

Subject:	Next steps - Rough Sleeping and Accommodation during Covid 19 Pandemic and Recovery		
Date of Meeting:	17th March 2021 18 March 2021 – Policy & Resources Committee 25 March 2021 – Full Council		
Report of:	Executive Director of Housing, Neighbourhoods and Communities Relevant Executive Director		
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Ward(s) affected:	All		

FOR GENERAL RELEASE**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 At the outset of the pandemic and in line with advice from Public Health and Government guidance under the 'Everyone In' approach, the council acquired self-contained emergency accommodation in hotels to house: verified rough sleepers (those seen bedding down by our commissioned street out-reach services); clients from commissioned rough sleeping prevention services (including Somewhere Safe to Stay and No Second Night Out) who were in congregate accommodation which did not enable social distancing; and, those who had become homeless and were at risk of rough sleeping.
- 1.2 The council subsequently successfully bid for Government funding under the Next Steps Accommodation Programme (NSAP) to support the costs of accommodation and move on for those we had housed under the 'Everyone-In' initiative. The council received the largest funding allocation of any single local authority in the country. However, grant conditions limited support to those accommodated before 30 September 2020, while also supporting a continued accommodation offer for those subsequently verified as rough sleepers. Given the ongoing pandemic Housing Committee and Policy and Resources Committee agreed to the continuation of the council's accommodation offer for those people assessed as at risk of rough sleeping, not covered by NSAP provisions, presenting after 30th September 2020 during the on-going pandemic at a maximum cost of £0.986m.
- 1.3 Following consideration of NSAP progress and risks at earlier Housing Committees (18th November 2020 and 20 January 2021) and Policy & Resources Committee (3rd December 2020), this report provides a further update on key areas of action and issues arising up to 31st March 2021. This includes seeking the extension and acquisition approval for emergency hotel accommodation for those verified rough sleepers and those at risk of rough sleeping we continue to accommodate and support pending move on beyond 31 March 2021.

- 1.4 As the Government moves toward easing and removal of lockdown measures and ending of Covid-19 restrictions, this report also outlines a route map for the council to continue to support an accommodation offer for verified rough sleepers while ceasing the current offer of accommodation for those at risk of rough sleeping made for the duration of the pandemic by the ending of restrictions by June 21st. This will be aligned to the return of our usual customer facing homeless prevention and housing options services to support those who may be in insecure accommodation and / or facing homelessness.
- 1.5 We will also continue to work closely with Government on securing further funding and support for verified rough sleepers in the City through future NSAP, Rough Sleeper Initiative and other funding routes. In addition, we will continue to actively engage with Government and neighbouring authorities to better understand and seek to address homelessness pressures on south coast towns and cities.
- 1.6 The report also updates on: Cold Weather & Protect Funding; Severe Weather Emergency Protocol; Government Rough Sleeping Snapshot; and Homeless Bill of Rights.

2. RECOMMENDATIONS:

- 2.1 That Housing Committee note the progress to date.
- 2.2 That Housing Committee note the continued role of the Homeless Reduction Board in monitoring progress on meeting the conditions of NSAP funding and next steps.
- 2.3 That Housing Committee note the move on projections outlined in the report for those clients covered by Next Steps Accommodation Funding (Covid-1 in the report) and the continued emergency accommodation requirements for this cohort beyond 31st March 2021.
- 2.4 That Housing Committee note the move on projections for those assessed as at risk of rough sleeping who we have continued to accommodate (Covid-2 in the report) and the ongoing emergency accommodation requirements of those we have housed during the on-going pandemic into the new (2021-22) financial year.
- 2.5 That Housing Committee agree that by 21st June 2021, the accommodation offer to those assessed as at risk of rough sleeping made for the duration of the pandemic (Covid-2 in the report) is ended where no accommodation duty is owed by the council as outlined in paragraphs 3.11 – 3.13. This to be reviewed if there is a further increase in the pandemic.
- 2.6 That Housing committee note the low number of verified rough sleepers (para 3.23) and that the Council will continue to seek to offer accommodation to all verified rough sleepers to whom the duty is owed to consolidate this achievement
- 2.7 That Housing Committee agree Homeless Reduction Board oversee progress with the recovery of homelessness services, including face to face services, income recovery, move on and reconnections with a report on progress to the next Housing Committee

- 2.8 That Housing Committee recommend referral to Full Council the use of the Homeless Bill of Rights, as outlined in paragraph 3.24, as a standard against which the Council and its partners judge our policies and practices. Appendix 2.

That Housing Committee recommend to Policy & Resources committee:

- 2.9 That the Executive Director of Housing, Neighbourhoods & Communities be granted delegated authority to secure accommodation up to the 31st October 2021, by entering into contracts to extend existing arrangements or alternative arrangements where necessary to extend the provision of shorter-term/interim accommodation acquired in response to the Covid 19 pandemic, including a building to deliver the No Second Night Out service up to the beginning of October 2021
- 2.10 Agree to continue to support people in the accommodation secured as para 2.9 which includes security, support and food where necessary estimated to cost £2.900m to 1st October 2021.
- 2.11 Note that if Contain Outbreak Management Fund (COMF) funding is not available, this could create a service pressure of £2.043m.

That full Council be recommended to:

- 2.12 Agree to the use of the Homeless Bill of Rights, as outlined in paragraph 3.24, as a standard against which the Council and its partners judge our policies and practices. Appendix 2.

3. CONTEXT/ BACKGROUND INFORMATION

Next Steps Accommodation Programme

- 3.1 The NSAP Report, considered at Housing Committee on 18th November set out in detail the specifics relating to the amount of grant awarded and the conditions associated with that grant. The Ministry of Housing, Communities and Local Government (MHCLG) have been clear that the grant funding is ringfenced to meet the needs of people accommodated as at 30th September 2020 and for those who are subsequently verified as rough sleepers as set out in the report to Housing Committee on 18th November 2020.
- 3.2 As a reminder the NSAP bid proposal included funding for:
- Ensuring current provision to safeguard rough sleepers and those assessed as at risk of rough sleeping can continue for an appropriate length of time.
 - Reconnection where safe to do so.
 - Expanding Homeless Prevention and Resolution Officers (Brighton & Hove City Council).
 - Expanding Housing First coupled with expanded Home Purchase Policy.

- Expanding provision of supported move on accommodation and increasing Private Sector Leasing via partners to provide additional supported accommodation.
- Expanding use of private rented sector accommodation.
- Provision of specialist resource to work to secure the settled status of individuals who are EEA nationals without settled status.
- Access to employment.
- Return Home reconciliation work with young people where this is a safe option.

3.3 Whilst the Council received the largest single allocation of NSAP funding nationally not all the required work was funded. Although the funding was significant it amounted to 70% of the need identified. The resources needed to move on everyone by 31st March 2021 including availability of suitable accommodation is challenging. We anticipate being able to move on 220 of the 369 accommodated by 31st March 2021. The remainder of this group, which amount to around 149 people will continue to be prioritised for move on during the early part of 2021/22.

Policy and Resources Committee on 3rd December 2020, agreed to the continuation of the accommodation offer for those people assessed as at risk of rough sleeping who present after 30th September 2020 during the pandemic To distinguish between the projects relating to the group who were assisted before 30th September or who have slept rough (Covid 1) and those after that date which are funded separately, we have termed this project Covid 2.

As at 15th February 2021 there were 191 people accommodated under Covid 1 and 207 accommodated under Covid 2.

We are continuing to focus resources on improving homelessness prevention and move on but there are still challenges with identifying suitable move on options for everyone in Covid 1 by the 31st March 2021.

3.4 The Housing Committee's Homelessness Reduction Board meets regularly and oversees this work. There are several work streams being delivered as follows with the current position against each of them:

- Identify the move on requirements of those people accommodated as at 30th September 2020 and timelines to achieve 40% move on by 31st December 2020.
- Supply of accommodation to enable 40% to move on before 31st December 2020 and then remainder to move on for 31st March 2021. Move on will also need to be identified for rough sleepers accommodated after 30th September 2020.
- Ongoing accommodation and move on requirements for those assessed as at risk of rough sleeping accommodated under the Covid-2 cohort.
- Commissioning strategy to move away from congregate accommodation for rough sleepers.
- Monitor and identify the resources and support the actions needed to ensure that more people are prevented from becoming homeless.

The move on requirements and timelines for achieving the 40% move on by 31 December 2020 were achieved. As at 31st December 2020 197 people had moved on, this equates to just over 53%, 13% over target. Full details of the various moves are contained in the weekly data spreadsheet (as at week commencing 15th February 2021) contained in Appendix 2

3.5 We are continuing to identify supply to enable the remaining Covid 1 cohort to move on as follows:

3.6 **Private rented accommodation**

We are working with landlords and agents to increase supply and offer support to both landlord and tenant to ensure the accommodation is sustained. As at 21st February 2021, 52 people had been moved into suitable private rented accommodation. This includes piloting of HMOs.

3.7 **Housing First**

Home Purchase Policy is expanded to purchase an additional 30 properties to be used as Housing first. As at 7th February 2021 we have a pipeline of purchases in place as follows:

- 10 completed purchases of which 4 are ready to let, the remainder are under refurbishment/ repair.
- 20 properties have offers accepted and are progressing towards completion; (6 have completion dates and a couple may complete after the 31st March due to delays with the sellers' ongoing purchase).

To ensure the good progress continues with the Housing First home purchases the Housing Revenue Account Budget 2021/22 includes £1.200m direct revenue funding to fund 30% of a new £4.000m budget included in the capital programme with the remainder being funded from HRA borrowing. This will enable the purchase of up to 18x1 bed properties, ensuring the borrowing required can be repaid from the new rental income. There is the potential that further Government funding will also be made available to fund the delivery of Housing First properties, where this is the case this will continue to be optimised and used to deliver these properties.

There is revenue funding in Adult Social Care budgets for this service in place already for an additional 10 homes with the remaining 8 homes subject to additional resources being sought during the year.

3.8 **Supported accommodation**

We are obtaining an average of 3 units a week. Those ready to move on from supported accommodation are being assisted to do so to facilitate this pathway. Clarion/St Mungos acquired 20 units of supported accommodation, this forms part of the NSAP grant. These units are now mobilised.

3.9 **Social Housing**

During the pandemic, due to the restrictions on being able to undertake void work, there have been relatively few properties to let. We are anticipating this improving in the coming months. We are aware that some local authorities suspended their Allocation Policies and let properties directly to homeless households, due to the exceptional challenges of the pandemic. We adjusted the Allocation Plan to increase lets to households in temporary accommodation who

we owed a statutory rehousing duty to, in order to free up those units. However, as the overall number of properties becoming available was low, it has had minimal impact. The table below provides information on the lets to the different priority groups.

Group	2017-18	2018-19	2019-20	2020-21 April to end of Dec 2020	Total	Overall percentage across all years
Homeless	306 (42%)	285 (40%)	230 (40.5%)	101 (47%)	922	41%
Transfers	190 (26%)	168 (24%)	138 (24.5%)	37 (17%)	533	24%
Homeseekers	209 (28%)	177 (25%)	126 (22%)	41 (19%)	553	25%
Council's interest *	30 (4%)	72 (10%)	75 (13%)	37 (17%)	214	10%
Total	735	702	569	216	2222	

*This group is people nominated by Children's services and Adult Social Care, which also includes those for Housing First.

3.10 Referrals and Reconnections

A total of 15 reconnections have been achieved. There are challenges with statutory reconnections as we must ensure there is suitable accommodation for the person to be referred into and the receiving local authority require evidence that the person has a local connection with them. This can be difficult if people are reluctant to be reconnected. To improve performance on local connection, we are establishing a cross agency team, which will include Housing colleagues, located at First Base Day Centre. We are also having discussions with our advisors at MHCLG and are developing protocols with neighbouring authorities with respect to these cases. There are a potential 49 people who could be reconnected depending on establishing robust evidence to support a referral.

3.11 With regard to continuing to provide accommodation to those assessed as at risk of rough sleeping (which we have termed Covid 2), as of 15th February 2021 we were accommodating 207 people. We will focus resources on moving people accommodated under Covid 2 during the period of the pandemic in 2021/22.

3.12 This report recommends that, in line with proposed easing and ending of national Covid-19 restrictions and opening of the council's usual homeless prevention and housing options service, that Housing Committee agree that by 21st June 2021, the accommodation offer to those at risk of rough sleeping, the Covid- 2 cohort, made for the duration of the pandemic is ended where no accommodation duty is owed by the council. Neighbouring councils such as Adur/Worthing, Eastbourne/Lewes; Crawley, Chichester and Hastings have confirmed their offer of accommodation is restricted to verified rough sleepers only and for any others only in exceptional circumstances.

3.13 Our usual service for those who are at risk of rough sleeping where no accommodation duty is owed, includes action to prevent applicants from sleeping rough. In line with the Homeless Reduction Act 2017, Housing will assist applicants to retain or secure accommodation with a reasonable prospect that it will be available for occupation for at least 6 months. This assistance will last for a minimum period of 56 days and will include a personalised housing plan, taking account of the applicant's needs. Support will be provided to the applicant both directly and by engaging relevant specialist services.

3.14 Officers worked hard to reach our end of December target to move on Covid-1 clients. While this is a significant achievement, we must also acknowledge the considerable work ahead of us. Moving people on the scale necessary puts a pressure on resources both in terms of the accommodation needed initially and to move people into but also for the staffing to support such moves.

We are aiming to complete the move on for a further 50 of the remaining 191 people accommodated under Covid 1 by 31st March 2021. This will be challenging as the remaining group include a greater proportion of people with multiple and compound needs. In addition, we are still seeing new people being verified as rough sleepers who are being added to this group which totals 33 as of the 15th February 2021. In summary, we are anticipating approximately 149 people will need to be moved on after the 31st March, during the early part of 2021/22.

3.15 We are expanding the Housing First model to meet the needs for some of these people through our Home Purchase scheme. However, there will be additional people who also require more intensive help and support. We are collaborating with partners in making offers of accommodation; enabling moves and in supporting the sustainment of accommodation offered.

3.16 **Cold Weather & Protect Funding**

To assist with the move away from congregate accommodation, we successfully bid for grant for Cold Weather Funding, which enabled 12 units of accommodation to be available to verified rough sleepers from 21st December to 31st March 2021. We can invoice up to £0.140m for this service. This relieved pressure when the Severe Weather Emergency Protocol (SWEP) operates.

3.17 In addition we successfully bid for "Protect" funding jointly with Health partners; Mobilisation was delayed slightly due to the demands on the clinical staff, but this is now operational as follows:

- A Preventing Admissions Worker based at A&E to work with rough sleeping people.
- 4 of the 5-bed unit Step Down from hospital service operational to enable patients who are ready to be discharged but are of no fixed abode and require clinical support to be safely discharged.
- An expanded peripatetic Protect team to offer clinical support to medically vulnerable people in emergency accommodation and supported accommodation.

3.18 **Homeless Prevention**

Between 1st April 2020 and 31st December 2020, the council prevented 438 households from becoming homeless, For the previous full year 1st April 2019 to 31st March 2020 we prevented 791. Whilst numbers are projected to be lower than 19/20, conditions are more challenging. Evictions from private rented accommodation have been paused due to the Government moratorium on evictions, this has been extended until 31st March 2021.

Information from the Office for National Statistics shows an increase of people claiming benefits in Brighton and Hove rose from 5,880 in March 2020 to 8,120 as of 10th December 2021. Locally, affordability is one the biggest causes of private rented sector eviction.

The Housing Options service is preparing for post pandemic changes in service demand, especially in relation to private rented evictions leading to an increase in approaches from people at risk of homelessness. It is essential we are able to respond at the earliest stage. Preparation includes building on collaborative work such as co-location with the DWP to support people back into work, joint work with Brighton and Hove Independent Mediation Service to help with negotiation between landlords and tenants. In addition, we are communicating with landlords and agents who operate in the city requesting they contact us if they are considering eviction so that we can try and resolve matters to avoid homelessness. We will also continue to work with landlords to develop our Direct Lets scheme as an option to avoid homelessness.

We are exploring extending our commissioned mediation services to support individuals and families during this challenging time and to enable more people to leave home in a planned way, where it is safe to do so. This will build upon the mediation work currently funded through our Homeless Prevention Grant.

3.19 Overall increase in emergency accommodation

Taking our usual statutory temporary accommodation placements in addition to people we have accommodated under NSAP and Covid 2, our numbers in emergency accommodation has increased significantly from approximately 500 to 800.

Whilst our outreach teams made up of Welfare Officers and some of our Homeless Prevention Officers have been going out to see people in emergency short-term accommodation, this has only been possible where it is safe to do so. Returning to a safe office environment for face to face contact with customers will be a major step forward in resuming our usual service provision.

3.20 Out of Area Placements

We have accommodated around 300 people in emergency accommodation outside of the city. Whilst we are continuing to move a lot of people on, they have been replaced by others. We are exploring additional short-term accommodation options in the city including negotiating to acquire a large hotel for short term use. This will enable us to accommodate those people assessed as high priority for a move back to the city so they can more easily receive the support, including the help to move on that they may need.

We wish to actively engage with Government and neighbouring authorities to better understand and seek to address homelessness pressures on south coast towns and cities.

3.21 Funding

Aside from core funding, there are other main sources of grant as follows:

- a) Homelessness Prevention Grant – a combination of the previously called Flexible Homeless Support Grant and Homelessness Burdens Funding. These grants are awarded by MHCLG based on previous figures of homelessness and temporary accommodation. It is primarily to fund the management element of temporary accommodation that was removed from the housing benefit several years ago, and in addition to improve prevention and reduce down the need for temporary accommodation.
- b) Rough Sleepers Initiative (RSI) 4. This is bid for through submissions that aim to support people to move on from rough sleeping. For 2021/22 there is a new element for prevention and early intervention which is very welcome.
- c) Future rounds of Next Steps Accommodation Programme funding. MHCLG have just advised that new funding of £0.500m has been awarded to the council for the continuation of housing rough sleepers up to June 2021.

3.22 SWEP – Severe Weather Emergency Protocol

Although not part of Next Steps Accommodation Programme, there have been implications for how SWEP is delivered following Covid 19.

Due to the current pandemic, advice from Public Health England, local Public Health colleagues and the MHCLG, was that SWEP could not be delivered by use of congregate sleep space arrangements or by open access to a single hub.

In response we acquired 14 units of self-contained accommodation for SWEP. Referrals are made by the Street Outreach Service who carry out outreach shifts 7 days a week including bank holidays. If the 14 units are full, colleagues in Housing and St Mungo's No Second Night Out Service work together to ensure that everyone in need is offered safe accommodation during periods of severe weather.

Information on how to support people to access SWEP has been shared in local media, via social media and is on our website. All organisations working with homeless people have had this information shared with them through the Voluntary Community Sector and Operational Forums.

This winter, SWEP has operated in a way that has successfully enabled rough sleepers to move on to longer term accommodation once SWEP is no longer available rather than returning to the streets.

3.23 Government Rough Sleeping Snapshot

The Government's Rough Sleeping Snapshot in England: Autumn 2020. reported on 25.02.21 that Brighton and Hove had the third largest decrease

nationally and the highest decrease outside of London of people sleeping rough. This count was undertaken in November 2020, 27 people were reported to be sleeping rough in the city. This is compared to 88 in November 2019, a 69% decrease. The rough sleeper count undertaken on 28th January, a night when SWEP wasn't operating, suggests this has dropped further, with 9 people sleeping out.

3.24 Homeless Bill of Rights

As outlined in the Homelessness & Rough Sleeper Strategy agreed at Housing Committee on 17 June 2020, the values of the Strategy align to the aspirations within the Homeless Bill of Rights as amended for Brighton & Hove by Housing Rights Watch, FEANTSA and Just Fair.

The Homeless Bill of Rights should be viewed as a standard against which the Council and its partners judge our policies and practices. The progress of the aspirations contained in the Homeless Bill of Rights will be monitored by the Homeless Reduction Board.

This report proposes that Housing Committee recommend to Full Council the use of the Homeless Bill of Rights, as a standard against which the Council and its partners judge our policies and practices.

4 ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

4.1 None currently.

5 COMMUNITY ENGAGEMENT & CONSULTATION

5.1 None at this time but we will be seeking feedback from customer, partners and providers next year as part of a review of the service going forwards.

6. CONCLUSION

6.1 We met the target of moving on 40% of those accommodated under the NSAP provision by 31st December 2020 which was necessary to secure the withheld 30% of the awarded grant.

6.2 We are focusing on the remaining people accommodated under Covid 1 to move on as many people as possible by the end of March 2021, with the remainder during the first quarter of 2021/22.

6.3 We have made good progress reducing the numbers of verified rough sleepers and have dropped out of the 10 worst councils for rough sleeper numbers. We must seek to sustain our everyone in offer for rough sleepers and ensure no second night out efficiently assess and moves on all rough sleepers housed under this offer to consolidate this noteworthy achievement

6.4 We are making a high level of placements following the decision at Policy and Resources Committee in December 2020 to continue to provide accommodation to those assessed as at risk of rough sleeping during the pandemic. It will take much of 2021/22 to move those we have already housed under this provision This is because of the available capacity in the all sectors of the local housing

market. However, we propose to return to our normal service for this cohort of clients by 21 June 2021.

- 6.5 The pandemic has changed the landscape of homelessness and there are further changes anticipated as the full impact emerges and we see implications on loss of accommodation in different groups, particularly those who were previously employed. Future planning will continue to emphasise the prevention of homelessness through early intervention.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The net cost (after accounting for grant and assumed Housing Benefit income) of housing rough sleepers and those at risk of rough sleeping during the pandemic is forecast to be £4.116m for 2020/21 as included in the Targeted Budget Management (TBM) Month 9 report to P&R Committee.
- 7.2 As mentioned in this report the council has been unable to move on all of those accommodated as a result of the pandemic. The body of the report suggests that by 1st April 2021, there will be 149 'Covid 1' people and 207 'Covid 2' people remaining in temporary accommodation. Therefore, a total of 356 to continue to house in hotel. Hotel accommodation is expensive. On average one person costs an estimated £18,000 for a full year. Also, all residents in a hotel need to be moved on before a hotel is handed back and costs reduce.
- 7.3 The cost of this continued provision will depend on how quickly people can be moved on to more settled accommodation during 2021/22. Currently, although some are being moved on, overall numbers in hotels are not reducing. This is because of the continued flow of those at risk of rough sleeping being accommodated. The report recommends ending this provision after the duration of the pandemic on 21st June. The report suggests that hotels will therefore be needed until at least 1st October 2021. The cost of hotel accommodation for 356 people until 1st October is estimated to be £2.900m. The likelihood is that given the time it takes to move on all residents from one hotel, there will be no hand backs in this period. However, if a hotel was handed back earlier, costs would reduce by an average of £0.072 per month for a 50-bed hotel. Similarly, if hotels need to be kept for longer, costs will increase by £0.072m for each 50-bed hotel extended beyond this date. If all hotels were extended for a month, costs would increase by an estimated £0.500m.
- 7.4 Therefore, the council will need to ensure that homelessness prevention is a key priority to stem the flow of homelessness and ensure that the current numbers in temporary accommodation including hotels reduces as the pandemic comes to an end. If not, there is a risk that the use of these hotels may need to continue longer term. This will create a significant potential ongoing cost and add substantially to the 2022/23 budget gap which is already £11m.

Resources/Budget

Budget Council approved £0.650m for 'Ongoing use of emergency (hotel) accommodation for rough sleepers' during 2021/22. There is also further funding in the form of a newly announced grant of £0.500m from MHCLG to contribute

to additional emergency accommodation, support and move on costs during 2021/22. Total funding is therefore £1.150m for 2021/22. However, £0.293m has been earmarked for the extended lease for the 'No second night Out' venue.

- 7.5 The council has been granted £4.200m in Contain Outbreak Management Fund (COMF) grant. There is also potential to utilise this COMF grant to support these costs, however the detailed costs of supporting testing, Covid management and compliance, delivery support, etc. have not yet been finalised and are not fully understood at this time. If insufficient COMF grant is available to support these accommodation costs, this will cause a financial pressure in 2021/22 of £2.043m, assuming all are moved on after 6 months but substantially more if they are not.
- 7.6 It is therefore imperative that the use of hotel accommodation is minimised in 2021/22 by preventing homelessness and the flow into hotel accommodation and by maximising the opportunities for moving on those already there.

Finance Officer Consulted: Monica Brooks

Date 05/03/2021

Legal Implications:

- 7.7 According to the council's constitution, the " Endorsing, approving or otherwise committing the Council to any charter, alliance or pledge" is a full council function. The recommendation at 2.8 is consistent with the constitution's requirements. Otherwise, given that the actions outlined in the report are compatible with statutory and grant funding requirements, there are no legal implications that need to be drawn to Members' attention.

Lawyer Consulted: Liz Woodley Date: 05/03/2021

Equalities Implications:

- 7.8 An equalities impact assessment has been carried out

SUPPORTING DOCUMENTATION

Appendices:

Weekly data report
Homelessness Bill of Rights