

Review of Severe Weather Emergency Protocol (SWEP) response in London during the winter of 2020/21

1. Introduction and background

The challenge of ensuring a comprehensive severe weather response to street homelessness in London during winter 2020/21 was unprecedented due to the added risks of COVID-19. This challenge followed the 'Everyone In' response to the pandemic earlier in 2020, and due to the ongoing risk of transmission communal sleeping spaces, previously commonly used for SWEP, were still deemed unsafe. Instead, a heavy emphasis was placed on securing single room accommodation which could be safely used during severe weather. This significantly altered London's SWEP response compared to the preceding winters. However, the key principle remained - that when temperatures drop to or below freezing in London, people sleeping rough should be supported to access safe, warm emergency accommodation.

This high-level review sets out to consider how well SWEP was implemented in the midst of the pandemic during the winter of 2020/21. It reviews the overall scale and characteristics of the response, the activation process, the longer-term outcomes achieved and the implications of the changes in accommodation models. Finally, there are recommendations for actions the GLA should take for the coming winter, based on learning from 2020/21. The main sources of information for the review are CHAIN data on SWEP stays and subsequent outcomes and feedback collected from outreach teams and local authority rough sleeping leads. In the main, 2018/19 is used as the year of comparison. This is because 2019/20 had an unusually small number of SWEP days and was enveloped by the 'Everyone In' response towards the end of the winter, which likely distorted outcomes.

2. Summary of SWEP response in winter of 2020/21

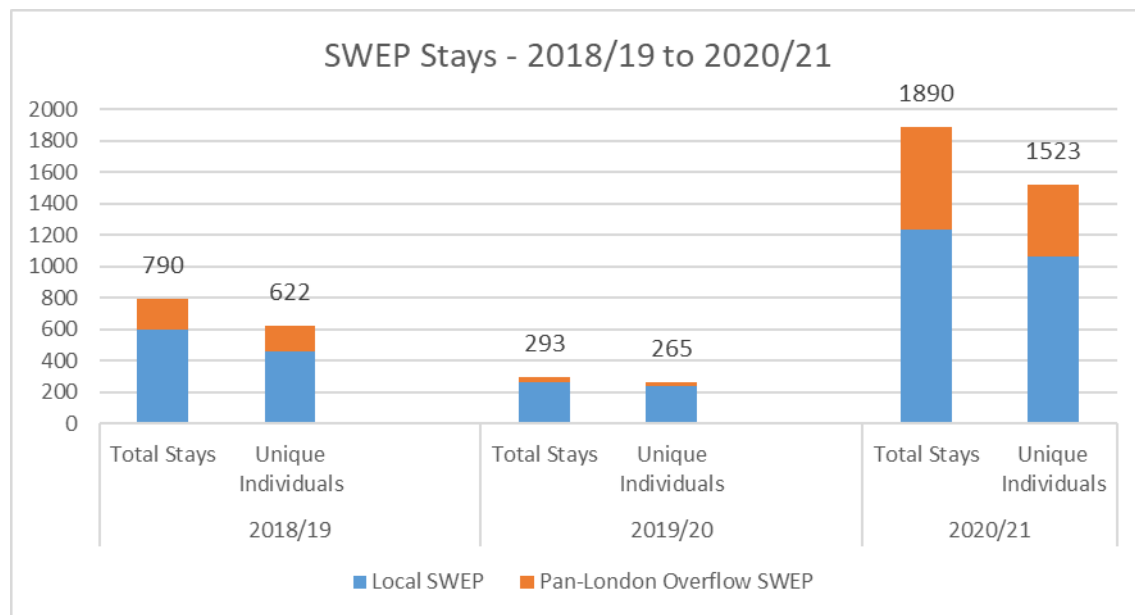
In the winter of 2020/21, pan-London SWEP was active for a total of 35 nights. There were 10 separate SWEP periods, these ranged in duration from two to ten consecutive nights. There were a greater number of freezing nights than in the winters of 2018/19 and 2019/20, which had 24 and 10 nights respectively in which SWEP was active across London. The first night of SWEP was 7th December and the last was 6th April. The spread was as follows:

| Month | Nights of SWEP |
|----------|----------------|
| December | 5 |
| January | 14 |
| February | 10 |
| March | 3 |
| April | 3 |

As normal, the majority of SWEP accommodation was provided by London's borough councils, with the GLA's Pan-London overflow SWEP beds available to outreach teams if their local provision was full. The London 2020/21 SWEP guidance asked that boroughs provide at least the same level of SWEP provision as in the previous year and that wherever possible, capacity should match the anticipated level of need in the area. It stated that the absolute minimum capacity which should be provided by councils was space for five people or 10 people for those

boroughs represented on the Mayor’s Life Off the Streets Taskforce. In practice, the majority of boroughs delivered significantly more capacity than this.

In total, there were 1,890 total SWEP stays recorded on CHAIN (1,237 in boroughs’ local SWEP accommodation and 653 in Pan-London overflow SWEP) over the course of the winter. Some people had multiple SWEP stays, meaning the number of individual people who had a SWEP stay recorded was 1,523 (1,064 in local SWEP accommodation and 459 in Pan-London overflow SWEP). Both these numbers were significantly higher than in previous years.



The number of people accommodated was also considerably higher than the need projected by boroughs at the beginning of the winter. Local authorities believed an aggregate 1,008 people would require SWEP provision, but the final total was an almost 50% higher. Despite this, London was able to respond to the need during the winter. At the beginning of the season, with the assessed need of 1,008 spaces, there were only 509 beds planned by the boroughs. This meant that across the city, it was predicted there would be a large shortfall of planned provision against the anticipated demand.

As it transpired, boroughs were able to provide a significantly larger amount of SWEP provision than they first envisaged. The primary reason given for this was funding from central government made available during the winter which enabled both councils and the GLA to scale up provision. Boroughs were also able to use a greater number of beds than first anticipated in existing hotels procured as part of the ‘Everyone In’ programme. Another factor raised by some councils was that the more flexible approach to accommodating people sleeping rough, which was still council policy at the time due to the ongoing Covid-19 risk, meant that it was easier to authorise emergency accommodation placements during SWEP periods than it otherwise would have been.

With the greater than predicted SWEP provision, boroughs were able to place most people who needed assistance in their local beds. With Pan-London overflow provision available whenever local provision was full, there was always access to SWEP beds for people seen by London’s outreach teams. This was a notable success in very challenging circumstances. However, local authorities have highlighted the risk that without the repetition of some of these factors, most

importantly the additional funding from central Government, there could be a significant shortfall in beds in 21/22.

3. SWEP activation procedure

As in previous years, the GLA drew up an activation procedure, which was shared with boroughs at the start of the winter (See Appendix A). This sets out how SWEP will be activated for London by the GLA. This was largely unchanged from the winter before, with SWEP triggered when temperatures dropped to freezing anywhere in London. The winter's weather differed from previous years in that there were a much greater number of:

- short SWEP periods (only one or two nights of freezing temperatures)
- SWEP periods with borderline temperatures (below 0°C in only a small minority of boroughs)
- significant last-minute changes to forecast temperatures e.g. temperatures falling to below 0°C after having been previously forecast to not reach freezing ¹

The weather conditions created some additional challenges for SWEP activation. However, the vast majority of boroughs and outreach teams still believed that the activation procedure had worked well overall. Responses included that the messaging had been consistent, that all partners were kept regularly updated and that the early warning notifications had enabled services to plan accordingly. All councils were operating local SWEP protocols during the pan-London activation period and some boroughs flagged that they even went further than this - triggering earlier or extending the SWEP due to local policies or circumstances.

However, there were also some issues raised. It was noted by some that activations and deactivations happening in quick succession, and sometimes at short-notice, due to the changing weather can prove difficult to manage. Furthermore, there were occasions when a local authority would spend time and resource preparing for an anticipated SWEP period which then did not materialise because the temperatures had risen. There were concerns raised about the two occasions in which the GLA activated or deactivated SWEP on a weekend. This unusual step was taken due to temperatures which were forecast to dramatically change part-way through a bank holiday weekend and in the context of finite SWEP accommodation. Whilst pre-warning was provided, two local authorities stated this was still an unreasonable expectation of boroughs.

It was also raised by councils that there were more SWEP periods than normal when it had not been freezing in their local area, as temperatures of 0°C had been confined to a small number of outer London boroughs. It was said by some that this meant the financial cost of providing SWEP was becoming more difficult to justify internally. Others raised that it was confusing for staff, people sleeping rough and for local messaging that SWEP would sometimes be deactivated when locally it was still just as cold (or even colder) than when it had been triggered. Another theme was that people were less likely to accept SWEP offers when it was warmer locally, therefore, it was not felt that these periods were as effective or such a good use of time and resources.

¹ The less reliable and more changeable weather forecasts were in-part due to the impact of COVID-19 on weather data collection and modelling services.

4. Pan- London Overflow SWEP

As in previous years, Pan-London Overflow SWEP accommodation was open to outreach teams when local SWEP accommodation was full. This utilised beds in the existing hotels which had been procured as part of Everyone In and two additional sites secured specifically for use during SWEP. In total, 450 people were accommodated in pan-London overflow SWEP, significantly more than in previous years. Whilst everyone eligible who was referred to overflow provision was successfully accommodated, later in winter there were increasingly few voids remaining in the hotels. As this accommodation model is much less scalable than the previous shared sleeping sites, this presented a genuine risk, narrowly avoided, that overflow SWEP would have to close to referrals.

This ongoing availability of overflow SWEP beds was at particular risk when there was an unusually late period of SWEP in early April 2021, due to the fact some of the SWEP accommodation had begun to demobilise. For this period, overflow provision was still made available to any outreach teams unable to access local beds, however, the GLA communicated to councils that anyone placed by outreach teams would be referred back to the referring borough within 72 hours, which would be expected to assume responsibility for ongoing accommodation and support provision. Whilst many boroughs agreed with this approach, as it safeguarded the availability of emergency overflow beds in exceptional circumstances, some others expressed concerns that they could not commit to providing ongoing accommodation in circumstances such as people without eligibility for benefits, meaning they in effect could not refer into pan-London overflow SWEP.

Over the winter period as a whole, people from at least 27 of London's boroughs were referred into Overflow SWEP. There are also almost 150 people for whom CHAIN records can't determine where the person was sleeping rough when referred, meaning the total number of boroughs may be higher still. This suggests there were very few boroughs whose local provision did have sufficient capacity for all of the need across of winter. There was significant variation in how many people were referred to pan-London SWEP from different boroughs. For those cases where a borough of referral can be identified, the median number of referrals from each borough was 12. However, there were four boroughs from where over 30 people were referred and one borough from where almost 90 people were referred. This indicates more work is required to ensure local SWEP provision is better matched to need.

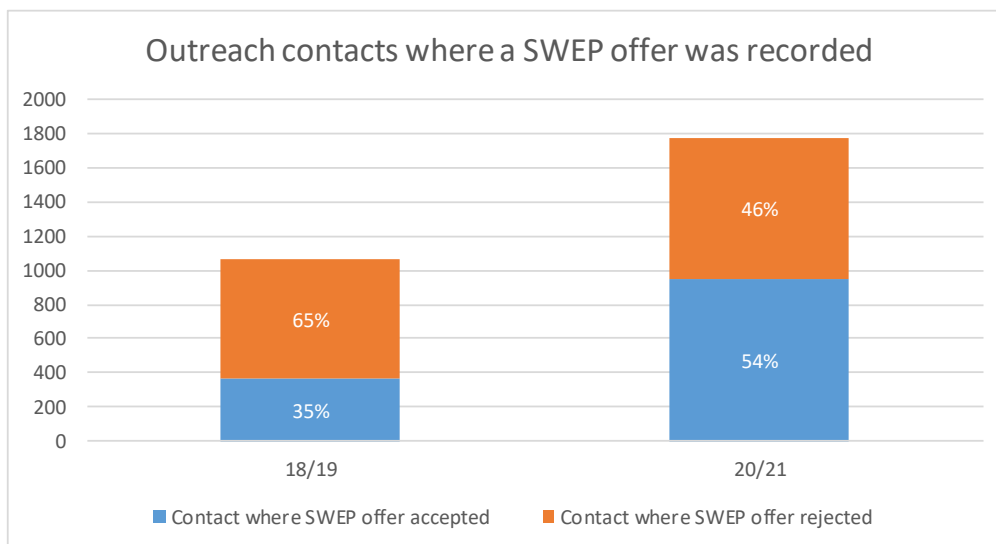
Outreach teams fed back that the referral process for pan-London Overflow SWEP had worked well and people were accommodated when needed. However, it was mentioned that the referral form could be time consuming during busy nights. The St Mungo's team coordinating and staffing Pan-London SWEP stated that from their perspective, the established referral process generally had been a success over the winter of 20/21. There were some areas for improvement highlighted though. Firstly, there was an increase in referrals from outreach teams in cases where the local SWEP provision was not necessarily full, but there were barriers to accessing this. This was a particular issue in certain boroughs and predominantly occurred in cases where SWEP beds were accessed through the council's out-of-hours service, from which there was sometimes a slow, confused or inconsistent response.

5. Uptake of SWEP accommodation

The colder weather, and therefore more nights where SWEP was active, clearly contributed to the greater number of people accessing SWEP provision. However, even when considering the length of SWEP activation, 2020/21 still saw proportionally a greater number of people accommodated. When compared to 2018/19 for example, there were 33% more nights of SWEP, but 145% more unique individuals accommodated. This is despite the fact that the total number of people seen rough sleeping during the winter period was near identical in the two years.

There are some possible explanations for the increase. One is that as the GLA and CHAIN have continued to promote the importance of recording SWEP stays on the CHAIN database, this has become more consistent. Recent data may therefore be more accurate than in previous years. Another is that the SWEP offer was more attractive in 20/21 due to the overwhelming use of single occupancy accommodation (including many hotels). Previously, SWEP provision from both boroughs and the GLA tended to utilise shared shelter-style sleeping arrangements. A number of outreach teams and local authorities highlighted that this change encouraged people to take up the offer – which is discussed further in Section 8.

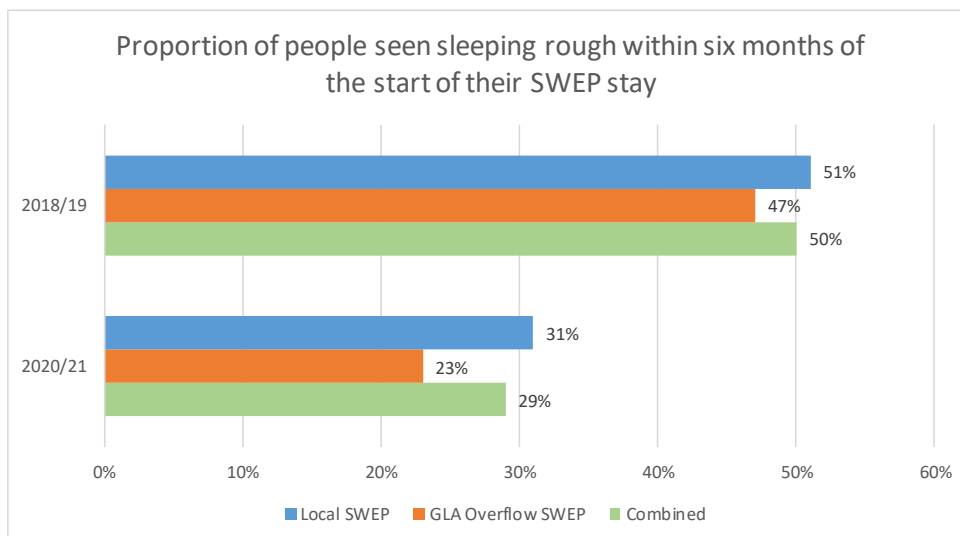
There was also feedback that the ongoing Covid-19 risk created a heightened sense of anxiety, and thus an urgency to come inside, amongst people sleeping rough. This could have contributed to the take up of SWEP accommodation amongst people who otherwise would have not accepted the offer. Regardless of which of these factors had the biggest impact, acceptance rates were significantly higher than in previous years. In 2020/21, over half of recorded outreach team contacts offering SWEP were accepted. This compares to just over a third in 2018/19.



However, it should not be overlooked that the number of instances in which SWEP was refused is still too high, with over 800 outreach team contacts where someone declined an offer of SWEP accommodation. An area of concern highlighted was the number of people with mental health issues who declined offers. It was raised by outreach teams that people with mental health issues declining SWEP offers was a particular issue and more consistency was needed across London on the approach to this challenge and access to mental health assessments for people sleeping rough.

6. Longer-term outcomes

As in each year since 2018/19, the 'In for Good' principle has been used in Pan-London Overflow SWEP and has also been part of the SWEP guidance for all London boroughs (See Appendix B). This means that no one should be asked to leave SWEP accommodation until there is a support plan in place to end their rough sleeping, regardless of whether temperatures have risen. In 20/21, 71% of people were not seen sleeping rough again within 6 months of the start of their SWEP stay. This indicates that being accommodated during SWEP did end their rough sleeping for the longer-term. This is a notable increase compared to 2018/19, when half of people returned to sleeping rough within six months of their SWEP stay.



There was some significant variation between locations in the rates in which people returned to sleeping rough after their SWEP stay: 31% of people for London as a whole; 23% of pan-London Overflow SWEP; and in-borough SWEP accommodation ranged from 0% to 75% (although for some, the sample size was less than five people). This indicates that application of the of the In for Good principle is having inconsistent results in different areas. However, across London, almost all councils had a smaller proportion of people returning to sleeping rough after their SWEP stay than in 2018/19.

Feedback from local authorities is that the provision of largely single occupancy accommodation meant that, assuming funding was available, they were always able to extend people's accommodation until a longer-term plan was firmly established. This contrasts with many SWEP spaces in previous years, where shared and often makeshift bed spaces meant that extending this accommodation (and persuading people to stay) until an alternative route off the street was secured was challenging.

In 20/21, even if someone could not stay in the particular location they were accommodated during SWEP, most boroughs still had a greater than normal level of emergency accommodation funded into Q1 21/22, meaning that people could be transferred elsewhere. This was the case with pan-London Overflow SWEP, whereby people with ongoing casework from the SWEP specific sites could be transferred to other hotels when they closed. Some councils also highlighted that single-occupancy accommodation provided a more stable and conducive

environment to start working with someone around their longer-term options and this is discussed further below.

7. Accommodation models

Due to the ongoing risk of Covid-19 transmission, much of the usual SWEP provision was not used. Shared sleeping sites, such as communal spaces in day centres, hostels, faith-based shelters and so forth were replaced by self-contained options such as hotels and B&Bs. However, despite efforts to ensure that all accommodation was COVID-secure, some outreach teams raised concerns that certain SWEP locations still presented a high infection risk, such as where large numbers of people were sharing bathroom facilities. On balance, the move to single occupancy accommodation was felt by councils and outreach services to be positive, however, there were both advantages and disadvantages raised.

Numerous partners believe the increased use of self-contained accommodation had various benefits and contributed to more successful outcomes. Aside from the public health benefit of minimising the risk of COVID transmission, it was found that more people were accessing SWEP compared to previous years. Outreach teams reported that in previous winters, the provision of large shared spaces was a key factor in some people declining a SWEP offer. As well as encouraging people to take up the SWEP offer and stay for the duration, it was noted that people assisted during SWEP felt the accommodation model now offered more dignity. This in turn helped services build greater rapport with these people, meaning they could assess and support them more effectively.

There were some drawbacks, however. It was not universal that engagement with support was better than in previous years. It was also raised that the model made it much more difficult to assess and support people who were reluctant to work with staff, as people could choose to simply stay in their rooms. As a result, there was a subset of people with whom they failed to establish any meaningful communication at all during their SWEP stay. Furthermore, whilst some boroughs used one or two larger hotels or B&Bs, others accommodated people in various emergency accommodation sites scattered throughout the borough and surrounding area. This meant they were not able to provide the same level of onsite support as they did in their previous single site shelter models. Outreach teams raised that this presented potential safety and safeguarding issues.

Many boroughs communicated real challenges in financially sustaining self-contained accommodation. Not only were room rates significantly more expensive than previous low (or no) cost communal sites but local authorities also noted that per person, greater numbers of support staff and security were needed to ensure that people are kept safe, compared to in a communal space. As a result of these increased costs, boroughs raised concerns about the level of SWEP provision they would be able to afford to deliver in 21/22, without moving away from self-contained accommodation. This issue could be compounded by greater difficulties in sourcing suitable hotels and B&Bs as many of these sites return to normal use following the lifting of lockdown. Boroughs raised serious concerns that even where budget is available, they might struggle to find sufficient self-contained SWEP beds within, or within reasonable travelling distance of, their borough.

8. Recommendations

Overall, London responded well to the SWEP need in winter 2020/21, especially when considering the challenges the city was faced with. This is testament to the hard work and dedication of partners, including outreach services, local authorities, central government, staff teams in SWEP accommodation and many more. However, there were issues arising in 2020/21, which suggest action will be needed this year to ensure SWEP is a success in the winter of 2021/22.

The GLA should:

SWEP accommodation and capacity

- Undertake analysis of projected need and planned SWEP provision, in partnership with London Councils and DLUHC, to help ensure that London has sufficient SWEP capacity for the winter of 2021/22
- Once again use single-occupancy accommodation for pan-London overflow SWEP, except in cases where people have been sleeping rough in existing 'bubbles'
- Encourage all boroughs to work with their local public health teams to ensure that local SWEP accommodation is COVID-secure

London SWEP guidance

- Remove the stated number of minimum beds for each borough, to ensure that all councils are focused on matching SWEP capacity to anticipated need
- Recommend that all boroughs should thoroughly road test that local SWEP options can be easily accessed out-of-hours, including by the Rapid Response outreach service

Activation procedure

- Clarify that SWEP will only ever be activated or deactivated on a weekend/bank holiday in very exceptional circumstances and in consultation with boroughs

SWEP uptake and outcomes

- Raise the issue of assessment and support for people with mental health issues declining SWEP offers during cold weather with key stakeholders (ICS leads, the Homeless Health Leadership and RAMHP Community of Practice) and liaise with EASL regarding option of additional training
- In partnership with London Councils, work with boroughs to establish a consistent understanding of the 'In for Good' principle and share good practice around implementing this

Pan-London Overflow SWEP

- Work with St Mungo's to review the pan-London Overflow SWEP referral process, to ensure that the referral form is as streamlined as possible, whilst still collecting all the necessary information

APPENDIX A

Pan-London SWEP activation procedure 2020/21

This document details the process which will be followed for activation of SWEP in London during winter 2020/21. It should be read alongside the GLA's 'London SWEP Guidance 2020-21' document.

Note that 'activation' refers to opening of SWEP shelter to new referrals, not whether shelter remains available to those already booked in (see the "In for Good" principle). 'Deactivation' relates to closing of SWEP to new referrals only, and is not a directive for those already booked in to be asked to leave.

Forecasting and advanced warnings

GLA officers in the rough sleeping team already monitor weather forecasts throughout the winter as a matter of course. In addition to manual monitoring, from November to March the Met Office provides daily bespoke 3-day forecasts to the team.

The procedure (below) includes a daily deadline of midday for activation of SWEP for good reason; services take time to mobilise, and safe effective mobilisation is not always possible at short notice. However, the principles of SWEP activation are reliant on accurate forecasting of temperatures.² It is recognised that the situation could arise where measured temperatures are significantly different to those forecast, or where the forecast temperature changes significantly at short notice – mitigation for these circumstances has been included in the below.

In the event that measured temperatures are significantly higher or lower than those that were forecast there is, unfortunately, little that can be done as this will only become apparent retrospectively. If it is found that this occurs frequently, or the impacts of this phenomenon are severe, this will be taken into account when reviewing the current SWEP process and alternative triggers may be considered.

SWEP activation procedure

Preparation

1. GLA will provide all local authorities with this procedure document and separate SWEP guidance.
2. GLA will request SWEP details of all local authorities, including planned provision, and key contact details.

Monitoring

3. GLA officers will monitor daily temperatures using a bespoke 3-day Met Office forecast.

² Met Office overnight minimum temperature forecasts are accurate to within $\pm 2^{\circ}\text{C}$ 86.5% of the time.

4. If the forecast is for temperatures of 0°C or below within the next three days in any part of London,³ the GLA will send an advanced warning email to London boroughs.
5. If the daily Met Office report (received at 07:30 every morning) forecasts a minimum temperature of 0°C or lower within the next 24 hours GLA officers will activate SWEP for all of London (go to step 9 for activation).
6. If the daily Met Office report (received at 07:30 every morning) forecasts a minimum temperature of 2°C or lower but above 0°C, this will prompt a specific additional round of manual checks by the team at 11:59 and again at 16:30 on that day⁴.
7. If the forecast temperature has fallen to or below 0°C by 11:59 GLA officers will activate SWEP (see step 8 for activation).
8. If the forecast temperature is still above 0°C at 11:59 but has fallen to or below 0°C at the 16:30 check (and so after the midday deadline for normal activation), officers will consider whether the forecast of 0°C or below is localised (one or two boroughs) or widespread.

If localised, GLA will

- Contact those specific boroughs affected to alert them of the changed forecast
 - i. Explain the reasons that pan-London activation was not triggered
 - ii. Request that they take reasonable steps to activate SWEP locally,⁵ acknowledging that this may result in less robust provision than would be possible with adequate notice
 - iii. Confirm that overflow SWEP will be available
- Mobilise overflow SWEP as far as is possible at short notice

If widespread, GLA will

- Contact all boroughs to alert them of the changed forecast
 - i. Explain the reasons that pan-London activation was not triggered
 - ii. Request that they take reasonable steps to activate SWEP locally, acknowledging that this may result in less robust provision than would be possible with adequate notice
 - iii. Confirm that overflow SWEP will be available
- Mobilise overflow SWEP as far as is possible at short notice

Activation

9. If the forecast temperature has fallen to or below 0°C before 11:59 the GLA will trigger a pan-London activation of SWEP.⁶

³ If the threshold is reached on a Friday, or by Friday the forecast is that the threshold will be reached during the weekend, SWEP will be activated and remain active until the following Monday morning regardless of changes in temperature.

⁴ In the event that these conditions are met on a Friday the following procedure will apply throughout the weekend.

⁵ This could include, for example, targeted outreach for those known to be most vulnerable.

⁶ In instances where temperatures are close to 0°C and other factors are in play, such as heavy snowfall or 'feels-like temperatures', GLA may also activate SWEP. In any marginal or unconventional situations GLA may

10. GLA officers will email the SWEP contacts network with an alert that SWEP has been activated. Steps 6 and 7 notwithstanding, this will be done by midday at the latest.⁷
11. The lead contact from each borough, or a nominated deputy, will confirm receipt of the alert and activation of local SWEP plans by return email to the GLA.
12. Lead contacts in each borough will be responsible for cascading activation notification to local services and partners.

On-going activation

13. This process will repeat, with daily alert messages confirming that SWEP remains active as long as minimum forecast temperatures remain at or below 0°C in any part of London. Daily confirmations from borough leads are not required.

Deactivation

14. If the forecast is for minimum temperatures above 0°C in all parts of London, the GLA will take the decision to deactivate SWEP across all of London
15. GLA officers will email the SWEP contacts network with an alert that SWEP has been deactivated, and a reminder of the “In for Good” principle. This will be done by midday.

If a council opens local SWEP earlier, or for longer, than pan-London activation this is of course welcome, local leads are simply requested to notify GLA.

This procedure has been developed alongside services and local authorities and should be incorporated into local SWEP plans. Where an element of this procedure conflicts with local SWEP planning the authority is encouraged to contact the GLA at the earliest opportunity (roughsleepingcommissioning@london.gov.uk).

consult with those borough leads who can be contacted before making a decision on activation or deactivation. In the unlikely event that temperatures reach 0°C and no lower in one isolated location and are not expected to be near 0°C in any other part of the capital in the near future GLA may take the decision not to activate SWEP at a pan-London level.

⁷ If no alert is received by midday it should be assumed that SWEP is not being activated, however in conditions that are considered marginal a message to confirm that SWEP is not being activated may be sent.

APPENDIX B

Guidance for winter Severe Weather Emergency Protocol (SWEP) in Greater London 2020/21

This guidance is produced for London local authority rough sleeping lead officers and their colleagues involved in the provision of services for people sleeping rough in the capital.

This guidance should be read in conjunction with the Homeless Link *Severe Weather Emergency Protocol and Winter Provision Guidance*, which provides advice for local authorities nationwide. Reference should also be made to the Greater London Authority (GLA)'s *Review of Winter SWEP 2017/18* which includes multiple best-practice recommendations to support the successful delivery of **SWEP**.

1. Background

SWEP is an emergency humanitarian response to severe weather conditions, the primary aim of which is to preserve life.

Since winter 2017/18, the GLA has provided guidance for London's councils regarding local **SWEP** plans. This guidance, which has been agreed by all 33 London councils, introduced a trigger point for **pan-London SWEP activation** of 0°C on any one night to ensure consistency across the capital.

Each borough is expected to make its own local **SWEP** provisions for those sleeping rough in the area. The capacity of local provision should be informed by an assessment of need undertaken at the borough level. The nature of provision should take into account the factors included in the GLA's 2017/18 **SWEP** review and Homeless Link's current guidance

In addition, the GLA funds '**overflow provision**' accessible by any London borough when local **SWEP** provision reaches capacity.

2. Terminology

SWEP is Severe Weather Emergency Protocol

Activation is the opening of SWEP to new referrals

Deactivation is the closing of SWEP to new referrals

Pan-London activation is the centrally coordinated activation of SWEP by the GLA across all London boroughs and including GLA overflow provision

Overflow provision is GLA-funded SWEP provision accessible by all London boroughs when local provision reaches capacity

In for Good is the principle under which once a person is supported to access shelter or accommodation they are not asked to leave until there is a support plan in place to end their rough sleeping.

3. Guidance on borough SWEP provision

The Mayor asks that all London councils adhere to the following minimum standards for **SWEP**:

- councils should continue to ensure at least the same level of **SWEP** provision as in previous years and councils represented on the Mayor's No Nights Sleeping Rough Taskforce should provide capacity for a minimum 10 rough sleepers in severe weather. Other boroughs should provide a minimum capacity of five; and
- wherever possible local **SWEP** capacity should match the anticipated level of need in the area;
- while **SWEP** may be provided in a variety of settings, each council should ensure that their accommodation can be easily accessed from across the borough (by foot, public transport, or SWEP-specific arrangements and by both clients and the services working them);
- **SWEP** for every council across London will be triggered and activated when any part of the capital is forecast to be 0°C or lower overnight. The GLA will coordinate this **pan-London activation of SWEP**;
- councils will commit to implementing the 'In for Good' principle. This means that once someone has accessed **SWEP** shelter, they are sheltered/accommodated until a support plan is in place to end their rough sleeping - regardless of whether the temperature has risen above 0°C^{8,9}.

Councils should prepare for the need for day-time **SWEP** provision in the event of exceptionally prolonged or extreme cold weather. For example, this could be done by arranging 24/7 access to shelter or by working with local partners to extend opening hours or capacity in local day centres.

Councils with local protocols that already exceed these guidelines should, of course, continue operating their current good practice, local leads are simply requested to notify GLA where local provision is available outside of pan-London activation periods.

SWEP is an emergency response, and as such it is expected that councils will work together in that spirit of cooperation. Specifically, providing shelter should not be considered as accepting a local connection or constitute a relief duty.

4. COVID safety

The COVID-19 pandemic has meant that the nature of service provision, and the specifics of how services are operated have had to be reconsidered.

⁸ A support plan will be considered to consist of an assessment of needs and eligibility, a service offer, and a nominated lead support agency.

⁹ It is recognised that some people will have very limited options due to issues outside of the local authority's control; for this reason it is expected that local authorities will work towards this goal, rather than being able to guarantee its delivery in every case.

Historically, a large proportion of **SWEP** provision has been through the use of shelters and communal spaces in commissioned services. Due to the increased risk of transmission, it is the GLA's position that only self-contained accommodation should be used.

If local authorities take a local decision to use shared sleeping spaces this should be considered only as a last resort, when all options to provide self-contained have been exhausted.

In the event that self-contained **SWEP** provision is not sufficient to meet the expected level of need, self-contained spaces should be prioritised for those people considered to be clinically vulnerable, or extremely clinically vulnerable, to COVID-19. The GLA has worked with colleagues in health to develop a COVID Risk Assessment which has been distributed to all outreach teams and is available on the CHAIN system; this may be a useful tool for assessment and prioritisation purposes¹⁰.

In the event that shared spaces are deemed to be necessary as a last resort, councils and service providers should refer to the MHCLG [Operating Principles](#) to ensure that risks are mitigated as far as is possible.

London-specific guidance and resources for the safe operation of homelessness services during the COVID-19 pandemic can be found on the [Healthy London Partnership website](#).

National guidance for how to operate hostels and similar services in a COVID-safe manner is [available here](#).

In any case, councils should inform local Public Health Teams of planned provision and ensure that appropriate outbreak management plans are in place.

When implementing the 'In for Good' policy, consideration should be given to the on-going COVID-19 risks for the specific type of **SWEP** provision being used. In cases where shared sleeping spaces are used it may be preferable not to implement 'In for Good', and to close such high risk sites as soon as **SWEP** is deactivated – local discretion is advised in these decisions.

5. Overflow SWEP provision

The GLA funds **overflow SWEP** provision. Once capacity is full within a given council's individual **SWEP** provision, **SWEP overflow provision** will be available for referrals from that council.

When **SWEP** is active, the SWEP coordinator for an area has the responsibility for notifying St Mungo's at swep@mungos.org and the GLA at roughsleepingcommissioning@london.gov.uk when their emergency accommodation is close to capacity and **overflow provision** may be required. Where there is capacity within the borough's own emergency provision, it is expected that all rough sleepers will be

¹⁰ NB that other, non-COVID, vulnerabilities should also be considered.

accommodated there, rather than in the GLA's **overflow provisions**. Where possible, notification of anticipated need should be made by midday to allow the **overflow provision** to prepare.

Arrangements for access to **overflow SWEP** will be circulated to Local Authority Rough Sleeping Leads along with **SWEP** alerts if/when **SWEP** is activated.

As usual, the GLA will collate information from boroughs of their key contacts and planned capacity.

6. Monitoring

All councils should record the number of people supported through their **SWEP** and share this aggregate information with the GLA, for each activated period.

Councils should also, wherever possible, use CHAIN to record local **SWEP** stays and monitor the use of their **SWEP** provision. This should include the numbers accommodated each night and the demographics and support needs of those using the emergency spaces. This will allow a comprehensive evaluation of **SWEP** provision, inform future provision, and enable further improvements to the protocol in following years. The CHAIN team can provide more information about this at ChainHelpdesk@MUNGOS.ORG .

It is, however, recognised that a requirement to record details on CHAIN can, in some instances, be a barrier to people accessing **SWEP**. So, while CHAIN recording is strongly encouraged it is not an absolute requirement.

If you have any questions regarding this document, please contact:

roughsleepingcommissioning@london.gov.uk.