to address these issues is not available, at least in the public domain.

There is of course a great deal of understanding of these numbers among those working in the area – many of whom we have interviewed. However, those working to secure and maintain accommodation and support for those who would otherwise have been rough sleeping or in insecure accommodation had no time for keeping anything but the simplest of records.

But this situation cannot continue as we return to some sort of normality. The numbers are simply numbers of people in particular situations. There is no longitudinal element at all as is reflected in the fact that we know nothing about who may have been in and out of the system or much about what is the reality of move-on to settled accommodation. There are concerns – eg about the suitability of support sometimes being provided and about how people are going to be able to pay the rent. But there is so far a lack of detailed understanding of how things are progressing.

Equally there is hardly any evidence on the costs involved, or indeed, at least in the public domain, of actual amounts of financing made available for different initiatives. Again money was not the highest priority in the crisis, but understanding where it went and what happened as a result is central to making decisions about the best ways forward. Our work for London Councils provides an example of what can be done.

In the context of rough sleeping, the focus now needs to be on developing strategies for addressing the needs of the remaining hotel residents and providing the right type of accommodation and support structures to stop the movement of people back onto the streets. This must involve better monitoring of how those placed in move-on accommodation are coping.

At the same time funding needs to be reviewed and tailored to achieving the strategic goals set, rather than being made available in a piecemeal fashion.

6.2.3 Integrating the system

A final requirement is almost certainly a review of how the two strands of prevention and main duty provision of temporary accommodation should operate together. These are currently often using the same resources (notably with respect to local authority staffing), but continue to be almost entirely separate with respect to funding and organisational structures. There is a clear tension between the funding available for a relatively small numbers of people at risk of sleeping rough and the numbers in temporary accommodation, especially in London.

Currently many more single people are coming through the traditional homelessness route – but also often need similar support to those in danger of rough sleeping. Equally large numbers of those who have continued to come through the *Everyone In* route have clearly not been on the streets for long periods and may need very different support as compared to people who have been long term street homeless. Equally those who were rehoused from shared and supported accommodation have different needs.

Overall, what is required is a very careful evaluation of the different elements of the *Everyone In* initiative, taking account of the costs incurred, the benefits to each of the very diverse range of groups directly assisted and the extent to which policy objectives have been both met and maintained. There is a lot that needs to be learned before we can truly draw lessons for future policy

Appendix 1: Policy changes in response to the pandemic

By Prof. Christine Whitehead and Martina Rotolo

Last year, through the Coronavirus Act 2020, the Government introduced legislation to delay when landlords can evict tenants. In particular:

- **Notice periods:** The Coronavirus Act 2020 imposed 3 months' notice to leave for tenancies in scope since March 26th, 2020. Then, since August 29th the minimum notice period has been extended to 6 months' – except for cases of anti-social behaviour, domestic violence and serious rent arrears or where the tenant has no right to rent. These notice periods were initially in force until 31 March 2021, but on 10 March 2021 the Government announced they would remain in place until 31 May 2021. Additionally, Section 21 notices served on assured shorthold tenants before 29 August 2020 will expire 6 months after service if possession proceedings have not been commenced. After 29 August 2020, if a landlord gives a tenant a valid Section 21, the notice will remain valid for an extended period: 10 months from the date it is given to the tenant; or 4 months from the date specified in the notice.
- **Evictions:** The Master of Rolls firstly suspended evictions for a period of 90 days since 27th March (Ministry of Justice 2020a). The ban on evictions has been extended first in June and then in August until 20th September. So, possession orders restarted on September 21st and will remain in force until 30 July 2021 with new requirements on claimants (e.g. the claimant must inform the court; must provide any relevant information about the defendant's circumstances; the court must fix a date either or after the issue and must suspend the standard period between the issue of a claim and hearing; the claimant must also produce the full arrears history in advance rather than at the hearing).
- **Bailiffs:** Since 10th September 2020, bailiffs were not to enforce evictions in local lockdown areas and then nationally, following the introduction of new national restrictions in England on 5 November 2020. This was followed by *The Public Health Regulations 2020* (Public Health England 2020) which came into force on 17 November 2020 to prevent the enforcement of repossession orders by bailiffs against residents in cases of trespassers; anti-social behaviour; death of an assured tenant; domestic violence; substantial rent arrears (e.g. 9 months' arrears) which pre-dated 23 March 2020. On 14 February 2021 the Government announced a 6-week extension to the ban until 31 March 2021. A further extension to 31 May 2021 was announced on 10 March.
- **Pre-action protocol:** The government announced that once the moratoria are lifted, they will be requiring landlords to abide by a revised version of the Pre-Action Protocol for Social Landlords (Ministry of Justice 2020b). The most recent version of *Guidance for Landlords and Tenants* (MHCLG 2021) makes no reference to a new protocol.
- **Financial Support for tenants:** On 20 March 2020, the Government announced a package of assistance for tenants which included an increase of the *Local Housing Allowance (LHA)* rates covering at least 30% of market rents. LHA rates have then been frozen in cash terms for the period between 2021 and 2022 (MHCLG 2020a). Tenants who are entitled to Housing Benefit or the housing element of Universal Credit and who face a shortfall in meeting their housing costs and require additional support, can also access *Discretionary Housing Payments (DHPs)*. In April 2020, MHCLG (2020a) provided £180m in Discretionary Housing Payment funding to Local Authorities. Discretionary Housing Payment funding were then reduced from £180 million in 2020/21 to £140 million in 2021/22. The Government confirmed that this funding could be used to reduce the 2020/21 council tax bills of working age people receiving Local Council Tax Support. Finally, the Government introduced increased the *Universal Credit* and *Working Tax Credit* by up to £1,040 over the year and by £20 per week on top of planned annual uprating.

No recourse to public funds: As the NRPF network reported (2020), in March following Everyone In policy and in response to the pandemic, the Government directed local authorities to temporarily suspend usual eligibility rules and provide accommodation to all rough sleepers, regardless of their immigration status. However, no changes have been made to benefit or housing eligibility criteria.. Although children with NRPF may be supported under the Children Act 1989 or Care Act 2014, many adults accommodated through 'Everyone in' will not qualify for such assistance. Courts have ruled that section 1 of the Localism Act 2011 cannot be used to provide accommodation when a person is

ineligible under the Housing Act 1996 and the Care Act 2014. In September 2020 MHCLG started working with the Home Office on internal plans to address rough sleeping and immigration issues (NRPF Network 2020). On April 2021, a new guidance has been issued by the Home Of Office outlining the circumstances under which non-UK nationals sleeping rough could have their permission to remain in the UK refused or cancelled (Home Office 2021).

References

- Home Office (2021), *Grounds for refusal – rough sleeping in the UK Version 1.0*, Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/978197/rough-sleeping-v1.0ext.pdf
- MHCLG (2021), *Guidance for Landlords and Tenants*. <https://www.gov.uk/government/publications/covid-19-and-renting-guidance-for-landlords-tenants-and-local-authorities/coronavirus-covid-19-guidance-for-landlords-and-tenants>. Accessed 12 Apr. 2021 .
- MHCLG (2020a), *Written evidence submitted by the Ministry of Housing, Communities and Local Government [IOC 308]*, <https://committees.parliament.uk/writtenevidence/4135/html/>, Accessed 12 Apr. 2021.
- MHCLG (2020b), *£3.2 million emergency support for rough sleepers during coronavirus outbreak*, Available at <https://www.gov.uk/government/news/3-2-million-emergency-support-for-rough-sleepers-during-coronavirus-outbreak>
- Ministry of Justice (2020a), *Practice Direction 51Z: Stay of Possession Proceedings, Coronavirus*. <https://www.justice.gov.uk/courts/procedure-rules/civil/rules/part51/practice-direction-51z-stay-of-possession-proceedings,-coronavirus>. Accessed 12 Apr. 2021.
- Ministry of Justice (2020b), *Pre-Action Protocol for Possession Claims by Social Landlords*. <https://www.justice.gov.uk/courts/procedure-rules/civil/protocol/pre-action-protocol-for-possession-claims-by-social-landlords>. Accessed 12 Apr. 2021.
- NRPF Network (2020), *Written evidence submitted by the NRPF Network [IOC 346]*, <https://committees.parliament.uk/writtenevidence/17568/pdf/>. Accessed 12 Apr. 2021.
- Public Health England (2020c), *The Public Health (Coronavirus) (Protection from Eviction and Taking Control of Goods) (England) Regulations 2020*. 2020 No. 1290 Statutory Instruments, <https://www.legislation.gov.uk/uksi/2020/1290/contents/made>. Accessed 12 Apr. 2021.
- Wilson, W. (2021), *Coronavirus: Support for landlords and tenants*, Briefing Paper: No. 08867, House of Commons Library. Available at: <https://commonslibrary.parliament.uk/research-briefings/cbp-8867/> <https://researchbriefings.files.parliament.uk/documents/CBP-8867/CBP-8867.pdf>

Appendix 2: Funding announced by MHCLG

By Fanny Blanc and Martina Rotolo

| Year | Month | Amount announced | Reason | Recipient |
|----------|---------------------------------|---|---------------------|--|
| 2020 | Early 2020 | £112m (8.2m used for emergency response) | Rough sleeping | Rough sleeping initiative |
| | May | £161m NAO: 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 £151 m had been allocated to 276 local authority schemes for new homes for rough sleepers | Rough Sleeping | 3,300 additional supported homes for those currently housed in emergency accommodation. Next Steps Accommodation Programme. To be used by the end of 20-21 financial year. |
| | March | £236m | Rough sleeping | Councils to provide up to 6,000 beds and 2,500 staff over the next year |
| | March | £144m | | Associated support services (NAO) |
| | March | £3.2m | Rough sleeping | Local authorities to reimburse the cost of providing temporary accommodation. |
| | March | £1.6bn | | Local Authorities |
| | April | £1.6bn | | Local Authorities |
| | March | £5bn | Covid Response fund | |
| | March | £500m | Hardship Fund | Local authorities can support economically vulnerable people and households |
| | May | £6m | Homelessness | Charitable organisations |
| | June | £23m | Substance abuse | Local Authorities |
| | July | £105m £91.5m allocated in Sept to 276 councils | Rough Sleeping | Next steps accommodation programme |
| | September | £180m | Vulnerable people | Councils via Discretionary Housing Payment Fund |
| | October | £10m | Rough sleeping | Cold Weather Payment for councils to help to keep rough sleepers safe this winter. |
| | October | £2m | Rough sleeping | Funding to support faith and community groups to help them get rough sleepers into accommodation. |
| | November | £15m | Rough sleeping | Protect Programme / support for council |
| November | 3bn to help tackle the pandemic | Spending Review 2020 for 2021/2022 | Councils | |
| November | £254m | Homelessness and Rough sleeping (Spending Review 2020 for 2021/2022) | | |
| 2021 | January | 10m | Rough sleeping | Extra COVID-19 Protection/ Councils |
| | February | 750m (2021/2022)) | Homelessness | 310 million will be targeted at areas with high numbers of homeless people, those at risk of homelessness, or those living in temporary accommodation. Extra £6.4 million funding for voluntary organisations to provide safe accommodation (announced in February). £212 million investment for 6000 new homes (announced in March) |
| | March | £212m | Rough Sleeping | Councils to provide long-term accommodation |
| | March | £165m | Vulnerable families | |

Funding: Key dates

February 2020: The Prime Minister announced an extra £236 million to help get people off the streets and appointed an independent adviser to lead an urgent review into the causes of rough sleeping. The Government had already committed £437 million to tackle homelessness and rough sleeping in 2020/21. This action is also part of a wider strategy to tackle all forms of homelessness. The Government invested £1.2 billion to tackle homelessness, and introduced ambitious new legislation, the Homelessness Reduction Act to ensure people at risk of becoming homeless get help more quickly, with councils receiving funding to support them in these duties (MHCLG 2020a).

March 2020: Communities Secretary Robert Jenrick announced £3.2 million emergency funding to help rough sleepers to self-isolate. The funding is available to all local authorities in England and reimburse them for the cost of providing accommodation and services to those sleeping on the streets to help them successfully self-isolate. It is in addition to the £492 million committed in 2020 to 2021 and represent a £124 million increase in funding from the previous year. This is part of £643 million funding announced budget to tackle homelessness and rough sleeping over the next four years (MHCLG 2020b).

May 2020: MHCLG announced £6 millions of emergency funding to provide relief for frontline homelessness charitable organisations (2020c). Homeless Link will be distributing the fund. MHCLG also announced 6,000 new supported homes via the Rough Sleeping Accommodation Project (RSAP) backed by £433 millions of Gov't funding (2020d). 3,300 homes were made available at the end of October backed by more than £150 million (MHCLG 2020e). With new homes approved across every region, people who sleep rough or are at risk of sleeping rough could be rehoused in long-term accommodation.

July 2020: As part of the Next Steps Accommodation Programme (MHCLG 2020f), a total of £105 million (MHCLG 2020g) was made available to ensure interim accommodation for those in need; to help people move into the private rented sector; or help people to reconnect with friends or family. In addition, first wave funding, totalling £161 million, was also made available to provide 3,300 additional supported homes for those currently housed in emergency accommodation. This is part of a total of £433 million to provide 6,000 long term, safe homes for those in need. The funding is for use during 2020/21 only.

September 2020: Applications started to be considered for a further £161 million fund intended to provide over 3,300 additional supported homes for those sleeping rough or currently housed in emergency accommodation (MHCLG 2020h). In September 2021, the Government announced that it was making £180m available for local authorities to support vulnerable renters negatively affected by Covid-19 (Gibson 2020). The Government decided that the Discretionary Housing Payment fund could be used to allow renters to apply for money and cover shortfalls in rent also caused by the Coronavirus pandemic.

October 2020: The Government announced £10 millions Cold Weather Payment for councils to help keep rough sleepers safe during the winter. Additional £2 million was provided to faith and community groups to get rough sleepers into accommodation. This is on top of over £700 million Government's expenditure to tackle homelessness and rough sleeping in 2020 (MHCLG 2020i).

November 2020: The Government announced a £10 billion package to build more affordable homes (MHCLG 2020j).

December 2020: MHCLG announced £750m funding to end rough sleeping in 2021 (2020k). An increase of £47 million on 2020, bringing total funding to tackle homelessness and rough sleeping to more than £750 million. £310 million were targeted at areas with high numbers of homeless people, those at risk of homelessness, or those living in temporary accommodation. The funding can be used to offer financial support for people to find a new home, to work with landlords to prevent evictions, or to provide temporary accommodation to families. The Government also announced £15 million 'Protect Programme' scheme for councils which required extra support during national restrictions and throughout winter to provide

accommodation for rough sleepers. MHCLG allocated £91.5 million to 274 councils in September to fund immediate support and interim accommodation for vulnerable people, as well as the £10 million Cold Weather Fund for councils to help to keep rough sleepers safe this winter (MHCLG 2020h).

February 2021: Mr Jenrick announced extra £6.4 million funding for voluntary organisations to provide safe accommodation and services – part of £750 million funding for rough sleeping in 2022 (MHCLG 2021a). This includes funding for COVID-19-safe emergency accommodation, longer term accommodation, a national helpline and training and support to professionals working to end homelessness. On February 2021, MHCLG announced that Councils across England were allocated £125 million funding to provide support for victims of domestic abuse and their children (2021b).

March 2021: MHCLG announced £212 million funding to provide 6000 new homes to support people sleeping rough to be rehoused in secure long-term accommodation. Councils are able to bid for a share of funding to provide long-term supported homes (MHCLG 2021c). MHCLG also introduced the Supporting Families programme backed by £164 million to help most vulnerable families (MHCLG 2021d).

References

- MHCLG (2020a). *Prime Minister Sets out New Measures to End Rough Sleeping*. Accessed April 12, 2021. <https://www.gov.uk/government/news/prime-minister-sets-out-new-measures-to-end-rough-sleeping>.
- MHCLG (2020b). *£3.2 Million Emergency Support for Rough Sleepers during Coronavirus Outbreak*. Accessed April 12, 2021. <https://www.gov.uk/government/news/3-2-million-emergency-support-for-rough-sleepers-during-coronavirus-outbreak>.
- MHCLG (2020c). *Coronavirus (COVID-19): Homelessness Response Fund*. Accessed April 12, 2021. <https://www.gov.uk/guidance/coronavirus-covid-19-homelessness-response-fund>.
- MHCLG (2020d). *6,000 New Supported Homes as Part of Landmark Commitment to End Rough Sleeping*. Accessed April 12, 2021. <https://www.gov.uk/government/news/6-000-new-supported-homes-as-part-of-landmark-commitment-to-end-rough-sleeping>.
- MHCLG (2020e). *Funding Allocated for 3,300 New Homes for Rough Sleepers*. Accessed April 12, 2021. <https://www.gov.uk/government/news/funding-allocated-for-3-300-new-homes-for-rough-sleepers>.
- MHCLG (2020f). *Jenrick Launches £266 Million Housing Fund for Vulnerable People*. Accessed April 12, 2021. <https://www.gov.uk/government/news/jenrick-launches-266-million-housing-fund-for-vulnerable-people>.
- MHCLG (2020g). *£105 Million to Keep Rough Sleepers Safe and off the Streets during Coronavirus Pandemic*. Accessed April 12, 2021. <https://www.gov.uk/government/news/105-million-to-keep-rough-sleepers-safe-and-off-the-streets-during-coronavirus-pandemic>.
- MHCLG (2020h). *274 Councils Set to Receive Housing Support for Vulnerable People*. Accessed April 12, 2021. <https://www.gov.uk/government/news/274-councils-set-to-receive-housing-support-for-vulnerable-people>.
- Gibson, Daniel. *£180m Made Available to Local Authorities for Renters*. *Public Sector Executive*, September 11, 2020. <https://www.publicsectorexecutive.com/articles/ps180m-made-available-local-authorities-renters>.
- MHCLG (2020i). *Rough Sleepers to Be Helped to Keep Safe This Winter*. Accessed April 12, 2021. <https://www.gov.uk/government/news/rough-sleepers-to-be-helped-to-keep-safe-this-winter>.
- MHCLG (2020j). *£10 Billion Package to Build More Homes and Level up Communities*. Accessed April 12, 2021. <https://www.gov.uk/government/news/10-billion-package-to-build-more-homes-and-level-up-communities>.
- MHCLG (2020k). *Government Pledges Further £310 Million to Tackle Homelessness*. Accessed April 12, 2021. <https://www.gov.uk/government/news/government-pledges-further-310-million-to-tackle-homelessness>.
- MHCLG (2021a). *Huge Progress Made as Rough Sleeping Figures at 6 Year Low*. Accessed April 12, 2021. <https://www.gov.uk/government/news/huge-progress-made-as-rough-sleeping-figures-at-6-year-low>.

- MHCLG (2021b). *£125 Million Allocated to Councils to Support Domestic Abuse Victims and Their Children*. Accessed 27 April 2021. <https://www.gov.uk/government/news/125-million-allocated-to-councils-to-support-domestic-abuse-victims-and-their-children>.
- MHCLG (2021c). *Thousands of Rough Sleepers to Be Supported with £212 Million Government Investment in Homes*. Accessed 27 April 2021. <https://www.gov.uk/government/news/thousands-of-rough-sleepers-to-be-supported-with-212-million-government-investment-in-homes>.
- MHCLG (2021d). *Next Phase of £165 Million Programme for Vulnerable Families Launched*. Accessed 27 April 2021. <https://www.gov.uk/government/news/next-phase-of-165-million-programme-for-vulnerable-families-launched>.

Appendix 3: Sub-regional data on rough sleepers in London

By Martina Rotolo

Information reported in the following appendix are collected by London Councils from the weekly accommodation survey sent to all London boroughs and the GLA. Sub-regional data are based on the STP footprints and not the London Council's Sub-regions. According to London sub-regional level data for the end of March 2021, the highest numbers of rough sleepers still in emergency accommodation¹² are concentrated in the North West (Barnet, Camden, Enfield, Haringey, Islington) with 684 out of 844 total rough sleepers; and in the North East (Barking and Dagenham, City of London, Hackney, Havering, Newham, Redbridge, Tower Hamlets, Waltham Forests) with 707 out of 800 total rough sleepers. Also, it is in the North West (1153 people) and South East (1099 people) that most people have moved into settled accommodation in total (See also Table 2 below).

Table 6: Rough Sleeping - London sub-regional overview

| Data for week to 31/03/21 | People Sleeping rough | People still in Emergency Accommodation | People in Emergency Accommodation with NRPF | People in Emergency Accommodation with NRPF (EEA) | People still Sleeping rough | People moved to Settled Accommodation |
|---|-----------------------|---|---|---|-----------------------------|---------------------------------------|
| NORTH CENTRAL | | | | | | |
| Barnet; Camden; Enld; Haringey; Islington | 651 | 595 | 95 | 122 | 56 | 678 |
| NORTH EAST | | | | | | |
| Barking and Dagenham; City of London; Hackney; Havering; Newham; Redbridge; Tower Hamlets; Waltham Forest | 800 | 707 | 146 | 147 | 93 | 577 |
| NORTH WEST | | | | | | |
| Brent; Ealing; Hammersmith and Fulham; Harrow; Hillingdon; Hounslow; Kensington and Chelsea; Westminster | 844 | 684 | 221 | 175 | 160 | 1153 |
| SOUTH EAST | | | | | | |
| Bexley; Bromley; Greenwich; Lambeth; Lewisham; Southwark | 388 | 326 | 75 | 21 | 62 | 1099 |
| SOUTH WEST | | | | | | |
| Croydon; Kingston upon Thames; Merton; Richmond upon Thames; Sutton; Wandsworth | 508 | 441 | 35 | 43 | 67 | 421 |
| LONDON BOROUGH TOTAL | 3187 | 2753 | 572 | 508 | 438 | 3928 |
| GLA | 1010 | 1006 | 145 | 158 | 0 | 424 |
| LONDON TOTAL | 4197 | 3759 | 717 | 666 | 438 | 4352 |

Source: Data from London Councils – London accommodation Data for week to 31/03/21, correct as of 1/04/21

¹² 'Emergency accommodation' covers all accommodation types that rough sleepers were placed into following the request on the 11th March. Including commercial hotels, B&Bs, temporary accommodation and other types of accommodation.