Preventing youth homelessness: What works?
Thank you

Centrepoint would like to thank the following organisations, individuals and local authorities for the evidence and expertise they have shared to inform this review:

1625 Independent People
Alison Rouncivell (Mediator)
Banbury Young Homelessness Project
Barnardo’s
Broxtowe Youth Homelessness
Calderdale Council
Cardinal Hulme Centre
Cheshire East Council
Cyrenians
Dr Beth Watts, Heriot-Watt University
Leicestershire Youth Offending Service
London Borough of Croydon
Margaret Pendlebury (Mediator)
Newcastle City Council
No Wrong Door (North Yorkshire)
North Yorkshire County Council
One Plus One
P3 Charity
Parkfield Hall (Endeavour Housing Association)
Solihull Metropolitan Borough Council
St Basils
St Mungo’s
Stockton Council
Stonewall Housing
South Tyneside Homes
TBAP Multi-Academy Trust
The Children’s Society
Tower Hamlets Council
Westminster City Council
Wokingham Borough Council

Recommendations

Central government should:

- Implement a cross-departmental strategy on homelessness to co-ordinate the necessary action on prevention from multiple departments. This must be reflected at the local authority level
- Conduct a national review of mediation services and the efficacy of different approaches, with a view to ensuring that effective mediation is available in every local authority
- Ensure that holistic early family support, regardless of the child or young person’s age, is championed in the government’s Life Chances Strategy
- Introduce a homelessness prevention duty and a stronger advice and information duty
- Sponsor a national, virtual portal giving all young people access to advice and information about homelessness. This portal must facilitate access to homelessness services in the young person’s local area in partnership with local authorities

Local authorities should:

- Signpost all young people, irrespective of priority need, intentionality or local connection status, who present at housing services for advice and information or make a homelessness application to an independent advocacy service
- Have youth specific emergency/temporary accommodation that is suitable for young people requiring respite from the family home while an assessment is undertaken and appropriate support is put in place for the whole family
- Assess levels of staff turnover in teams working directly with vulnerable families. A strategy must be implemented to address the causes of staff turnover and tangible solutions put in place
Introduction
The provision of effective interventions for young people at risk of homelessness is essential if youth homelessness is to be reduced and prevented. However, research on which approaches are evidenced to effectively prevent youth homelessness is scarce. There is a wide range of services which aim to prevent youth homelessness in England, but the quality and availability differs between local authorities. To ensure high quality, cost-effective services are accessible, it is imperative that more evidence on what works effectively is available.

Methodology
A review of existing literature was conducted to find evaluations of interventions aiming to prevent youth homelessness. This review was undertaken using online academic search engines and was based on pre-defined search terms, to generate a list of potential evidence. Thirty six studies were identified and were then evaluated against pre-defined inclusion criteria to produce a final shortlist of relevant studies. The inclusion criteria were:

- Includes primary data, either qualitative or quantitative
- Relates to young people of secondary school age or above (11+)
- Evidence from the UK
- Published since 2000
- Intervention must aim to prevent youth homelessness

Six of the original thirty six studies fulfilled the inclusion criteria (see appendix 1 for a summary of the evaluations). These studies were evaluated to draw out the key factors presented in this report. They fall into the categories of what works, what could work and what is unexplored and form the basis of this report.

Alongside the literature review, a public call for evidence was conducted, seeking further evidence on prevention programmes. Evidence was received from 29 organisations, including charities, local authorities and providers. Their evidence gives essential insight into front line practice and adds weight to the findings from the evidence review.

This review brings together and examines evidence on a range of interventions which aim to prevent youth homelessness. The analysis spans primary prevention where families are supported before homelessness occurs; through to tertiary prevention for young people already experiencing homelessness. By examining the available research, the review explores what is evidenced to work effectively, what could work and what is unexplored. An economic analysis is also presented which demonstrates the cost of youth homelessness to the public purse if it is not prevented early.

Prevention: the current context

Legislative framework
Homelessness legislation in England is centred on priority need as a means of establishing who is owed the main rehousing duty by the local authority. Since 2011/12, the number of 16-24 year old homeless applicants accepted as in priority need in England, and therefore receiving statutory support, has decreased from 17,380 to 13,270. The Housing (Homeless Persons) Act 1977 also places a duty on local authorities to provide advice and appropriate assistance, even if the person is not in priority need.

Homelessness prevention in England is currently outside the statutory legal framework. Local authorities record cases where positive action prevented or relieved homelessness, though this is outside the homelessness statutory framework. While this data cannot be broken down by age, research suggests that prevention and relief among young people is almost three times higher than in the official all-age data. 9.5 per 1000 16-24 year olds were offered prevention and relief support, compared with 3.7 per 1000 for all ages within the same local authorities. While there is guidance and examples of best practice relating to prevention and relief, local authorities are not accountable for this provision as there is not currently a duty to provide it. There is also evidence that it is sometimes used as ‘gatekeeping’ to prevent people from making a homelessness application.

Prevention should be brought onto an equal statutory footing. In Wales, local authorities now have a duty to prevent within 56 days, irrespective of priority need, intentionality or local connection status. The Homelessness Reduction bill proposes a similar legislative framework to be introduced in England to strengthen the statutory safety net. This would ensure essential support is provided not just to those currently owed a statutory duty.
The causes of youth homelessness

The causes of homelessness go beyond housing. Family relationship breakdown is the main driver of youth homelessness, though many factors escalate to the point at which a young person cannot remain with their family. These reasons include young people thrown out for revealing their sexuality; involvement in offending; poverty; the introduction of a parent’s new partner; not being in education, employment or training; poor mental health; and domestic violence. This poses a real challenge to policy makers and those developing services to ensure there is a holistic response that can meet a range of needs and tackles multiple problems.

Young people who are forced to leave home face additional barriers which prevent them from successfully living independently due to their age. The expectation that those under 25 are able to rely on parental support has ensured they are not eligible for support available to older people. Those aged 18 to 21 face the proposed cut to housing support, due to be brought into force in April 2017, if they are out of work and can only claim the Shared Accommodation Rate if they are under 35, making the private rented sector unaffordable. The introduction of the Local Housing Allowance cap to social housing extends this inaccessibility to council owned properties.

Furthermore, young people are discriminated against in the job market, as those under 25 have been exempt from the new national living wage and those undertaking their first year as an apprentice are only eligible for an hourly rate of £3.30. Young people therefore face lower wages while the cost of bills, rent and council tax remains the same irrespective of age.

The conceptualisation of prevention

‘Preventing youth homelessness’ is a problematic concept. The logic of prevention requires a definition of what is to be prevented (i.e. homelessness), a specified intervention, and then the establishment of a causal connection between the intervention and the avoidance of homelessness. However social issues are complex and evolve over time, making it difficult to establish causality.

An intervention may be put in place at different stages of homelessness. This can be conceptualised as primary, secondary and tertiary prevention:

- Primary prevention averts new cases of homelessness by intervening well before homelessness may occur
- Secondary prevention treats new cases as early as possible, often when a young person presents to their local authority
- Tertiary prevention supports existing cases, often to reduce rough sleeping and repeat homelessness

Secondary prevention was the most prevalent form of prevention within the evidence review. Evidence on primary prevention was scarcer, potentially because the effectiveness is more difficult to assess.
Is prevention better than cure? The cost of youth homelessness

Many prevention services focus on helping young people when they are in crisis and on the verge of homelessness. Centrepoint has recently completed separate research to explore the potential public savings that could be gained from preventing homelessness before young people reach such a crisis point. If the prevention at an earlier stage could produce significant financial savings for local authorities and central government, then there is a clear incentive to increase the funding for early intervention programmes for young people at risk of homelessness.

The study estimated the net public cost of a young person experiencing homelessness by comparing the public costs of NEET young people to young people who are both NEET and homeless.

There are significant differences between the costs incurred by young people under 18 and over 18, in terms of education and employment. Therefore two cost estimates were produced; one for the net cost of homelessness for 16-17 year olds and one for the net cost of homelessness for 18-24 year olds.

Cost of homelessness for NEET young people

<table>
<thead>
<tr>
<th></th>
<th>Cost of NEET young person</th>
<th>Cost of NEET homeless young person</th>
<th>Added cost of homelessness</th>
</tr>
</thead>
<tbody>
<tr>
<td>16/17 year olds</td>
<td>£3,300</td>
<td>£12,200</td>
<td>£8,900</td>
</tr>
</tbody>
</table>
| 18-24 year olds  | £7,200                    | £19,400                           | £12,200                   

The research found that the cost of homelessness to the state is an estimated £8,900 per year for 16-17 year olds, which rises to £12,200 per year for 18-24 year olds.

It is estimated that 83,000 young people experience homelessness every year. Based on Centrepoint data which shows that 58 per cent of homeless young people are NEET, the annual net public finance cost for all homeless NEET young people is estimated at £556.5m per year over and above the cost of NEET young people in general.

The graph above shows that welfare costs dominate the differential between the two groups, primarily due to the high housing costs for homeless young people. This provides strong evidence that we urgently need to move our focus towards ‘primary prevention’ to support young people and their families, before they reach a crisis point. Our prevention services need to be far more focussed on solving the environmental and social risk factors of youth homelessness that necessitate more costly crisis intervention if left unresolved.

This research gives a strong indication that preventing children from becoming homeless is likely to be far cheaper than supporting them once they leave the family home. Youth prevention services that help the young person while they remain with their family are likely to be cost-beneficial, if they can be delivered for less than £9,000 per child per year.

These estimates also show the rise in additional costs that occur once homeless young people reach 18, primarily due to increased welfare expenditure and loss of tax. Failing to prevent homelessness until young people are over 18 costs the state an estimated 37 per cent extra every year compared to preventing it when they are 16 or 17.

This study shows that not only is prevention better than cure, but that early prevention is far better than late prevention.

The full report and methodology can be found online here: www.centrepoint.org.uk/prevention
What works?

Common factors emerged within the evidence review as increasing the likelihood that an intervention would successfully prevent youth homelessness. These principles can be applied to a range of service provision, whether it is primary, secondary or tertiary prevention.

Multi-agency working

Multi-agency models are generally based upon three common principles; information sharing, joint decision making and coordinated intervention. All of the evaluations evidenced the importance of multi-agency working. The combination and number of agencies involved varied but the housing authority was almost always the central agency. This reflects statutory responsibility but also the housing authority’s potential to act as a co-ordinator and a gateway into other services.

Multi-agency working reduces duplication and so increases the effectiveness of service provision. It brings agencies with different remits together, which is essential for families requiring a range of services. Clear actions must be agreed between agencies to prevent families falling between the gaps. Evidence submitted by Wokingham Council highlighted the importance of maintaining good communication and sharing information across collaborations. Mechanisms for achieving this included; joint working conventions, service level agreements, technological platforms and joint protocols. Joint protocols clearly define the roles of each agency and should lead to more effective joint working, most commonly between housing authorities, children’s services and other key delivery partners.

Strong multi-agency working also harnesses effective referral practices. Agencies referring clients to the Safe and Sound project reported good working relationships with the project and valued their prompt response to referrals as well as flexibility with the range of issues faced by clients.

Recommendation: Central Government should implement a cross-departmental strategy on homelessness to co-ordinate the necessary action on prevention from multiple departments. This must be reflected at the local authority level.

Single front door

A ‘single front door’ approach is utilised by many local authorities as a gateway into services. This may be a physical hub building where agencies are co-located and facilitate access to other services within the pathway.

Due to the often chaotic nature in which this group of young people engage with services, often involving shifting between home and homelessness, the single front door streamlines and simplifies their engagement. Much like multi-agency working, it also enables practitioners to co-ordinate a holistic package of support across a range of services and reduces the risk of a young person falling between services.
Positive professional relationships between staff and service users were cited as the key ingredient to success. In one service, key workers were regarded as a friend, counsellor and expert rolled into one. This relationship enables the most disengaged and vulnerable families to build resilience and self-esteem, harnessing positive engagement. Good practice was evidenced where practitioners successfully supported parents to improve parenting skills, e.g. helping them to create home environments where school attendance and attainment were valued and homework completed.

Some relationships do not flourish. High staff turnover means that families become frustrated and marginalised by repeating their story again and again. Research shows that staff turnover is not simply a symptom of low pay but also of issues such as a lack of career development opportunities. Service fatigue also affects professional relationships, where families had engaged with multiple services, but still faced problems.

Young people’s perceptions and feelings about the support they are receiving must be taken into account. Some young people disengaged with services because they felt that staff had taken their parents’ side. Young people value being treated like an adult; this enables them to communicate better and to talk rather than run away from problems.

Recommendation:
Central Government should ensure that holistic early family support, regardless of the child or young person’s age, is championed in the government’s Life Chances Strategy.

A whole-family approach

Across much of the evidence, a whole family approach was cited as crucial, given that youth homelessness often stems from issues going on at home. This approach enables families to gain support as a unit, as well as working with parents and children one-to-one. Knowsley Family Support Service took an entirely family-orientated approach and included:

- Advice for parents on finance, housing or employment
- Opportunities for the family to engage in activities together
- Referring children and young people to specialist mental wellbeing services
- Address children and young people’s education needs through securing new school placements and supporting with homework
- Improving parents’ engagement with their child’s school

This led to improved mental health, better family communication, stable housing, increased family resilience and family stability.

Family support has the potential to act as a catalyst for change in other areas of family life, and young people felt more able to cope with difficulties at home, even where things had not changed. The actions and attitudes of parents also changed, for example being less strict and more willing to compromise with the young person.

Young person

“Me and my mum have been a lot closer since we started coming down here, I can talk to her now. Once a week we go out shopping together, or go to the pictures or whatever. Just spend a bit more time together, whereas I never used to see much of her.”

Young person

“Things were just getting so bad; I might have turned to drugs or something… but she [keyworker] showed me that there’s hope. She tried to help me and she gave me hope and something to live for, something to work towards.”

Young person

Recommendation:
Local authorities should assess levels of staff turnover in teams working directly with vulnerable families. A strategy must be implemented to address the causes of staff turnover and tangible solutions put in place.
What could work

While some approaches showed promising signs, the evidence base was patchy. Further research is needed to establish the best ways of implementing these approaches and their effectiveness in different contexts.

The different forms of mediation

Various mediation models are used to support young people experiencing or at risk of homelessness. Mediation may be implemented directly by local authority housing officers, or by commissioned independent mediators. This is sometimes while the young person is still at home and/or sometimes once they have presented as homeless. Overall, the proportion of local authorities offering mediation has declined from 92 per cent in 2014 to 77 per cent in 2015. High quality mediation is costly and a stronger evidence base is needed to demonstrate its effectiveness. Based on current evidence, there are some overarching lessons:

1. Mediation should be impartial and not solely focussed on return home

The evidence highlights concerns that mediation is sometimes undertaken by housing officers who are not qualified family mediators, are not impartial, and may use it to drive return home as this can be recorded in prevention and relief data.

The focus on return home can also be problematic when mediation is externally commissioned. While the local authority may prioritise ‘hard outcomes’ i.e. return home, the independent mediator may prioritise ‘soft outcomes’ i.e. improved relationships. It is difficult to overcome this difference but not impossible; a clear discussion around priorities is needed at the beginning of the commissioning process. The outcomes recorded by mediators should not focus solely on return home, but recognise the complexity of the issues faced by families and other milestones achieved.

2. Mediators should work closely with other delivery agencies to provide a holistic package of support

Mediation can resolve relationship difficulties, whether the young person is able to return home or not. However, the evidence shows that families experiencing relationship breakdown may have complex needs which mediation alone cannot address. Mediation should be offered alongside other interventions, where necessary.

There is evidence that take up of mediation is greater in areas where mediators work closely with other agencies. This enables staff to tailor service provision, based on information sharing between agencies. For example, in one service a bespoke counselling service was developed in one area in response to young people’s needs.

3. Mediation should be offered as early as possible

Mediation is most effective when implemented early. Once a young person presents as homeless, relationships are likely to be at breaking point which makes it difficult to secure the engagement of those involved. In one study, only 14 per cent of homeless young people thought mediation would be useful once they had become homeless. ‘Pre-mediation’ work may be needed to prepare families to engage with mediation. It is therefore crucial that mediation is accessible as early as possible.

“...get your way around arguing by talking and hearing each other, and that works really well rather than just being told to stop arguing... It’s solving the problem before it starts really.”

Young person

From a mediator: what is needed for successful mediation

Alison, an Intergenerational Mediator with over 12 years’ experience summarises the components of successful mediation:

- Work with young people and families before crisis; that is when people have the time and head space to reflect and make positive changes
- Young people and families need a willingness to change things for the better
- Young people and families need the capacity and readiness to engage. This may be limited for example by substance misuse or mental health issues or it may just be the ‘wrong time’ for mediation
- Work with young people and their families for as long as is needed and in sessions unrestricted by time constraints
- Be able to work with other important adults in the young person’s life if appropriate
- The mediator should have as many skills and techniques as possible to make their work with the young person as effective as possible
Overall mediation can reconcile family relationships, but it should not be used simply to secure a quick return home when wider problems warrant a more comprehensive service response.

**Recommendation:** Central Government should conduct a national review of mediation services and the efficacy of different approaches, with a view to ensuring that effective mediation is available in every local authority.

**Access to advice and information**

Timely access to information and advice is crucial. Local authorities are required to provide information and advice to those who are homeless or at risk of homelessness. The wider evidence highlighted longstanding concerns about the inadequacy and poor quality of advice given to non-statutory homeless households. One study found that 15 per cent of homeless people surveyed who had sought advice from a local authority received only general advice and 27 per cent received no advice at all.

“When I was homeless...I went to the council, and I was under 18 so they told me to go to social services so I went there, and then at first they refused to help me but I kept on going there. I was like I’m only 16 and I have nowhere to go, and then they put me into St Mungo’s.

St Mungo’s young person, evidence submission

No evidence was found on the effectiveness of different types of homelessness information and advice. Studies refer to ‘information and advice’ as a singular thing and little consideration is given to different formats, sources or audiences. Similarly, the Housing Act 1996 does not go into any significant detail about the steps a local authority should take to fulfil their duty to provide advice and information about homelessness.

Advocacy services are essential for young people at risk of homelessness who may not have the support of a trusted adult family member. However, the evidence suggests that only one in five young people who seek help because of homelessness have access to dedicated and independent advocacy services. Independent advocacy should be available to all young people to advise them of their rights and entitlements, and to co-ordinate access to services.

**Recommendation:** Central Government should introduce a homelessness prevention duty and a stronger advice and information duty.

**Recommendation:** Local authorities should signpost all young people, irrespective of priority need, intentionality or local connection status, who present at housing services for advice and information or make a homelessness application to an independent advocacy service.

**Emergency accommodation**

Emergency accommodation is often used as a response to homelessness but may be defined as a form of tertiary prevention; supporting homeless young people to reduce further harm. Overall, there is a lack of robust evidence on the efficacy of different forms of emergency accommodation. One study of Nightstop provides some crucial insight. Nightstop is a model of emergency accommodation where young people stay with a volunteer host while family reconciliation work is undertaken and/or more settled accommodation secured. The service prevents rough sleeping, improves stability and wellbeing, and, in some cases, hosts help young people to access education and employment. Emergency accommodation may also keep young people out of poor quality accommodation and wider social influences and networks they would be exposed to within other forms of accommodation. Despite these positive indicators, 49 per cent of areas do not have Nightstop or a similar scheme.

For those young people whose homelessness has not been prevented through primary prevention, emergency accommodation is a vital safety net. It is essential that good emergency accommodation options are available in all areas so young people do not have to sleep in unsafe places.

**Recommendation:** Local authorities should have youth specific emergency/temporary accommodation that is suitable for young people requiring respite from the family home while an assessment is undertaken and appropriate support is put in place for the whole family.
What’s unexplored?

The evidence base on in-school interventions is particularly weak, despite being an approach used by numerous charities and local authorities.

Primary prevention in schools

Interventions within schools remain a popular primary prevention approach, equipping children with the knowledge needed if they find themselves facing homelessness. This approach has the potential to provide all children in a classroom access to the same intervention. Several of the organisations that submitted evidence to the review operate prevention programmes within schools. Often this involves recruiting formally homeless young people as mentors or educators to talk about their experience of homelessness.

There is a lack of robust evidence on the impact of this form of prevention work. Efficacy is largely measured using participant feedback mechanisms, often at the end of the session, giving only a snapshot of understanding immediately following the intervention. Robustly evidencing the long term impact is a challenge and would likely involve comparing the outcomes of peer groups who have experienced these interventions with a control group. Given what is known about the causes of youth homelessness and the complex needs of families who experience it, it is unlikely that a school-based workshop alone would prevent homelessness, though it may provide young people with the knowledge needed to access more targeted support.

What’s needed?

Conclusions

This report is based on a systematic review of some of the most robust available evidence on the approaches to youth homelessness prevention. Policy and practice tend to be focussed on secondary and tertiary prevention, while the evidence on primary prevention is patchy; particularly prevention in schools.

A lack of evidence on the relative efficacy of different approaches makes it difficult to establish which intervention will be most effective in preventing youth homelessness, particularly in a context of restricting budgets.

Mediation, information and advice, and some models of emergency accommodation showed promising signs. However, given that these services are commonly offered and funded by local authorities, robust evidence on their effectiveness is urgently needed.

Multi-agency working, a ‘single front door’ into services, whole-family approaches and positive professional relationships were more strongly evidenced as successfully preventing youth homelessness across the evaluations. Furthermore, they have the potential to span primary, secondary and tertiary approaches.

However, given the complexity of problems faced by families where youth homelessness occurs, the government and local authorities must fundamentally reimagine the services they provide. A package of tailored support which goes beyond housing is urgently needed; going beyond traditional department boundaries and funding arrangements towards a cross-organisational approach.

Local authorities are best placed to deliver and co-ordinate youth homelessness in their own area. While they are faced with decreasing budgets and cuts to services, there is little funding to invest in and develop services that prevent youth homelessness at the earliest point. The focus too often remains on intervention at the point of crisis.

A shift in resources from crisis intervention to early help is needed, investing in approaches such as holistic family support. While such a move would require upfront investment in the early stages, preventing homelessness occurring in the first place is the only sustainable solution for improving a young person’s life chances and securing financial savings for taxpayers in the long term.
Appendix 1: The shortlisted evaluations which have formed the basis of this review

<table>
<thead>
<tr>
<th>Evaluation no.</th>
<th>The service</th>
<th>Date</th>
<th>Outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td>One</td>
<td>An evaluation of six Nightstop services across the UK where homeless young people stay with a volunteer while family reconciliation work is undertaken and/or more settled accommodation is secured.</td>
<td>2011</td>
<td>Tertiary prevention: supporting young people who are already experiencing homelessness; reduce rough sleeping, provide a safe place to stay, rebuild family relationships, and avoid long term/ repeat homelessness.</td>
</tr>
<tr>
<td>Two</td>
<td>An evaluation of the way in which Newcastle City Council and the council’s arm’s-length management organisation, Your Homes Newcastle, work together to prevent homelessness.</td>
<td>2011</td>
<td>Primary prevention: the Family Intervention Project harnessed improved family behaviour and reduced police involvement to maintain family stability. Secondary and tertiary prevention: homelessness prevented due to pre-tenancy support, reduced rent arrears.</td>
</tr>
<tr>
<td>Three</td>
<td>The Safe in the City programme comprising eight schemes across London, delivered by local agencies partnered with local authorities. Schemes included life-skills, family mediation and peer mentoring.</td>
<td>2004</td>
<td>Primary prevention: tackling homelessness risk factors e.g. reducing social exclusion, improving family relationships.</td>
</tr>
<tr>
<td>Four</td>
<td>A whole family support service in Knowsley for families with a history of homelessness, aiming to prevent young people within the home becoming NEET (not in education, employment or training) and experiencing homelessness themselves.</td>
<td>2015</td>
<td>Primary prevention: increase family stability, recognise and tackle anti-social behaviour, help children understand their circumstance and choices, promote positive engagement with the education system.</td>
</tr>
<tr>
<td>Five</td>
<td>The Safe Moves programme aimed to produce greater housing stability through a package of support including life-skills training, family mediation and support, peer mentoring and support to move into supported or independent accommodation where needed. It operated across Ryedale, Sufolk Coastal, Birmingham and Wolverhampton.</td>
<td>2005</td>
<td>Primary prevention: helping young people to remain at home, improved family stability. Secondary prevention: reduced number of young people in insecure accommodation.</td>
</tr>
<tr>
<td>Six</td>
<td>The Safe and Sound project aims to tackle the challenges faced by young people resulting from housing instability and family breakdown. The project operated in Fife, Scotland.</td>
<td>2014</td>
<td>Primary prevention: Removing the risk of homelessness by working with young people and families to resolve disputes.</td>
</tr>
</tbody>
</table>

Endnotes

6. ibid
9. ibid
14. St Basil’s (2015) Submission to Centrepoint’s Call for Evidence
16. ibid
18. ibid
19. ibid
20. ibid
23. ibid
26. ibid
31. ibid
35. ibid
36. ibid
37. ibid