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Submission to the Ministry of Housing, Communities and Local Government Committee's Inquiry into the Impact of COVID-19 (Coronavirus) on homelessness and the private rented sector

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Summary

Haringey Migrant Support Centre is a small charity based in North London that provides welfare support and access to legal advice for migrants in London and the surrounding area. The ongoing coronavirus pandemic has brought unprecedented demand on HMSC's services, particularly with regard to homeless and rough sleeping migrants requiring assistance in accessing the resources that are so essential to one's ability to practice social distancing, self-isolation, and quarantine.

Our experience, outlined in the evidence below, has led us to conclude that the Government has not done enough to support homeless and rough sleeping migrants, nor the organisations and public bodies tasked with providing essential housing support. A lack of statutory regulation; clarity of process; adequate safeguarding mechanisms; and targeted funding, has meant that too many vulnerable people are still homeless or rough sleeping, or run the risk of doing so. This undermines any public health strategy that the Government is undertaking. A failure to protect the most vulnerable is a failure to protect us all.

Method

We are using the Minister for Housing's [letter](#) to local authorities, dated 26 March, as the basis of our assessment of councils' actions regarding homelessness and rough sleeping as part of their COVID-19 response. This is because it is a record of the Government's stated objectives regarding homelessness and rough sleeping during this period. The letter is also a source of supporting guidelines issued by the Government to have its stated objectives fulfilled.

Where relevant, we will also be highlighting the impact of interventions - or lack thereof - of other Government departments in examining the impact of COVID-19 on homelessness, rough sleeping, and the private rented sector.

The examples given primarily concern the responses of London's local authorities. For that reason, for each example case we are using in this submission, we have named the Council/s that was involved. However, we have anonymised any personal details relating to the persons involved in the case so as to protect their confidentiality. We provide dates only in cases where doing so does not compromise the confidentiality of our visitors.

We are using a critical sample of cases to evidence the most frequent and concerning issues we have seen and the conclusions we are drawing from our experience. Please note that, if there appears to be an insufficient quantity of cases being used to illustrate our points, it is due to the limitations of evidence submission and not due to a lack of available data for use.

Key issues

1. The lack of statutory obligation for local authorities to fulfil the Minister for Housing's directive that accommodation be provided for all homeless people, regardless of their nationality or immigration status

In Minister Hall's letter to local authorities, he includes a list of basic principles underlying his directive to councils. His third point states that local authorities are to "*utilise alternative powers and funding to assist those with no recourse to public funds who require shelter and other forms of support due to the COVID-19 pandemic*".

However, the lack of statutory duty on councils to comply with the Minister for Housing's directive to 'bring everyone in' has resulted in ad hoc, inconsistent, and narrow interpretations of the directive by London local authorities. Based on our experience in supporting migrants in attempts to access emergency accommodation, we infer that such interpretations are, in part, based on the individual service capacity and prioritisation of statutory instruments used to form the basis of each council's COVID-19 homelessness response.

For example, in some councils, such as Islington and Greenwich Councils, we have been told that the respective councils' No Recourse to Public Funds teams manage the accommodation for migrants with NRPF. This is with the exception of asylum seekers and refused asylum seekers, who are advised to access emergency accommodation from the Home Office, which we are told is taking the lead on providing for these service users.

However, in similar cases where a migrant rough sleeper with the NRPF condition has attempted to access emergency accommodation elsewhere, other councils have indicated that accommodation will not be provided for them.

This inconsistent approach is, in our view, in part a result of the lack of statutory instruments underpinning the Minister's instructions. Despite the urgency of the public health need to accommodate all homeless people during the coronavirus outbreak, it has not been made a legal duty for councils to do so.

The lack of statutory obligation on councils to provide emergency accommodation for *all* rough sleepers during the COVID-19 pandemic sees local authorities allocating limited accommodation stock on the basis of unstandardized eligibility criteria, such as the presence of the NRPF condition or whether an applicant is a ['verified'](#) rough sleeper. Where applicants are refused accommodation, or remain destitute due to the slow response of local authorities to act on referrals, there is limited urgent legal recourse that can be considered, due to the lack of legal duty on councils, the strain that many immigration and public law firms are under with their caseloads, and the extremely limited availability of Legal Aid.

Overall, this has a marked effect on individuals with No Recourse to Public Funds - particularly those who do not have an asylum claim. The lack of legal duty to accommodate homeless people has resulted in an inconsistency in homelessness relief efforts that sees already vulnerable individuals made markedly more so in the current circumstances.

2. The conflicting duties presented by the directive to 'bring everyone in'

As discussed, the Minister for Housing's request that councils provide accommodation for all homeless people, while urgent in the current circumstances, has no legislative authority behind it. The lack of statutory instrument/s to underpin the Minister's instructions has, in our view, presented to councils a conflict between their public health responsibility to prevent the risk of transmission and infection of the coronavirus – which the 'bring everyone in' directive aims to do – and the statutory duties they must still comply with. This is particularly with regard to the contents of the Housing Act (1996), the Immigration Act (2016) and the Homelessness Reduction Act (2017).

The Housing Act (1996) legislates that people with NRPF are ineligible for homelessness assistance. In practical terms, this has resulted in the NRPF condition being used as a criterion by which eligibility for accommodation is assessed. Based on the responses of some councils, we infer that this legislation continues to form the statutory basis on which an applicant with the NRPF condition is found ineligible for emergency accommodation, despite the Minister's request in light of the circumstances presented by COVID-19. The contradictions posed by these duties could very easily be resolved if the Secretary of State for the Home Department followed calls for her to [suspend](#) the NRPF in order to protect migrants' wellbeing and the wider public health.

The Immigration Act (2016) expands on the aim of the Immigration Act (2014) in administering a 'hostile environment' in areas of both public and private life. Both acts place statutory obligations on bodies such as councils, the police, and law enforcement authorities to share data with the Home Office regarding individuals with irregular status. This places homeless and destitute migrants in a fraught position: many are afraid to access essential services, including emergency accommodation and healthcare, because of the statutory obligation placed on public bodies to effectively act as border enforcement when engaging with migrant service users. There is concern that, if migrant service users access emergency accommodation, their data will be shared by councils with the Home Office. Worries arise of the possibility of imminent arrest, detention and deportation on resumption of pre-coronavirus circumstances.

In our experience, councils have not been able to confirm if a data-sharing firewall can be put in place for the duration of the coronavirus outbreak. This results in risk-avoidant migrants avoiding accessing essential services, thereby demonstrating the conflict between the Minister's mandate and other statutory obligations councils are under.

The lack of clarity from the Government as to how to resolve this conflict of duties has left councils to individually interpret how to comply with seemingly contradictory obligations. This has resulted in a variance of strategies and processes being devised across different boroughs to decide how emergency accommodation is accessed, with the effect that the Minister's instructions that all homeless people be accommodated is far from being fulfilled. Further, this lack of consistency in local authorities' responses is confusing for service users to navigate and results in what is effectively a postcode lottery as to whether or not people are able to access accommodation.

3. How to practically 'bring everyone in'

There is a lack of clarity as to whether or not a coordinated response across councils, outreach teams, homeless shelters and charities has been devised and implemented. In our experience, there has not. Homelessness and rough sleeping are dealt with on a case-by-case basis, with little standardisation of policies or processes.

The Minister for Housing's letter provides a list of recommended actions for councils to undertake, which includes "*[u]rgently procuring accommodation for people on the streets if you have not already done so – MHCLG will support you to do so if you are struggling to procure sufficient units*".

However, from our perspective as a client-facing third sector organisation, there is little transparency as to how the procured extra accommodation units to be used during this period are allocated, and if the MHCLG has made available more units to meet demand. If allocation is based on the rate of homelessness and rough sleeping per borough, then Westminster City Council should have a surplus of accommodation to use. In our experience of Westminster City Council, it has stated that it has been at capacity for some time now, despite there still being many more homeless and rough sleeping migrants who need assistance.

On top of the issues of accommodation capacity, we understand that councils' responses are compounded by the funding burden councils are sustaining during this period. We note that some councils are expected to ['go bust'](#) due to investment asset devaluation and falls in council tax, whilst the demands – and therefore costs - for social care, housing and benefits increase. A £3.2 billion fund for all councils cannot mitigate these expenses, especially given that the current crisis follows ten years of austerity.

The combination of soaring expenses and scant accommodation availability has meant that councils do not have the practical means to 'bring everyone in'. Coupled with the conflict of duties, we believe that this is why most local authorities are still using tests and eligibility criteria to assess whether people can access services. As said, how these tests and criteria are devised is not standardised across councils. It is instead left up to the individual council's interpretation of statutory duties and its availability of provisions. The lack of clarity in the Government's guidance as to how councils can practically meet the directive has resulted in too many vulnerable people, such as the undocumented, the hidden homeless and 'sofa surfers', still consigned to homelessness and rough sleeping.

4. Safeguarding duties and responsibility for service provision

The Housing Reduction Act (2017) places a 'duty to refer' onto councils in cases where an applicant for homelessness support, if ineligible for support from that council, must be referred onto other services for which they are eligible. In practical terms, this is often decided by determining whether the applicant has a 'local connection' to the council from which they are seeking support. 'Local connection' has flexible interpretations, but is most

commonly based on examples such as proof of residence in that local authority, or a record of services being accessed previously in that borough.

Most councils are accommodating homeless individuals – including those with NRPF – on the basis of a local connection. However, the long-term homeless often do not have one clear local connection. Homeless people and rough sleepers move in and between boroughs (and, indeed, across the country) as they attempt to access shelter, food, and either temporary or long-term accommodation and support. They also frequently move for their safety, or because a source of help is no longer available to them. Their frequent travel is a known fact to those working in migrants' support, and is often reflected in logs on the CHAIN database.

In our experience, in cases where no concrete 'local connection' can be established, councils effectively 'ping pong' responsibility between them. This passing of responsibility between one and the other sees no council taking responsibility. This, quite obviously, is a detriment to the welfare of the applicant as they are left to wait for the dispute over responsibility to be resolved in order to access essential services. In effect, applicants are often effectively made to remain homeless and destitute.

It appears that some councils had been trying to avoid such detriment by invoking the 'ordinary residence' clause under the Care Act (2014) in order to provide emergency support, regardless of the 'eligibility' of the applicant. However, as this was not consistently invoked across councils, and some councils indeed were perhaps not shouldering their due responsibilities, it has resulted in such councils facing overwhelming demand as they attempted to absorb the referrals and responsibilities of others. In some cases, we have seen such councils forced to change their process, as following absorption of the ['first wave'](#) of referrals in the three weeks following the Minister's letter, they reached capacity and reverted to using eligibility criteria to allocate the remaining support available. The overall demand is not distributed effectively, to the detriment of the homeless and rough sleepers who have yet to be supported at the time of writing.

Key findings

1. Councils are rejecting some referrals outright on the basis of individuals having no recourse to public funds (NRPF).

The following are examples of this practice:

- 1.1 On 30th March, Haringey Council's housing department told us on the phone that they categorically could not assist our client as they did not have recourse to public funds.
- 1.2 On 31st March, a Customer Advisor in Islington Council's Out-of-Hours Emergency Housing team told a caseworker that those with NRPF would not be accommodated by Islington.
- 1.3 On 24th April, the Housing department at Leicester Council told us they were not sure they could not help our client as they had NRPF.
- 1.4 It is of note that both Haringey and Islington have accommodated those with NRPF at other times; the approach of councils is marked by inconsistency and confusion.

2. Councils will not give assurances to those with irregular immigration status that their data will not be shared with the Home Office.

- 2.1 Indeed, an advisor at Greenwich told us on the 31st of March that accommodation for our client would only be for the duration of lockdown and that after that period our client would be 'encouraged' to 'go back to their country of origin'.
- 2.2 This policy leads some of our clients to feel they must avoid some council services despite the risks posed by the COVID-19 pandemic.
- 2.3 For instance, when we raised one of our clients' concerns about their data being shared with the Home Office with Homes for Haringey, we were told by the council:

'We cannot guarantee that the information will not be shared with the Home Office either I am afraid.'

- 2.4 Our client was incredibly scared by this: if the client were to be detained and deported/ removed, as a result of Homes for Haringey giving their location to the Home Office, our client feared they would be killed in their country of origin. Moreover, our client feared being separated from their son in England, who was 'his only hope'. Haringey further investigated our client to confirm our client was not committing fraud by claiming to be homeless - making our client feel like a criminal. Following these experiences, our client refused any interaction with Haringey on the basis that they only 'caused him stress'.

3. A huge amount of work is needed by experienced advocates to get individuals accommodated.

In nearly every case, at least a full day's work is needed to get a client accommodated; completing a referral form almost never succeeds alone. Given the difficulties we have had, we cannot fathom how private individuals – especially those without a computer or phone charge/ credit – are able to successfully get accommodation for themselves.

The following is a typical example illustrating how much work is required for each case:

DAY ONE:

- We refer our client to Street Link
- We refer our client to Haringey, Islington, and Southwark's housing departments – the three areas our client had a connection to - using their online forms
- We write to Jeremy Corbyn MP, Catherine West MP, Neil Coyle MP, and Harriet Harman MP, asking for their assistance with the case.
- We write an email to Southwark Council chasing up the case.
- We call Southwark Council's housing department.
- Haringey and Islington triage our client.
- Our client is not housed that night.

DAY TWO:

- We email and call Haringey Council.
- We email and call Islington Council.
- We write follow up emails to Catherine West MP and Jeremy Corbyn MP – both of whom send emails to their respective councils.
- Haringey call our client to state his case has been closed on the basis of Islington assisting.

- We call Islington who tell us they will not help our client as their triage has revealed that our client is Haringey's responsibility. We point out that Haringey have closed the case and Islington then ask for some follow up information.
- We call Haringey to ask them to re-open the case and are told they will not as Islington have not officially closed their case.
- Islington does not reply to our email with the requested follow up information.
- We call and email Islington multiple more times.
- Our client is not housed and sleeps rough.

DAY THREE:

- We call Islington to follow up the case.
- We email Islington to follow up the case.
- Islington finally offer our client accommodation

4. Councils are slow to act even in extremely urgent cases.

4.1 In one case, a client was identified as vulnerable due to their immigration history that involved trafficking elements; their age; and the NRPF condition. A Street Link referral was made, and urgent emails were sent to Greenwich, Islington and City Councils to try to source emergency accommodation.

4.1.1 City and Islington Councils say that, based on the presence of a local connection to Greenwich, the responsibility to provide accommodation was with that council. However, the day team at the Greenwich Housing department would not take the referral. By 9pm, the out-of-hours Emergency and Social Services teams continued to refuse to help. Astonishingly, a member of the Street Link enquiries team told us that our client should 'go somewhere safe' as the outreach team had not come to pick up on the urgent referral made that day. For a full day, our client had been standing at the same bus stop which had been provided as the location for the Street Link referral. No one arrived; they eventually stayed on a friend's sofa that night, despite the health risk to both our client and their friend.

4.1.2 Despite the acute needs of our client, the attempt to engage with multiple members of staff at Greenwich Council did not result in emergency accommodation being provided. It took another full day of advocacy for our client to be picked up at almost midnight the next night.

4.2 In another case involving a client who was identified as vulnerable due to their age and acute medical needs (cancer, arthritis) who was rough sleeping in Haringey, it required using privileged contacts (i.e contacts obtained via personal working relationships) in order to accelerate the initial process of engaging homelessness services, as outreach teams take 1-3 days to respond to a Street Link referral.

4.2.1 However, nine hours of advocacy had still not accelerated the process to a point where accommodation was confirmed to have been sourced. On speaking to a customer advisor in the out-of-hours Housing department at Haringey Council - who expressed alarm that somebody receiving treatment for cancer had not been met by a day outreach worker - provided yet another contact for us to attempt to make.

4.2.2 Eventually emergency accommodation was secured for the client that night, but it required tenacious insistence and having privileged access to the contact details of senior staff. Even then, the service provided was substandard: no subsistence or essentials such as soap or bed sheets were provided; the toilet was unclean; the sink was blocked; the client had no access to cooking or cleaning facilities. Food, soap and medicine for our client had to be sourced from private individuals and community organisations, like mutual aid groups.

5. Some councils are claiming that their accommodation is full.

5.1 In one case, our client, an extremely distressed individual with significant mental health issues, has been waiting for well over a week to be accommodated by Camden Council, following a Street Link referral.

5.2 When we told Camden about the distressed state our client was in we were told:

'[Our client's] referral is pending as the GLA have limited bed spaces. We have also considered [your client] for a referral into some Temporary Accommodation Camden is managing, again the outcome of this is still pending.'

5.3 We cannot fathom what our client could be waiting for, or why accommodation not currently available will become available. If Camden's reply indicates a 'one in one out' policy towards rough sleepers this would constitute a severe breach of Camden's responsibilities. Such a policy would essentially indicate a 'first come first serve' approach to survival during a pandemic. Worse, such a policy would indicate that Camden / the GLA are relying on some rough sleepers being kicked out of accommodation during this pandemic in order that others be accommodated.

5.4 In another case, we referred our client to Islington Council's Housing department via their online form. We have chased up the case daily and found the client has been assigned a case worker and a reference number. However, after a week, and daily follow ups, the client has not only not been accommodated but not even been contacted by the council.

6. Accommodation is often wholly inadequate.

6.1. Accommodation offered by the Home Office is still often shared, even in the midst of the COVID-19 pandemic. In one illustrative case, a client of ours, who was identified as vulnerable due to their acute medical conditions, was placed in a shared room in NASS accommodation. They left after learning that, despite some of those they were sharing the accommodation with testing positive for COVID-19, they would still be required to share the room.

6.2 Frequently Home Office rooms are insanitary and adequate food is often not provided. In one case, our client, who had a lactose intolerance, was not provided with food that they could eat. Our client was left to survive in large part off the plain corn flakes provided at breakfast. This is in contravention of regulation 14 in the Health & Social Care Act (2008). Despite our client's complaints, nothing has been done by the accommodation provider to resolve this issue to date.

6.3 Councils also frequently do not provide sufficient food or support to our clients – often relying on mutual aid groups to do their work.

6.3.1 In one particularly egregious case, our client, an older homeless woman, was put up in accommodation by Greenwich council with no bedding and no food and in which facilities were shared with five other people. Our client was left freezing,

unable to sleep, and hungry – with no access to food for many hours. We had to source emergency food and bedding provision from their local mutual aid group.

6.3.2 In another case, a client of ours was placed in emergency accommodation by Haringey Council, but was not directed towards any subsistence provision. We had to source subsistence from local mutual aid groups. When inquiring about this with a member of staff at the Council, we were told that,

“The lunch we do Monday to Saturday is arranged by Homes for Haringey and the Rough Sleeping team. Mutual aid groups are being contacted to support people for top-up meals/extra local support.”

6.3.3 We replied stating that, in our view, everyone requires three meals a day as a basic standard - and as such, this should be part of the subsistence provision offered by councils. We requested further clarification on what ‘top-up meals’ means, which we assume is used to refer to breakfast and dinner on Mondays to Saturdays, and all meals on a Sunday. No clarification was given to our question. If we are correct in our assumptions, then we are deeply alarmed by how threadbare the support available to homeless and destitute people is.

6.4 The net result of this is that clients, who wish to self-isolate and help contain COVID-19, are forced out onto the streets either to escape insanitary rooms or in search of food and basic services.

6.5 Further, the lack of adequate subsistence provision by local authorities in effect outsources the responsibility for such provision to community and voluntary organisations. While it has been moving and gratifying to witness the recent outpouring of community action, it is not a sustainable nor secure means of attempting to plug holes in the social safety net.

6.5.1 Community and voluntary organisations do not have the training or adequate safeguarding to protect both themselves and others when supporting the homeless and rough sleepers, which can often be a distressing or complicated experience.

6.5.2 Community and voluntary organisations do not have the funds or resources in place to adequately meet the needs of vulnerable people such as the homeless and rough sleepers. Council inaction on subsistence provision in effect outsources a huge responsibility on individuals who do not have the same resources as councils themselves do.

7. Council’s use of outreach teams to locate rough sleepers are lacking and scarcely adequate:

7.1 Many councils rely on the charity Street Link for their outreach operations.

7.1.1 While Street Link is a useful charity, they are an insufficient replacement for an in-house council outreach team, with the funds and resources needed to expand its operations so as to effectively meet the demands of the current circumstances.

7.1.2 Street Link teams take 1-3 days - and often far longer - to reach the location at which an alert is sent. As such, Street Link outreach teams rely on those referred to them to remain in the exact location in which they were seen and they are required to be seen ‘bedded down’; when Street Link teams take many days to come, this is plainly not a realistic expectation.

7.1.3 In turn, the vast majority of Street Link referrals do not lead to our clients being found, let alone accommodated.

7.2 Further, there is an organisational disconnect between Street Link, which acts as a referral mechanism, and the outreach teams who go out to find homeless people to engage services with.

7.2.1 Several times we have been told by Street Link workers that they are 'separate' to the outreach teams that pick-up referrals. This means that urgent updates regarding location changes often are not communicated in time, as advocates such as ourselves are reliant on Street Link passing on updates to the outreach team.

7.2.2 Homeless and rough sleeping individuals are advised to call the Street Link general line to update any changes in location. This assumes that destitute individuals will have a charged phone able to make and receive calls for the three days it may take for a referral to be responded to. It also assumes that they will know the original reference number of the Street Link referral that was made on their behalf. This is not always the case, due to referrals most often being made by secondary advocates; often, the client's lack of email address to facilitate the sharing of the referral data with the client; and communication issues that complicate the client's understanding of the process of Street Link referrals.

7.3 Councils use of outreach teams is not limited solely to first-contact engagement with homeless and rough sleepers. In our experience, St Mungo's is used by either Street Link or local authorities as a first point of contact.

7.3.1 To our knowledge, Thames Reach workers are employed as administrative staff within council offices, such as the Housing Departments of Greenwich and Islington Councils.

7.3.2 However, their function in the case of urgent referrals is limited. In our experience, they are primarily placed to verify the eligibility of applicants for homeless services when phone referrals are made.

7.3.3 On one occasion, we were told by a Thames Reach worker at Greenwich Council that they 'were not part of the council' and 'had no authority to assess or make decisions on referrals'.

8. Some councils appear to only accommodate those who are rough sleeping for a few days at a time

8.1 In one case, our client, who was pregnant, was referred to Street Link in Lambeth.

8.1.1 This client was picked up that night and put into a hotel by Lambeth council.

8.1.2 A few days later, our client was told the period they were being accommodated for had ended and they were asked to leave.

8.1.3 We then made an urgent referral to Lambeth's safeguarding team. That night, our client was told they would be accommodated again but only for one more night.

8.1.4 The next day our client was made street homeless again and it took a full day of advocacy to get them accommodated by Lambeth.

9. Many in the private rented sector are at risk of soon being pushed onto the streets.

9.1 Since the lockdown, some of our clients - or the friends they are accommodated by - have lost their jobs and income. However, as they have the NRPF condition, they are ineligible for Universal Credit, furlough schemes, or council support.

9.2 Although the Government has stated that “no renter in either social or private accommodation will be forced out of their home during this difficult time”, the main mechanism it has introduced to implement this is a three-month delay for landlords to begin eviction proceedings. Further, although the Government has said that mortgage-holders, including landlords, can apply for a three-month pause in payments, there is no similar provision in place for renters. As such, landlords who use tenants’ rent payments for their mortgage are still able to demand rent payments - particularly as the three-month pause in mortgage payments is dependent on individuals making a successful application as opposed to a blanket moratorium.

9.2.1 There is no statute in place to suspend rent or mortgage payments, nor is there any mechanism to ensure that landlords comply with the Government’s intended objective that no renter be evicted during the coronavirus outbreak.

9.2.2 As such, individuals are still liable for rent and utility bills. In turn, they are left with no income and growing debt.

9.3 The result is that many of our clients are weeks away from eviction and street homelessness - especially those who do not have their own tenancy but stay at the residence of their friends.

9.4 In one typical case, our client lost their job owing to COVID-19 but did not qualify for any government assistance. This client still faces full rent and the payment of bills. This client has managed to raise this month’s rent by appealing to the charity of friends. However, it is unlikely our client will be able to do so again, and risks being made homeless once the government’s suspension of evictions ends.

Post-lockdown concerns and key recommendations

1. All those homeless, especially those with NRPF, will be evicted and made street homeless again: all councils we have interacted with have been explicitly clear that those with NRPF will be asked to leave accommodation as soon as lockdown ends.

1.1. This is of grave concern to us. If the homeless are evicted post-lockdown, but before the end of the pandemic, there will be few places other than the streets for them to turn.

1.2 We are particularly worried as we think that homeless shelters – especially those that provide shared accommodation – will not reopen soon after lockdown ends, due to fears of COVID-19 spreading within them.

1.3. We also fear that many homeless outreach services will not reopen for some time, leaving many homeless people unable to access food and basic services.

1.4 Moreover, we fear that evicting those who are homeless as soon as lockdown ends will pose a significant danger to public health. If those with NRPF are evicted – perhaps as early as May 2020 – they will turn to A&E waiting rooms, the streets, and other public places. Their renewed and sustained exposure to the wider public will pose danger both to themselves and to others.

1.5 To rectify this, councils must commit:

1.5.1 At the very least, to accommodate the homeless, including those with NRPF, the hidden homeless, ‘sofa surfers’, and the undocumented, for the full duration of lockdown, including partial lockdown.

1.5.2 To accommodate those homeless, including those with NRPF, for the full duration of the COVID-19 pandemic.

1.5.3 To accommodate those homeless, including those with NRPF, after the COVID-19 pandemic ends.

1.6 In addition, the Secretary of State for the Home Department should suspend or abolish the NRPF condition with immediate effect. It acts as a legal barrier preventing often vulnerable and destitute migrants accessing essential services.

2. Councils have no ‘move-on’ plan in place for the homeless they are accommodating:

2.1 While councils have taken responsibility for housing many homeless people, including those with NRPF, the council has stated that their help is strictly limited to the duration of lockdown.

2.2. We fear that the homeless will be abandoned again once lockdown ends.

2.3 In turn, councils must develop plans to help those who are homeless following lockdowns, including those with NRPF.

3. Those with NRPF will be deported, removed or detained at the end of lockdown:

3.1 The committee will know that the process to regularise one’s status is often long and arduous. We are deeply worried that those who are still in the process of trying to regularise their status will be detained or deported as a result of having their whereabouts known – due to taking government/ council accommodation.

3.2 Councils must be allowed to commit to not sharing data with the Home Office and not do so.

3.3 Those without status must be given concrete assurances that attempting to comply with social distancing guidelines will not result in their deportations or detention.

4. Those in the private rented sector who fall into arrears will be evicted when the government’s suspension on evictions ends.

4.1 We know that many of our clients with NRPF are likely to fall into arrears with their landlord. With no job, and no access to government schemes, we see few ways that such individuals will be able to pay back such arrears.

4.2 In turn, we fear that when the suspension on evictions ends, such individuals will be made homeless en-masse.

4.3 To rectify this:

4.3.1 The Secretary of State for the Home Department should suspend or abolish the NRPF condition with immediate effect.

4.3.2 Utility bills should be suspended for the duration of lockdown.

4.3.3 Rent should be suspended for the duration of lockdown.

5. Council’s budgets for dealing with homelessness/ their stock of accommodation for the homeless are either exhausted or will soon be exhausted:

- 5.1 We know that some councils, like Camden and Westminster, are already claiming that their accommodation is full; in turn our clients are placed on waiting lists indefinitely. We fear that this situation might soon be the norm among councils, if it is not so already.
- 5.2 In light of the fact that there is little reason that those currently accommodated should leave their accommodation, we do not believe the current housing stock / budgets available to councils are sufficient. Indeed, it is entirely unacceptable if housing the homeless has become a zero-sum game.
- 5.3 Furthermore, the COVID-19 pandemic has revealed that the extent of homelessness within each local authority is far greater than local authorities previously believed. In particular, many 'sofa surfers' have run out of places to stay – due to friends abiding social distancing guidelines - and have been pushed on to the streets; in many areas this has exposed the extent of 'hidden homelessness' within local authorities. The statistics of the rates of homelessness do not capture the full picture. Councils must not be relying on numbers that are inevitably lower than the true incidence of homelessness and rough sleeping.
- 5.4 In turn we recommend:
- 5.3.1 Councils' homelessness budgets are dramatically increased, with immediate effect.
 - 5.3.2 Councils immediately release or acquire more accommodation stock to accommodate the homeless during the pandemic – whether hotel rooms, houses, or hostels.
 - 5.3.3 Councils release or acquire more accommodation stock to house the true number of homeless people after the pandemic subsides.

Submitted by Haringey Migrant Support Centre, May 2020.

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