

# East Kent Homelessness Prevention Strategy

2014-2019

## 1. Foreword

Canterbury, Dover, Shepway and Thanet Councils have a track record of working together to deliver improved services for the residents of East Kent.

The first joint homelessness strategy was adopted in 2008 and enabled a more collaborative approach between the councils and key stakeholders to tackling the problem of homelessness. Significant progress was subsequently made in a number of areas but we recognise that homelessness in East Kent remains a live issue and that we need to maintain our collective effort with regard to homelessness prevention.

The emphasis of the strategic approach has been on reducing homelessness and the Council's use of temporary accommodation, improving the quality of temporary accommodation and ensuring that people received the advice and support they need to achieve independence.

The title of this second joint strategy makes it clear that our focus isn't just on dealing with homelessness after the event, although we recognise the importance of this, but rather the need to further develop proactive intervention measures which prevent people from becoming homeless. We want this strategy to encourage a joint approach which shifts the emphasis away from a crisis response towards early intervention.

There is a vast amount of evidence to show the impact that homelessness has on both physical and mental health and wellbeing and therefore the significance of this strategy for the council's and their partners is heightened by recent national changes to the health and care systems and the council's role in the new health and wellbeing structures.

## 2. Introduction

Section 1 of the Homelessness Act 2002 requires local authorities to publish a Strategy based upon a review of homelessness in their area.

Households experiencing, or threatened with homelessness are often trapped in cycles of deprivation that impact on their health, emotional well-being and life chances. The effects on children within households experiencing or threatened with homelessness can be life-long. Sometimes being homeless is epitomised by the rough sleeper who is living on the streets, but this group of people form a relatively small proportion of all homeless households. Many homeless households are 'hidden' as they may have access to some sort of shelter, but lack a stable, long term, settled home often moving from one form of temporary accommodation to another with consequent impact on health and wellbeing of households and children's education.

Homelessness can also have significant cost implications for local housing authorities and their partners at a time when overall public resources are reducing. This strategy is therefore focused on how the local authority partners working with key partners can help prevent homelessness occurring.

The scope of this strategy was informed by early stage consultation with key stakeholders, which helped us to develop the following strategic objectives:

- ***Early intervention to prevent homelessness before a crisis point is reached.***
- ***Provision of appropriate advice, accommodation and support if crisis occurs.***
- ***Prevention of repeated homelessness to ensure people have settled homes.***

While the strategy is for a five year period up to 2019 we recognise that there will be a need to keep the strategy under regular review (especially the action plan) and that there is a need for flexibility so that it can respond to national policy changes and emerging local strategies.

Review of the strategy will be undertaken by a strategy steering group comprising the council's and key stakeholder partners and there will be opportunities for local forums to assist in this process.

### **3. The Changing Context**

Since the adoption of the previous strategy the national economic context has changed significantly and the government's deficit reduction programme has had an impact in a number of ways.

Government funding to local authorities has reduced significantly and consequently, there is a need to ensure that services are delivered in the most cost effective way possible and to look at alternative models of service provision which are more financially sustainable.

Government has started to introduce its welfare reform programme aimed at incentivising work and individual responsibility. It is recognised that these reforms may have an impact on homelessness and therefore mitigation measures need to be considered within this strategy.

Changes have been made to the way that new affordable housing is funded with a greater share of the development cost being funded by registered providers from the increased revenue streams generated from higher, affordable rent levels. There is a generally recognised need for more affordable housing within East Kent however new provision is still constrained by economic factors.

Local authorities have also been given new responsibilities and flexibilities.

A new health and care system has been introduced with local authorities assuming new strategic responsibilities for the health and wellbeing of residents in their local communities. There are recognised benefits from developing more integrated and preventative services which reduce expenditure on acute health care. Given the

health impact of homelessness it is important that the strategy is aligned with these health and social care aims.

The Localism Act 2011 introduced tenancy reform measures designed to help housing authorities make best use of the housing stock in their districts and to meet its housing duty to homeless households through use private of the private rented sector.

#### 4. Where we are now?

##### **Responding to change**

The council's have already started to respond to the changes set out above.

All have developed Tenancy Strategies and Policies which recognise the new funding arrangement for affordable housing and seek to use the new tenure flexibilities to make best use of the social housing stock and ensure that it is occupied by those who need it most.

The importance of housing in relation to health & wellbeing has been recognised in the new structures that have been put in place and is included in the joint working on integrated service commissioning.

In 2013 the Joint Planning & Policy Board for Kent published its **Think Housing First** action plan which builds on the housing strand of the overarching Kent health inequalities action plan **Mind the Gap** (2012-15). The document recognises the strong links between housing and health and identified a number of housing issues that have a significant impact on health and well-being. These included rough sleeping and homeless households living in temporary accommodation.

We are responding directly to the need for additional affordable housing by using the new freedoms relating to the use of Housing Revenue Account monies and Right to Buy receipts to enable the building of new homes.

The majority of services providing housing related support to homeless households in East Kent receive funding through the Supporting People programme. In 2013 Kent County Council as the Supporting People Administering Authority initiated a review of its strategic approach to commissioning services and research was undertaken by the Chartered Institute of Housing to assist with the development of a new Commissioning Strategy. The collaborative approach being taken by the four east Kent Councils in relation to homelessness prevention will provide collective strength in influencing future commissioning decisions.

We have been working with our ALMO partner, East Kent Housing to mitigate the impact of welfare reforms on Council tenants such as removal of the spare room subsidy and thereby help avoid the potential for homelessness as a result of rent arrears. Additional staff resources have been employed by EKH to assist with this and EKH will be developing a strategy for mitigating the impact of further reforms.

The economic recession has affected the ability of people to find their own housing solutions. Prospective homebuyers are unable to secure mortgages and there is a lack of confidence among financiers and developers. In response, the Government has established a series of schemes to help buyers into the market.

## 5. Issues with potential impact on homelessness

Recent and current developments which may lead to increasing demand for homelessness services are:

- a) **Housing benefit reform** in April 2012 resulted in changes being made to Local Housing Allowance (LHA) rates which has reduced the ability of low income households to access private rented accommodation which is affordable. Only three in ten properties are affordable for people on LHA.
- b) **An increase in the age threshold that applies to the single room rate** as a consequence of which most single people under the age of 35 who are claiming Housing Benefit will only receive enough money for a room in a shared house. Prior to January 2012 the age threshold was 25. Consequently, an increased number of single people living in one-bedroom self-contained accommodation have found their ability to pay for their home significantly reduced, as can be seen by the example in the table below. There is a possibility that over time this will lead to an increase in the number of Houses in Multiple Occupation (HMOs) and there is also concern about the potential risks of vulnerable single people having to live in shared houses. We therefore need to find ways that risks can be minimised and develop options that help people find safe, secure, quality accommodation.

### Weekly LHA rates for April 2014<sup>1</sup>:

Type of accommodation	1 bedroom, shared facilities (SAR)	1 bedroom, self-contained	Difference between the two:
Canterbury	£73.88	£119.10	<b>£45.22</b>
Dover/Shepway	£58.50	£86.54	<b>£28.04</b>
Thanet	£60.84	£80.77	<b>£19.93</b>

In addition householders with non-dependent adult children have to pay more. Some may evict their non-dependant. Most of those affected are unlikely to be in Priority Need under homelessness legislation, but will need advice and assistance, stretching limited resources. East Kent councils are working with Registered Providers (RPs) and reputable landlords to increase the stock of well managed, good quality HMOs and studio flats within LHA rates.

- c) **Insufficient accommodation for large families.** There is an identified need to increase the number of affordable, large family homes. However, the new Affordable Rent model, means that the provision of four bedroom houses is less financially viable. We are also in discussions with private landlords and Registered Providers to expand the Housing Association Leasing Scheme but LHA changes will create difficulties in securing larger homes because the highest rate available for any family will be for four bedrooms, irrespective of household size.
- d) **Changes to the benefit system** have been described as the most radical for 60 years. Under Universal Credit, due to be phased in between October 2013 and October 2017, working-age tenants will receive a single monthly payment directly from the Department for Work and Pensions (DWP). This will include their support for housing costs. This represents a significant departure from the current

<sup>1</sup> LHA rates taken from Registered Landlord Association website: RLA.org

arrangements, under which many social tenants have their Housing Benefit paid directly to their landlord and receive other benefits weekly or fortnightly. Consequently, there is concern about the impact this may have on rent arrears and resulting homelessness.

- e) **An Overall Benefit Cap** of £500 per week for couples and families, and £350 per week for single people. This will affect larger families mainly living in the private rented sector, particularly in expensive areas like London. There is concern that over time, this will result in migration to areas with much cheaper rents, such as some of East Kent's coastal towns, which already suffer high levels of deprivation.
- f) **Reduction in Housing Benefit for Spare Bedrooms in Social Housing** which applies to Social housing tenants living in homes where it has been determined that they have more bedrooms than they need. Households under-occupying by 1 bedroom will have their Housing Benefit reduced by 14%, for 2 or more bedrooms the reduction is 25%. Tenants of pensionable age are exempt as are some households with medical circumstances which necessitate additional bedrooms. Social landlords have seen an increase in demand from tenants wanting to move to smaller homes, which can be in short supply and not immediately available. There is also concern about the potential on-going impact on rent arrears especially where tenants are trying to meet the benefit shortfall from their own financial resources.

## 6. Causes of homelessness

Local authorities are required to submit a comprehensive set of data returns to government on a regular basis. An analysis of this data across the four council's indicates that the main causes of homelessness are:

- Relationship breakdown
- Loss of secure accommodation
- Insecurity of tenure
- Loss of work or reduction in income

Some households fall into more than one category and certain factors such as financial pressures feature regularly.

We also know that a significant proportion of single person homeless households are vulnerable and often have other support needs.

Key homelessness related data is set out in Appendix 1.

## 7. Resourcing the Strategy

The level of resources available to enable the delivery of this Strategy is likely to be considerably reduced over the next few years. The key financial constraints that may affect the delivery of this Strategy are as follows:

- Reductions in the levels of overall funding from Central Government Local Authorities will place more pressure on local services, including Housing Options Services.
- The future of the Government's Homelessness Grant for Local Authorities is uncertain beyond 2015.
- The levels of funding available to provide support services are likely to come under increasing pressure during the course of this Strategy
- Ongoing Government changes to the levels of Local Housing Allowance available will restrict the types of property that are accessible to people on low income and in receipt of housing benefit.

To fully implement this strategy we will need to harness resources from a variety of different sources, public and private, and from both new and existing sources.

Details of the resources required to deliver this strategy and their sources are set out below. At this time it is important to recognise that the total level of resources that will be available to deliver this strategy are unclear.

The priorities set out in this strategy will be funded through a combination of the following resources.

- Revenue funding provided by each of the council's to deliver its Housing Options Service and provide homelessness prevention solutions, such as rental deposit bonds.
- Funding streams from Central Government including, the Homelessness Grant and specific funding such as resources to cover transitional housing benefit payment.
- Capital resources provided by the Homes and Communities Agency to fund the development of new affordable homes, including new projects to specifically assist homeless people and other vulnerable households.
- Resources provided by Kent County Council through Supporting People to provide housing related support for vulnerable people.
- Capital resources invested by the councils and our registered provider development partners to deliver new affordable homes across East Kent.
- Investment by private owners to deliver homes for rent across East Kent.
- Resources provided by voluntary partners including staff time and funding for service provision.

### **Future Resources**

Any increase or decrease in the level of resources set out in this Strategy, will clearly impact on our ability to deliver against our strategic objectives and targets. During the course of this Strategy, we will provide further updates on changes to the available resource streams and the impact this will have on our Strategy programme.

## **8. Priorities**

Based on our understanding of the issues and causes of homelessness, we believe that our strategic priorities for tackling homelessness in East Kent over the next five years should be:

***Priority 1: Preventing and responding to homelessness before a crisis point is reached***

***Priority 2: Preventing and responding to rough sleeping***

***Priority 3: Providing high quality housing options advice before a crisis point is reached and appropriate advice, accommodation and support if crisis occurs***

***Priority 4: Providing good quality housing that local people can afford and making best use of the housing stock***

***Priority 5: Promoting partnership working and shared good practice***

***Priority 6: Deliver excellent homelessness services***

We recognise that individual council's may wish to give greater emphasis to some of these priorities in order to address local concerns and that the specific actions each local authority may implement may vary. However, we agree that the areas for action in meeting priorities should include:

### **Preventing homelessness**

Our approach to preventing homelessness will include:

- Developing options to prevent parental exclusions causing homelessness including mediation schemes, working with families to develop a re-housing plan for younger generations
- Ensuring Housing Options services are designed to maximise the prevention of homelessness and ensure the best use is made of resources
- Developing integrated financial management, budgeting skills and benefit advice services
- Working with East Kent Housing on the development of a welfare reform strategy
- Ensuring that rent deposit schemes remain financially sustainable
- Developing 'Tenant Ready' schemes
- Addressing the problem of rough sleeping and ensure effective reconnections to home area for rough sleepers
- Supporting organisations who help in getting homeless people away from sleeping on the street
- Ensuring effective Move On Plan Protocol mechanisms

### **Providing high quality housing options advice**

We will aim to improve our housing options service by:

- Developing arrangements for collecting customer feedback on service provision and for related service improvement.
- Ensuring provision of web based information is of a consistently high standard and increases ability for service users to self serve

### **Providing good quality affordable housing and making best use of the housing stock**

We will seek to make best use of resources by:

- Taking a direct role in the provision of new affordable housing where this is financially viable
- Taking a pro-active approach to bringing empty homes back into use

### **Promoting partnership working and shared good practice**

We will encourage and facilitate partnership working by:

- Developing early warning systems with partners – identifying homelessness at key intervention points (statutory and non-statutory) – including improved hospital and prison discharge protocols, planning for care leavers
- Developing improved service information and data sharing arrangements between partners
- Ensuring that homelessness is recognised as a priority for consideration by the Health and Well Being Board
- Encouraging more Employment Education and Training work and supporting and growing social enterprises locally

The councils are aware of the homelessness prevention framework provided by government in its Housing Options Tool kit and believes that this strategy demonstrates their commitment to working towards meeting the ten key challenges:

1. To adopt a corporate commitment to prevent homelessness this has buy-in across all local authority services.
2. Actively work in partnership with the voluntary sector and other local partners to address support, education, employment and training needs.
3. Offer a Housing options and Homelessness prevention service, including written advice to all clients.
4. Adopt a 'No Second Night Out' model or an effective local alternative.
5. Have housing pathways agreed on development with each key partner and client groups that include appropriate accommodation and support.
6. Develop a suitable private rented sector offer for clients, including advice and support to both clients and landlords.
7. Actively engage in preventing mortgage repossessions including through the Mortgage Rescue Scheme.

8. Have a Homelessness Strategy which sets out a proactive approach to preventing homelessness and is reviewed annually so that it is responsive to emerging needs.
9. Not place any young person aged 16 or 17 in Bed and Breakfast accommodation.
10. Not place any family in B&B unless in an emergency and then for no longer than 6 weeks.

## **9. Recognising the Local Context**

While the impact of changes at a national level has a similar impact on our four council's we recognise that the context at a local level can vary and consequently while we agree on an overarching strategic approach we accept the need for local flexibility to address specific issues. Profiles for each of the districts are therefore attached at Appendix 2 and provide the local context and identify some of the local issues.

In order to ensure these local issues are addressed we also recognise the need for local flexibility in approach. Therefore while all four council's are committed to addressing the shared strategic priorities, individual action plans have been developed and these are attached at Appendix 3. Many of the actions are consistent in terms of approach and outcome but a number are intended to address local concerns.

## **10. Partnership Working**

The council's work with a wide range of statutory and voluntary sector partners to try and prevent homelessness. It is therefore extremely important that we have their support in meeting the priorities and delivering the actions.

One of the priorities of this strategy is to establish a partner engagement structure at the both the East Kent and district council levels. This will comprise a Homelessness Strategy Steering Group for East Kent which will be responsible for delivery of the strategy and undertake annual strategic reviews and a local homelessness forum within each district responsible for regular action plan monitoring and disseminating good practice.

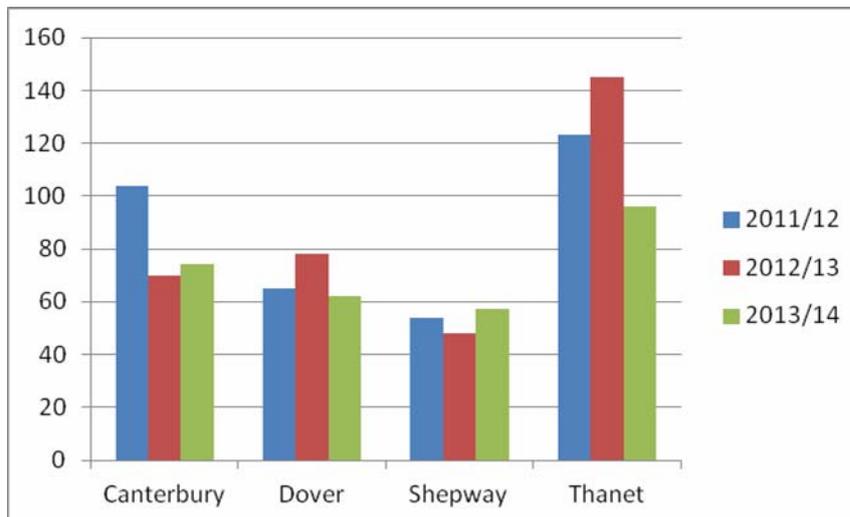
The Steering Group will comprise representatives of the four councils together with one partner representative from each of the local groups and will meet twice a year.

The individual councils will have responsibility for determining membership of their local forum.

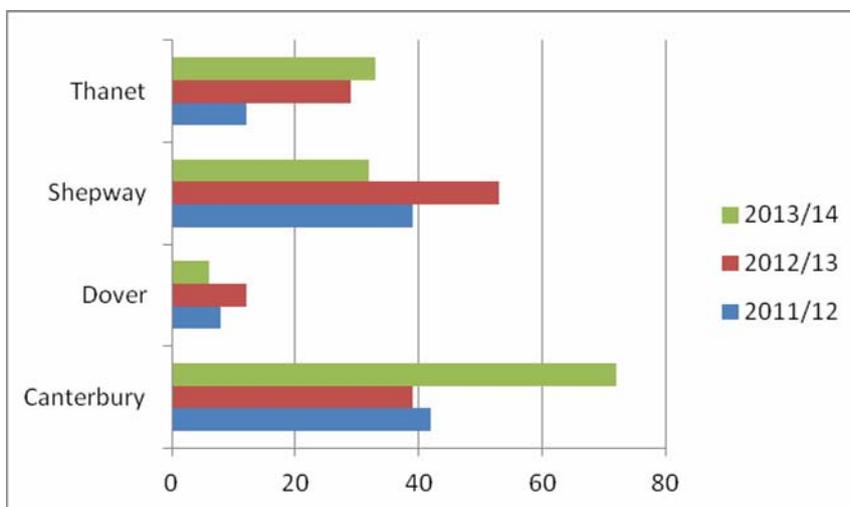
EAST KENT HOMELESSNESS PREVENTION STRATEGY – 2014-19

HOMELESSNESS RELATED DATA FOR EAST KENT - 2011/12 – 2013/14

Households accepted as homeless



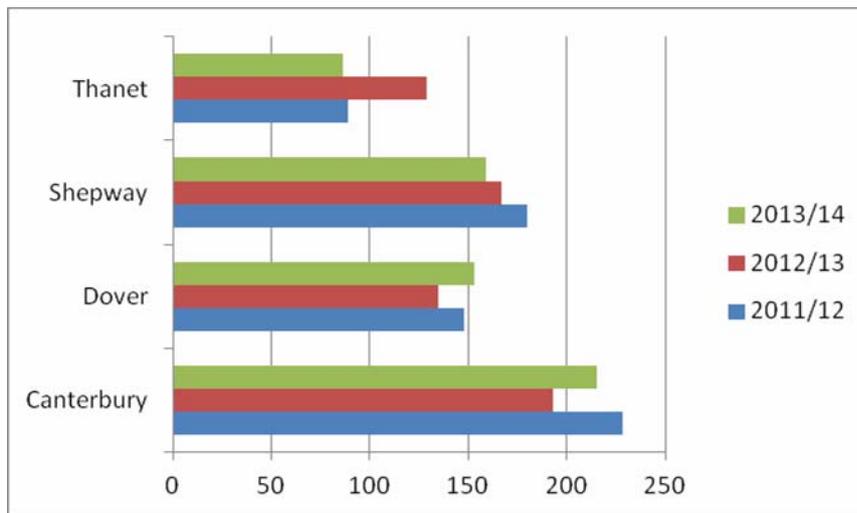
Households found to be 'intentionally homeless'<sup>i</sup>



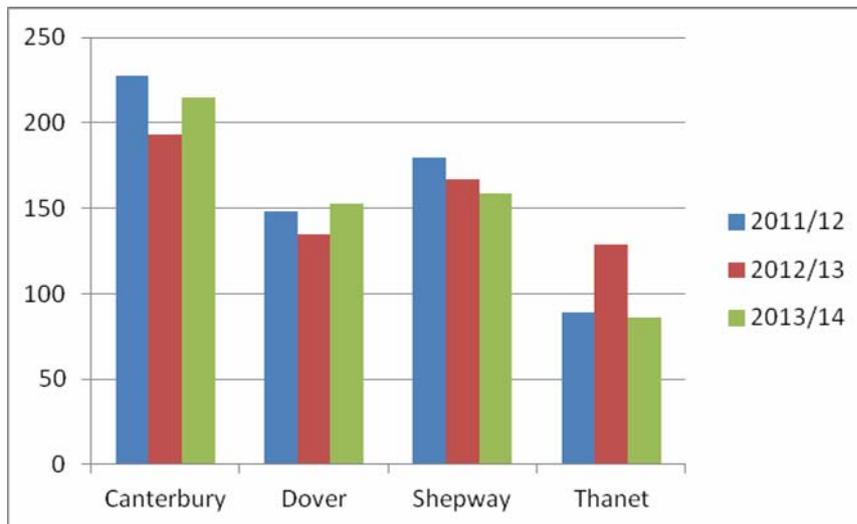
Households found to be homeless but not in priority need<sup>ii</sup>

	2011/12	2012/13	2013/14
Canterbury	343	357	383
Dover	7	18	11
Shepway	17	18	17
Thanet	11	28	64

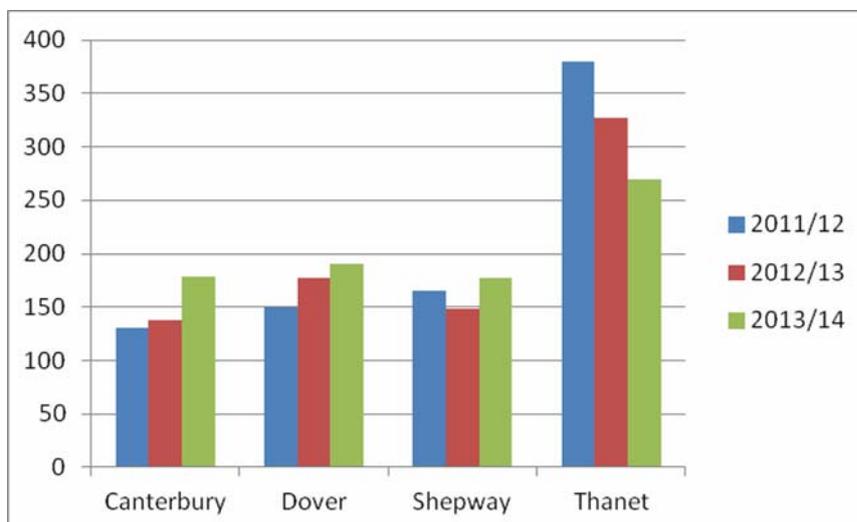
### Households in temporary accommodation



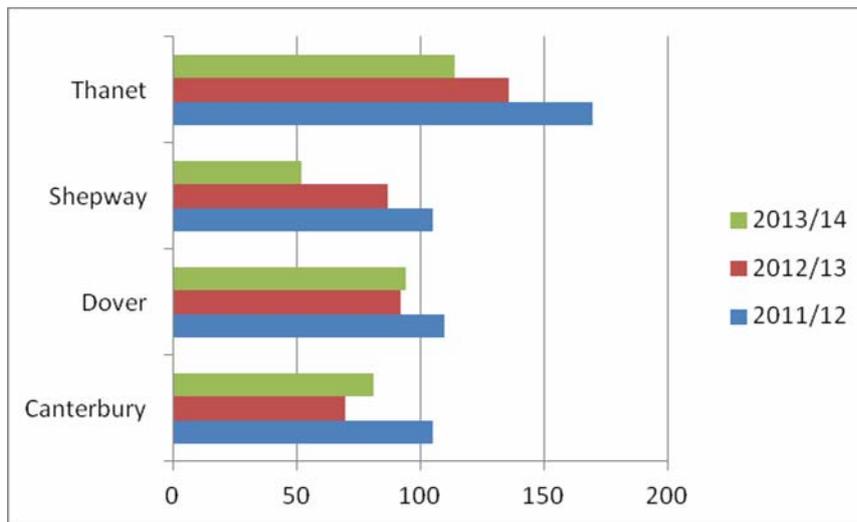
### Households with dependent children in temporary accommodation



### Possession orders made for landlords



## Possession orders made for mortgage lenders



<sup>i</sup> Intentional Homelessness is prescribed in legislation and refers to circumstances where a household knowingly did, or failed to do, something which resulted in them losing their home which they could otherwise have reasonably expected to have continued living in.

<sup>ii</sup> Priority Need in the context of homelessness is prescribed in legislation. The following categories of household who are legally homeless will normally be considered to be in Priority Need:

- Adult households with children for whom they are responsible and who normally live with them and where the children are under the age of 16 or under the age of 19 and in full time education.
- Households where a member of the household is pregnant
- Young people aged 16 or 17 and not eligible for housing from Social Services
- Care leavers aged 18 – 21
- Households made homeless by fire, flood or other disaster
- Single people who are assessed as being vulnerable due to age, serious health problems, physical disability, learning disability or for other reasons.

Generally single people aged between 18 and 60 (unless included in any of the above) are not considered to be in priority need .

### DOVER DISTRICT PROFILE

#### Local Context

The district comprises both rural and urban settlements. The current population is approximately 112,000 with around 65.5% of the population living in the urban areas of the Dover district: Dover, Deal and Sandwich. It is projected that the population will grow to approximately 117,000 by 2021.

In 2010 the Index of Multiple Deprivation (IMD) ranked Dover district as the 4<sup>th</sup> most deprived area behind Thanet, Shepway and Swale. While deprivation is concentrated in a small number of wards, the index ranked 11 super output areas in the 20% most deprived nationally with 2 LSOAs, St Radigunds and Buckland, in the top 10%.

The diversity of the district presents many opportunities and challenges. Throughout the district sensitive issues such as low skills, pockets of deprivation, health inequalities, environmental issues and transport problems need to be tackled in both urban and rural areas. Deprivation is of particular concern in several of the district's inner urban areas and there are many challenges to overcome including poverty and social exclusion, education and skills and social welfare.

#### Local Housing & Homelessness Issues

##### Housing Affordability

Average house prices and private sector rents are amongst the lowest in Kent. The lower quartile house price to income ratio, at 6.31, is the lowest in Kent and lower than the national average of 6.59.

However, while lower rentals mean that renting in the private sector is a realistic option for many working households the lower Local Housing Allowance rates still mean that accessing this sector can be difficult for households claiming housing benefit. Although, a private sector leasing service is being provided through a registered provider partner we need to look at how we make more effective use of this resource.

##### Current Social Housing Stock

The social housing stock (council and housing associations) comprises approximately 6,000 dwellings. While the number of council homes has been reducing there has been a small overall increase in the stock of social housing between 2009 and 2013 due to the provision of new housing association owned homes.

The number of social tenancies being granted in the district remains relatively high compared to other Kent districts. However, the council recognises that there is a need to try and provide more affordable homes.

##### Making Best Use of the Existing Housing Stock

The Council has recently adopted a Tenancy Strategy and underpinning Tenancy Policy which enables it to take advantage of the new tenure flexibilities provided for in the Localism

Act 2011. This will enable to Council to ensure that the limited stock of social housing is targeted at those households with the greatest need.

In addition to enabling the provision of flexible tenancies the Tenancy Strategy also recognises that provisions in the Localism Act 2011 allows local authorities to meet their homelessness duty by providing good quality private rented homes. The Council has welcomed this but has also made a commitment that it will seek to ensure that any offer of private rented housing is appropriate to the needs of the household and the minimum length of any tenancy will be 12 months.

#### New Affordable Housing Provision

Over the period 2009/10 – 2012/13 the council enabled the delivery of 360 new affordable homes and while only 28 new affordable homes were built in 2013/14, current projections indicate the delivery of a further 271 by the end of 2015/16.

While the relatively low house values in parts of the district helps in terms of affordability it can have the downside of making the provision of affordable housing less economically viable. Nevertheless, the Council will continue to seek the provision of affordable housing in accordance with planning policies set out in its Core Strategy and adopted planning guidance.

As well as enabling new provision by housing associations the Council has also recently started to directly develop new affordable homes.

#### Demand for Affordable Housing

As at 1 April 2014 there were 2,883 applicants on the Council's housing register compared to 2,901 at the same date in the previous year. Approximately 29% of current applicants are social housing tenants seeking transfers.

Analysis of new housing benefit claims has not yet identified any trends relating to the inward migration of households from areas with higher housing costs as a result of welfare reforms however this will need to be closely monitored.

#### Homelessness Context

The number of homelessness applications made to the council in 2013/14 was 152, just under 30% lower than in 2012/13. The number of applications accepted was 56 approximately 28% lower than in 2012/13.

#### Homelessness Acceptances

The number of homeless acceptances by the council in 2013/14 was lower than for 2012/13. The Homeless acceptance rate per 1,000 households in the year was 0.32 fractionally lower than the Kent average of 0.33 and significantly lower than the national average of 0.57. The number of acceptances has in fact remained relatively stable for a number of years.

The main reason why households with dependent children become homeless is parents or other relatives no longer being willing to accommodate them.

## Homelessness Prevention

### Rent Deposit Bond Scheme

The use of deposit bonds has always been high due to the large private rental sector in the district. This had resulted in a significant financial commitment however from April 2013 we have been working with East Kent Services to access the Discretionary Housing Payment budget to provide deposits and rent in advance. This has reduced the number of bonds issued and therefore the financial burden has reduced. We are also developing a more financially sustainable rent deposit guarantee scheme.

### Use of Temporary Bed & Breakfast Accommodation

Wherever possible the Council tries to avoid the use of temporary accommodation but the emergency nature of the service means this is not possible for many households. The Council will also try to avoid using Bed and Breakfast accommodation through the use of other forms of temporary accommodation such as hostels and supported housing whenever this is possible.

Over the past 3 years the numbers in temporary accommodation including bed and breakfast had been stable with a slight reduction in the latter part of 2013 however, the growing number of homelessness applications and acceptances means that current use is higher than we would like. The following table shows the numbers of households in temporary accommodation and B&B at the end of each quarter for the past two years.

	<b>Numbers in temporary accommodation</b>	<b>Numbers in bed &amp; breakfast</b>
Mar-12	29	17
Jun-12	34	24
Sep-12	37	21
Dec-12	35	19
Mar-13	37	21
Jun-13	42	28
Sep-13	35	16
Dec-13	39	18
Mar-14	37	15
Jun-14	53	25
Sep-14	59	29
Dec-14	59	31

### Vulnerable Single People

In DDC the majority of households accepted as homeless are vulnerable single people: 67 out of 107 acceptances between Q1 2012 and Q2 2013 (63%).

DDC and Shepway have a similar profile and appear to have the highest proportion of vulnerable single homeless acceptances in Kent. This group accounts for the majority of households placed in temporary accommodation.

A significant proportion of single homeless people were accepted as being in priority need due to mental health problems.

Housing options for this group are limited and have been further restricted by changes to the single room rate.

### Young People

In recent years Dover District Council (DDC) has had one of the highest rates of youth homelessness in the region but a recent restructure in the way the service is delivered has resulted in a significant reduction in the number of young people needing to be housed in temporary accommodation.

The number of 16/17 year olds where a homelessness application was accepted fell from 30 in 2012/13 to 6 in 2013/14. This dramatic reduction numbers means that as at 31 March 2014 there were no 16/17 year olds in temporary B&B accommodation.

The Council liaises closely with relevant statutory agencies and local organisations such as the Phoenix Youth Centre in Sandwich to identify issues impacting on this group. Partnership work in recent years with KCC Supporting People and Stonham has enabled the provision of 14 units of supported accommodation in Dover and 4 units of floating support to help meet the housing needs of young people.

The Kent Young Persons' Homeless Protocol sets out the responsibilities that KCC Children's Social Services and local housing authorities have when addressing the needs of young homeless people between the ages of 16-21. We will seek to ensure that the protocol is implemented appropriately within the district and we also want to continue working with Social Services on the implementation of what is referred to as the 'Dartford Model' of homelessness prevention.

### Rough Sleeping

The annual street homelessness estimate was undertaken in October 2013 and reported 5 people sleeping rough across the district. The figure for the previous year was also 5.

While the estimate doesn't indicate an increase in the incidence of rough sleeping the council recognises the need to continue working closely with third sector organisations providing services to this group of people