

Queries around new guidance for hostels / rough sleepers published 30.10.20

Please see queries raised by providers and responses from Cambridgeshire & Peterborough Public Health team.

Q Guidance states early on that *face coverings must be worn by residents and staff when in communal indoor spaces in hostels, unless exempt for health, disability or other reasons*, but a later section states that staff only have wear face coverings in areas open to the public. The statements don't match - could clarity please be provided so providers know what they should be instructing staff to do?

A We believe this reflects the fact that there may be other measures in place to protect staff in certain areas of work within a hostel, such as office areas. It reflects the law which states "*face coverings must be worn in public areas in hostels*". We support the wearing of face coverings by staff and residents in communal areas where they are likely to meet other members of staff or residents.

Q New section regarding those who are '*clinically vulnerable*' appears to be suggesting that these individuals should be accommodated in alternative accommodation (if self-contained facilities are unavailable on-site). Is this an option that will be available? And if it is who is responsible for ensuring this provision is available? Does Public Health deem a hotel to be safer than a hostel for these individuals?

A Guidance is advisory on this and states:
Commissioners and providers of hostels for people experiencing homelessness and rough sleeping should protect residents who are clinically extremely vulnerable. This may mean:

- *prioritising single rooms and restricting the sharing of bathroom facilities*
- *considering accommodation options other than the current hostel of residence*

An earlier section of the guidance states:

Local providers will need to make an assessment on which areas of this guidance are most relevant for their particular circumstances and setting. Factors determining this could include the extent to which any facilities are shared, and the staffing set up in the accommodation.

Hence, we believe this is dependent on the setting and the availability of other options there and further afield. Ideally residents who are clinically extremely vulnerable should be somewhere where they can best avoid exposure to other people, they should not have to share facilities with people with suspected or confirmed COVID-19 or be placed adjacent to them. It is not possible to say which is safer as it will depend on the availability of suitable facilities not whether it is hotel or hostel and of course engagement to support adherence.

Therefore a hotel may be safer than a hostel if it has the facilities for the person to be self-contained, but will it provide the necessary support.

The Guidance indicates what is understood to be the best options for protecting extremely vulnerable individuals. However how these recommendations are accommodated locally will be determined by local decisions.

Q If a scheme is classed as a household e.g. smaller shared houses/projects, does the mask rule still apply in shared areas?

A The law states face coverings must be worn in public areas in hotel and hostels. Households are essentially considered to be bubbles and the facemask wearing would depend on whether for example the small shared house function as household, for example not mixing with other households.

Q Will it be acknowledged that projects will only be able to advise residents of the requirement to wear masks? If they won't have any power to enforce it, other than requiring someone to leave the project if they're not complying, then they can only maintain the message. A number of providers have already flagged that they know some clients will not be compliant.

A The requirement to wear a face-covering is a legal requirement and the guidance states:

- a. *Residents must wear face coverings by law when in communal indoor spaces in hostels, unless they are exempt for health, disability or other reasons. It is not mandatory for residents to wear face coverings when sleeping in dormitories with others. Hostel providers should consider providing face coverings at reception for all residents, and hostel staff should remind residents that they are required to wear them when in communal indoor spaces within the hostel.*
- b. *The law states that face-coverings must be worn in public areas in hostels:*
<https://www.legislation.gov.uk/uksi/2020/839/made>

Hence, there is an ability to enforce this regulation. How legal requirements are dealt with is part of ongoing work in relation to range of enforcement issues. However how hostel managers choose to enforce this at the moment is left to their discretion. The issue is the risk that enforcement can lead disengagement and return to the streets. I think it will be major challenge support certain groups to conform to the expectations but promoting consistent message across all forms of accommodation is key.

[Link to Guidance](https://www.gov.uk/government/publications/covid-19-guidance-on-services-for-people-experiencing-rough-sleeping/covid-19-guidance-for-commissioners-and-providers-of-hostel-services-for-people-experiencing-homelessness-and-rough-sleeping)

<https://www.gov.uk/government/publications/covid-19-guidance-on-services-for-people-experiencing-rough-sleeping/covid-19-guidance-for-commissioners-and-providers-of-hostel-services-for-people-experiencing-homelessness-and-rough-sleeping>