Research report

Caught by the Act:

the scale of youth homelessness in the UK







Glossary

Young person - the young people referenced in this report are aged 16 to 24 years old. This includes young people who are single, in a couple, and those with dependent children.

Personal housing plan -

if a young person is assessed as homeless or at risk of homelessness a personal housing plan is generated based on their needs, outlining the steps to be taken to prevent or relieve homelessness.

Intentionally homeless

- young people may be deemed intentionally homeless if the council asserts they could have prevented their homelessness.

Duty ends -Not priority not housed

Main housing duty - any young person in receipt of a main duty is owed suitable temporary or permanent accommodation. This is an ongoing duty for as long as the young person is eligible.

Broadly, this includes all 16 and 17 year olds, pregnant women and households with dependent children. It also problem. Priority need has been abolished in Scotland.

Statutorily homeless – a young person in England is considered to be statutorily homeless and owed a housing duty if they are eligible, unintentionally homeless and in priority need.

Presentations – a young person who has presented to their local authority as they were homeless or at risk of homelessness. They may also be referred to as young people approaching or seeking help from their council.

Initial assessment – an initial assessment under the Homelessness Reduction Act 2017 to determine if the young person is owed a prevention or relief duty.

Homeless

Prevention duty - owed to any young person assessed as being at risk of homelessness within at least 56 days. The council must take steps to help them maintain their current accommodation or secure alternative accommodation.

Relief duty – owed to any young person assessed as homeless. The duty lasts at least 56 days, within which the council must help them to secure alternative accommodation for at least 6 months.

Ineligible – a minority of young people are ineligible for housing assistance having no recourse to public funds.

Positive outcome

 homelessness prevented

Duty ends -

Positive outcome

 homelessness relieved

Main duty assessment - a young person has been given a main duty assessment if, after the end of a relief duty they were assessed under the Housing Act 1996 to determine if they are owed a main duty.

Priority need – priority need varies across the nations. includes other groups if the local authority is satisfied they are vulnerable, such as care leavers or those with a health

Positive outcome - housed



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Introduction

There is no official definition or measurement of the scale of youth homelessness in the UK. To end youth homelessness, we need to know how many young people are affected by it. Without accurate and comparable national, regional, and local data on the scale and experience of youth homelessness we cannot know how best to tackle it nor ensure sufficient funding is allocated so that young people receive the support they need.

The Centrepoint Youth Homelessness Databank significantly increases the information that is publicly accessible on youth homelessness by collecting council level data to build a more informed national understanding of the problem. This report presents an analysis of data collected by local authorities in 2018/19, which was the first year of the Homelessness Reduction Act (HRA). Local authorities provided data on the number of 16 to 24 year olds approaching them because they were homeless or at risk of homelessness, and then their subsequent journey through local authority support. This report also updates the previous year's findings, including Centrepoint's estimate of the national scale of youth homelessness. The report is mainly focused on the first year of available data since the introduction of the HRA in England; however, data from the devolved nations is included whenever possible.

Centrepoint's estimate is made through the lens of those who have sought help from their local authority. It is not currently possible to accurately gauge the scale of rough sleeping and hidden homelessness amongst young people who have not approached their council for support although previous estimates, commissioned by Centrepoint, suggest that a considerable number of young people that experience homelessness never approach their local authorityⁱ.

It is important to stress that the factors that affect youth homelessness go beyond direct housing and homelessness support. They include limited and inappropriate housing stock, scarce and insecure employment opportunities, and welfare entitlements which do not meet living costs. Without extending the proactive, preventative approach enshrined in the HRA to other services that work to support those that are at risk of homelessness, it will be impossible to end youth homelessness.

Visit www.yhdatabank.org to explore the data discussed in this report. The databank includes data from individual local authorities, as well as regional and national data, providing the only single point of access to the most complete source of information on youth homelessness in the UK.



Methodology

Due to differing legislation in the devolved nations, the data collected and published varies significantly between each nation. Data for Scotland, Northern Ireland, and Wales was obtained from their respective central government departments. English data was obtained through Freedom of Information requests, which 98 per cent of English local authorities responded to. Of those local authorities that responded, 95 per cent were able to provide statistics on their local experiences of youth homelessness. The high response rate from English local authorities, alongside data from the other three nations allows us to provide a comprehensive picture of youth homelessness in the UK in terms of the number of young people presenting to their local authority because they were homeless or at risk of homelessness.

The FOI request sent to English local authority requested the number of young people who¹:

- presented to their council as they are homeless or at risk
- were assessed for a prevention or relief duty under the HRA
- received an initial assessment of being owed a prevention duty
- received an initial assessment of being owed a relief duty
- had a successful prevention duty outcome
- had a prevention duty end leading to a relief duty
- had a prevention duty end for any other reason
- had a relief duty end successfully
- had a relief duty end and lead to main duty assessment
- had a relief duty end for any other reason
- assessed under the Housing Act 1996
- accepted as statutorily homeless and owed a housing duty by their council

This data provides a more extensive picture of youth homelessness than central government data sources which only provide an age group break down for those who are owed either a prevention or relief duty combined. Whilst that is an improvement in available government data on youth homelessness, it does little to demystify the journey that young people take through a homelessness system.

The responses to Centrepoint's freedom of information request show a decrease in the number of responses where the council did not provide the requested data. In 2017/18, 7 per cent of local authorities were unable to provide any of the requested data, this reduced to 5 per cent in 2018/19. This is likely as a result of the HRA which requires local authorities to record more in depth data on all homelessness applications. However, even with these new duties on local authorities a significant amount of the requested data was not available.

Where councils have provided data for the past two years, comparisons are made between 2017/18 and 2018/19. This represents 67 per cent of all local authorities in England. Significantly, these two years respectively cover the year before and after the introduction of the HRA which came into effect in England on April 3rd 2018.

Due to the increase in data required to map the new duties at local authority level, an FOI request was made centrally to the Ministry of Housing, Communities and Local Government for national data on reasons for loss of last settled accommodation for young people.

Alongside the freedom of information requests, twelve qualitative interviews with local housing authority staff, including front line officers, managers, and heads of departments, were also conducted. The local authorities that took part in this process were chosen so as to ensure a reasonably representative subset of council type as well as urban and rural classification.

¹ The response rate for each data point can be found in the technical appendix

Policy framework

The responsibility for tackling homelessness is devolved and each nation has different duties to those who approach them for help.

England

On 3rd April 2018 the HRA came into effect and changed the homelessness support model provided by local authorities in England. The Act legislated for prevention and relief support by adding it as an additional tier of statutory duties regardless of priority need or intentionality. If the prevention and relief work is unsuccessful then young people are assessed to determine if they are owed a full housing duty.

These changes to legislation mean that single homeless young people who would have previously received inconsistent support should now all receive prevention and/or relief support according to their needs. This is particularly significant for those young people who are at risk, but not necessarily at the point of crisis. Previously they may not have received support, as young single people are less likely to be priority need. Now everyone threatened with homelessness must be given up to 56 days of support to help secure accommodation.

The HRA aims to give applicants increased influence over their homelessness application through a more collaborative process. The personal housing plan was brought in as part of the Act to be created in partnership with the applicant. Following the assessment, the personal housing plan puts in place the necessary actions to prevent or relieve homelessness. Applicants also now have the right to request internal reviews of any and all homelessness decisions at any stage of their process, as well as the right to present at any local authority for support.

The HRA also brought in additional support for local authorities, including three years of additional burdens funding with the expectation that funding would not be required beyond this period. This was motivated by the idea that the HRA would bring a reduction in the number of main duties required, which would in turn cover the cost of the earlier support duties. A new data reporting system known as H-CLIC was also introduced as well as the duty to refer, which places a duty on certain agencies to refer consenting service users who may be homeless or at risk to local authority housing teams.

Wales

The Wales (Housing) Act 2014 was the first legislation in the UK to shift the emphasis towards prevention and relief work before the full housing duty. Under the Wales (Housing) Act, all young people in Wales who present to their council should be assessed and provided with prevention and/or relief support, based on their circumstances. A full housing duty is then only owed to those in priority need in the event that this support is not successful. Wales is most similar to the HRA landscape in England and provided a framework for its development.

The data collected by the Welsh Government focuses on the number of outcomes and allows for a breakdown by age group and local authority. The data, available via the online toolⁱⁱ, includes information at every stage of the application process. These totals include prevention and relief duties (sections 66 and 73 of the Act) and their outcomes (successful, unsuccessful leading to the next stage of support, and duty ended), as well as the different main duty outcomes (eligible and homeless but not in priority need, eligible homeless and in a priority need but intentionally so, and eligible, unintentionally homeless and in priority need (Section 75)).

Northern Ireland

Currently, Northern Ireland operates much like England did prior to the HRA. Young people who are eligible, unintentionally homeless, and in priority need are owed a duty to help them secure accommodation. Unlike in England, however, this responsibility lies with the Northern Ireland Housing Executive (NIHE), as opposed to individual local authorities. In addition, eligibility criteria are more complex in Northern Ireland than elsewhere in the UK as prior behaviour is also considered. For anyone who is not owed a housing duty, the NIHE only has a duty to provide advice, though often additional prevention and relief work is carried out.

The data provided by the NIHE includes main duty presentations and main duty acceptances and is broken down by age range, gender and local authorities.

Scotland

Scottish homelessness policy operates on a significantly different model to the other nations. With the abolition of priority need on 31st December 2012 Scotland's policy has been aimed towards providing a full housing duty meaning that all eligible and unintentionally homeless young people are owed a housing duty from their council.

In Scotland all those who present are assessed. This means that the data provided by the Scottish Governmentⁱⁱⁱ focuses on the totals for each of the four potential decisions following presentation which are broken down by local authority. These are homeless and potentially homeless which are then broken down into intentional and unintentional.

The scale of youth homelessness

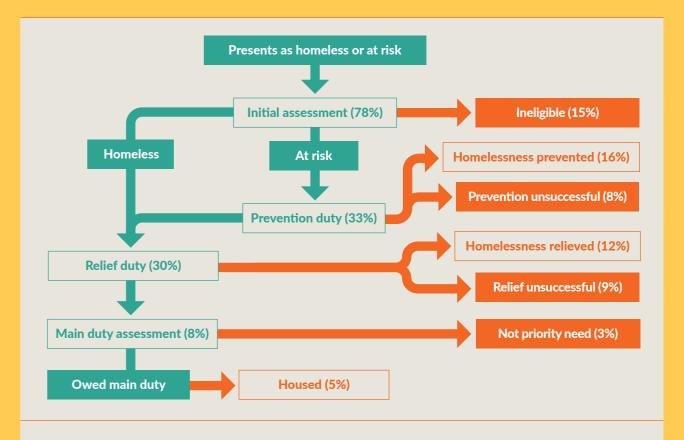
Centrepoint estimates that in 2018/19, 110,000 young people in the UK approached their council for help as they were homelessness or at risk.

91,500 of these young people were in England alone. The following analysis focuses on data collected from English local authorities to understand the new pathway brought in by the HRA in England.

Just under two thirds (64 per cent) received a duty to help prevent or relieve homelessness.

Despite this, only one in three (34 per cent) young people that presented to their council received a positive outcome - their prevention or relief duty ended successfully or they were owed a main duty. There is no publicly available information about what happens to those who fall out of the process

This shows that, whilst the increased support that has been made available has been invaluable, more still needs to be done to ensure that young people's homelessness is resolved successfully.



This diagram shows the percentage of applicants that presented to a council who have reached each stage of the pathway. The percentages for each of the outcomes may not match the totals for each of the duties exactly as some cases were ongoing at the time when the data was collected.

Presenting to the local authority

Centrepoint's estimate reflects high youth homelessness figures across all parts of England. In both rural and urban local authorities, the scale of youth homelessness can represent an alarmingly high percentage of the youth population as a whole. For example, in North Devon and Thanet the number of young people presenting to their council represents 5 per cent of the total population of 16 to 24 year olds, the highest proportion of young people in need in the country. On average the number of young people presenting to their local authority for help represents slightly over 1 per cent of the total youth population^{iv}.

There are a range of ways to present to a council for help online, by phone, in person and in some cases, through home visits:

"We did struggle with assessments being done face to face because we are a rural district. 45% of our population don't live in an urban area, in a town. We've always done face to face assessments with priority need clients, we've done home visits. This is important for people who will have difficulty getting to our office. We also offer telephone assessments, though we do put less value on it as you don't have the same rapport. There are definitely challenges for rural authorities"

-Rural district

Many local authorities facilitate a range of presentation approaches, for example, enabling those applicants with the most complex needs to present in person, for example. This is of particular importance for young people as they often have limited finances, reduced access to transportation, and may not have ties to a specific area. Young people experiencing hidden homelessness, such as sofa surfing, may be particularly transitory so being able to present at any local authority is also crucial. Expanding the number of ways someone can present has also been necessary due to the increased demand for services and important in helping councils manage waiting times. At one local authority we heard of cases where applicants faced waiting times of three to four weeks for an initial assessment.

Whilst additional ways of presenting are a positive step when used for the correct reasons, they must not replace in-person presentations altogether. A review conducted by Centrepoint of council websites found that 43 per cent of local authorities did not provide an address for applicants to present in person. Even those who did provide an address sometimes encouraged or required applicants to fill in online forms and/or make applications online or over the phone. This restrictive approach to presenting can negatively affect the success of the process. If young people are required to fill out an assessment online, complete their own personal housing plan without support or they are given a generic personal housing plan template to print out, then the subsequent support will not be sufficiently tailored to the applicant.

For some it can feel impersonal and challenging to disclose personal information over the phone so crucial details may be omitted. Not all applicants have access to the internet or a phone at the point of crisis. A lack of information, or conflicting information, about the correct steps to take can also lead to frustration, confusion and disengagement.

Local authorities also described how the duty to refer has been difficult to implement operationally, due to differences in client management systems and barriers in sharing data, even when data sharing agreements are in place. One local authority described confusion amongst other agencies about when to make a referral and that often it is left until the service user is homeless, when they could have made the referral earlier under the prevention duty.

The duty to refer also means that a sizable amount of the work to alleviate homelessness is done by the local authority housing team rather than the referring services. This is against the spirit of joint working and the acknowledgement that homelessness is not just a housing issue. There were also a number of cases where services provided minimal information about the individual being referred and a lack of clarity over whether consent had even been acquired.

"I think nobody's perfect and it's been sprung on a lot of people and unfortunately we weren't a local authority where organisations were really forthcoming with letting us know about homelessness. We always found out on the day that people were homeless, so I think in a way I can't think of an organisation that's nailed it"

- Urban unitary

"I'd like to know what enforcement there is on the duty to refer because it's all well and good saying it's there, it's legislated and we can loosely talk around the fact they should do it but if we know that some actively aren't what's happening with it"

- Rural unitary

For councils where data was available from both 2017/18 and 2018/19 there was a 6 per cent increase in the number of young people presenting to local authorities in England as homeless or at risk. Due to the introduction of the HRA, the increase could indicate that homeless young people who previously fell through the gaps in support systems are now better able to access help; rather than there being an overall increase in youth homelessness.

"There is a high intake because of the HRA because a lot of people are aware of it, they're aware that service is available now and rightly so, so there is a lot of intake"

- Urban London borough

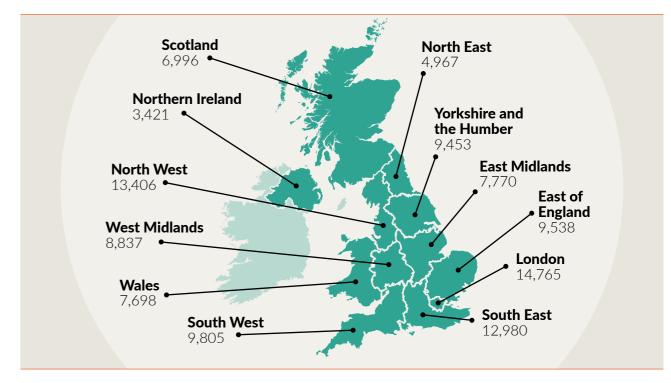
This overall increase in the number of young people presenting as homeless between 2017/18 and 2018/19 is driven by a 17 per cent increase in rural or predominantly rural local authorities. This is concentrated in a few key areas where homelessness presentations have notably increased from 2018/19. For example, 26 rural authorities saw the number of approaches more than double^v. This highlights the growing problem of rural homelessness as a specific concern.

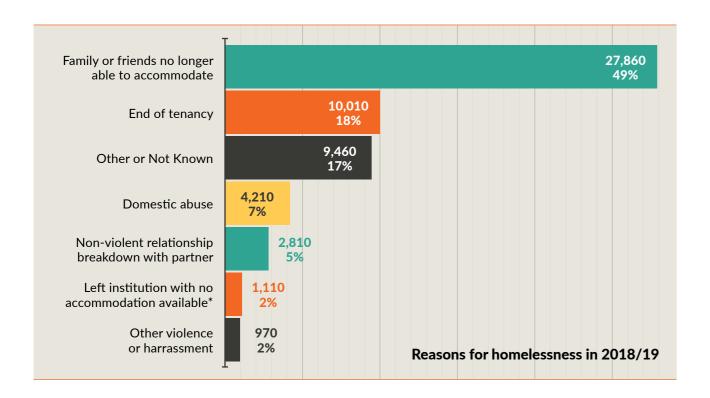
"Busy, it's been very busy. Presentations have increased significantly. From just over 300 to 802. So for a small rural borough which we are presentations have definitely increased. Just because of the additional duties owed"

- Rural district

The East of England saw the largest regional increase in presentations followed by the South West. These two regions have the highest percentage of rural local authorities in England (62 per cent and 65 per cent respectively). With the majority of homelessness services concentrated in urban areas, it may be that some of the more rural local authorities have not been able to access the same resources to mirror the processes that have yielded results in some of the more densely populated areas.

There were found to be a number of reasons for applicants losing their last settled accommodation. Family and friends no longer willing or able to accommodate accounted for almost half (49 per cent) of the reasons for loss of last settled accommodation. End of tenancy was the second most common reason accounting for 18 per cent, this included private and social tenancies as well as leaving supported accommodation. Other reasons, including unknown reasons, was listed as the third most common reason with 17 per cent of applicants falling under this category. This is likely an aspect of the new H-CLIC system coming into effect leading to a disproportionate number of other and unknown responses.





Initial Assessments

Under the HRA everyone who approaches their local authority should receive an initial assessment. However, our data shows that only 79 per cent of those young people that presented actually received an initial assessment to determine whether they were owed a prevention or relief duty.

The introduction of the right to an initial assessment for all applicants has undoubtedly increased the workload of local housing authorities. Councils have adapted to this change in procedure in different ways in order to process applications. For example, some local authorities have a triage team which takes care of the initial administrative burden and ensure applicants are sign posted to the correct service:

"The creation of the triage team helped a lot because all of the teams were doing a lot of the administrative work which was a result of the HRA; registering cases, collecting documents, making sure the information is correct on the system, completing H-CLIC returns and so on. Now the triage team does a lot of the administration so by the time the case gets to an officer, the officer can just start working on the case"

- Urban London borough

Local authorities explained that a backlog of work can lead to lengthy waits for assessments, which in turn leads to increased disengagement of those seeking support. Time pressures also lead to an increased risk of incorrect assessments, particularly for those young people with complex needs.

"Workloads have significantly increased because people are not able to close their case like they used to. Previously you might just need to give advice and assistance and then close the case, rather than have the prevention and hope that would prevent the homelessness. Now we're actually keeping the case open and because people can't close the case, the case load is higher, even though you might not be doing anything. You're not doing something on each case every day, but you are supposed to review PHPs"

- Urban metropolitan borough

The delay in receiving the initial assessment may also reflect gatekeeping, as young people who have contacted the Centrepoint Helpline explain. Young people have been challenged to "prove" they are homeless, advised to return to an unsuitable family home and have at times had difficulty communicating the urgency of their situation.

Prevention & relief duties

The HRA extended the period for which applicants are considered threatened with homelessness from 28 to 56 days. Any young person at risk of homelessness in the next 56 days should receive support under the prevention duty, with some councils starting prevention work as early as 70 days before.

Those that are assessed to be homeless are provided with a relief duty for 56 days. Cases where a prevention duty has been unsuccessful also lead into the relief duty. At this stage councils are not required to source or provide accommodation just facilitate the applicant securing accommodation for at least six months.

Our data reveals that, following their initial assessment:

- 52 per cent of young people received support under the prevention duty
- 48 per cent of young people received support under the relief duty

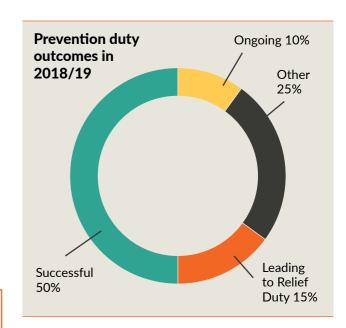
There has been a notable increase in prevention and relief activities since they became a duty under the HRA. Taken together, prevention and relief activities increased from 35 per cent of approaches in 2017/18 to 64 per cent in 2018/19.

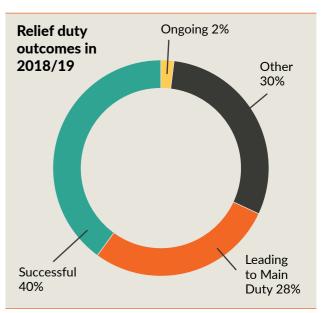
"I mean it's forced us to [shift towards prevention] in a way. Which is great, you know, we want to help, we want to help everybody - that's what we're here for. We have those prevention duties, we can actually support those single applicants and we're trying our very hardest"

- Urban unitary

This expansion in support has not been accompanied by sufficient funding for staffing, leading to a significant increase in workloads. High caseloads mean that officers have less time for each case and, in some instances, applicants have disengaged from the process.

The support offered under a prevention duty is decided at local authority level and so varies significantly. Government guidance suggests that councils should first aim to keep the applicant in their current accommodation, which for young people is often their family home. Local authorities commonly use mediation as a preventative tool, however the effectiveness of this





specific intervention is unclear. The purpose of mediation is to rebuild relationships. This can be at odds with the local authority's aim of keeping young people within the family home where rebuilding these relationships may be best served by the parties not cohabiting.

"I've not seen any guidance on what a good prevention offer looks like, how to fully discharge your prevention duty. How to be doing the best that we can. What does that really look like? We fund lots of different schemes, debt advice, rent deposit schemes etc. But I've not seen anything new or different since the HRA. What's a really good example of a local authority who's got that nailed?"

- Rural district

The main housing duty

A main duty assessment is owed where relief ends unsuccessfully and a young person remains homeless after 56 days. The main housing duty is owed to those assessed as statutory homeless as they are found to be unintentionally homeless, eligible, and in priority need. In 2018/19, more than six in ten (62 per cent) main duty assessments ended with a main duty acceptance, compared to 35 per cent in 2017/18. The overall number of both main duty assessments and subsequent duties owed has also reduced significantly with the introduction of prevention and relief duties. This suggests that the HRA has been successful in supporting applicants upstream through prevention and relief.

The HRA has brought in a support framework aimed at engaging young people at a much earlier stage. However, local authorities revealed an unexpected negative effect on those young people who are eligible, unintentionally homeless and in priority need. The HRA has delayed, and in some cases reduced, the support those young people receive.

Prior to the HRA, young people in priority need would have received a main duty assessment straight away. They would have approached their local authority, received a main duty assessment and then been housed under the main duty. Now they must first undergo the relief duty process, where they are required to lead their own housing search for 56 days. Only after this has elapsed will they receive the main duty assessment, if they are still homeless. This creates added difficulty and delay for young people in crisis, such as those fleeing domestic abuse, experiencing mental health problems or nearing full-term pregnancy.

"We would have accepted [prior to the HRA] a full duty sooner before. It's delayed those who are owed a full duty, it's either delayed it or ended it with an offer of a private rented property sooner and of course now we only have to do 6 months tenancy relief"

- Urban metropolitan borough

"Personally I would prefer that, giving those with complex needs a main duty without the prevention and relief stages"

- Rural unitary

One of the aims of the HRA was to reduce the number of main duty decisions by providing support upstream. This would also yield financial savings that could be diverted to cover the cost of that preventative support. In the first year of the HRA, main duty acceptances dropped from 13 per cent of approaches in 2017/18 to only 5 per cent in 2018/19.

This decrease in main duties owed is less than the 10 per cent reduction used by MHCLG when calculating the HRA burdens funding. This reflects concerns about the amount of additional burdens funding allocated to local authorities for the implementation of the HRA, especially in the context of wider cuts to local authority budgets. In London alone, there had been an estimated £3m increase in costs between 2017/18 to 2018/19 that were not covered by the additional burdens funding, so the national shortfall is likely to be even higher vi.

"The main issue for us is around the funding. The burdens funding was temporary for the first three years, we're all curious to know what happens next. The idea was that government would give councils funding for three years and homelessness would have dropped so much that we wouldn't need the additional funding anymore. That was too idealistic"

- Urban metropolitan borough

The recently announced Homelessness Reduction Grant of £63m for 2020/21 is a welcome increase in support for the Act. However, a longer term funding settlement is needed which enables local authorities to plan effective homelessness services over the course of the next parliament. This is vital if the government is to realise it's commitment to reduce homelessness and eliminate rough sleeping.



The drivers of youth homelessness

Not all local authorities were able to provide all the data requested on the scale of youth homelessness in their area. This was often due to IT and data issues arising from the HRA. In these cases, we have estimated the number of young people that presented to their local authority by making use of known predictors and drivers of youth homelessness.

Much of the existing evidence on the predictors of homelessness examine both individual level factors and structural factors. Individual level factors may include mental and physical health, family breakdown, or substance misuse, whilst structural factors look at macro causes such as the housing market, job market and welfare. The causes of homelessness are widely agreed to be a complex combination of both.

To develop our national estimate of youth homeless, we tested a range of characteristics to determine which had a statistically significant relationship with the scale of youth homelessness. The variables selected were chosen following a review of background literature^{vii} on homelessness as well as conversations with policy experts and data experts working with DataKind UK.

Five variables had a statistically significant relationship with the scale of youth homelessness, providing insight into the link between homelessness and wider factors. The five factors reflect wider evidence on the drivers of youth homelessness:



1. House prices: the ratio of median house price to median gross annual residence-based earnings was a proxy measure for the impact of the lack of affordable housing^{viii}. A 1 per cent increase in housing affordability corresponded with a 0.37 per cent increase in the presenting figure for young people.



2. Housing waiting lists: to account for the demand for accommodation, the number of households on the council housing waiting list was used^{ix}. A 1 per cent increase in the number of households on the housing waiting list corresponded with a 0.16 per cent increase in the presenting figure for young people.



3. Social housing stock: the number of social rented units owned by the local authority was used to account for the decline in social housing*. A 1 per cent increase in the number of social units corresponded with a 0.10 per cent increase in the presenting figure for young people.



4. Child poverty: the percentage of children under 16 living in families in receipt of out of work benefits or tax credits where their reported income is less than 60 per cent median income was used to understand the effect of poverty on homelessness^{xi}. An increase of 1 per cent in the number of children in low income families corresponded to a 0.17 per cent increase in the presenting figure for young people.



5. Welfare: the number of people claiming Jobseeker's Allowance plus those who claim Universal Credit and are required to seek work and be available for work was used to account for the unfavourable nature of the labour market^{xii}. An increase of 1 per cent in the number of claimants aged 16-24 corresponded with 0.60 per cent increase in the presenting figure for young people.

This means that for an 'average' area that had the average ratio of median house price to median gross annual residence (8.8), the average number of households on council waiting lists (3472), the average rate of children in low income families (15 per cent), the average number of people aged 16 to 24 claiming UC or JSA (5,410) and the average number of social rented units (16,048) would have an estimated 335 young people presenting to their council.

An expanded break down of the methods used on this modelling can be found in the Technical Appendix.

These structural drivers were also repeatedly raised during interviews with council housing staff, particularly issues around housing affordability and availability.

"Single people have their own challenges and they have their obstacles and barriers, mainly welfare reform in terms of local housing allowance rates and what they are entitled to, it's quite difficult. A lot of the focus of the single team is looking at the private rented sector, looking at HMOs, thinking outside the box"

- Urban London borough

Young people trying to access the private rented sector whilst in receipt of benefits face significant challenges due to the shared accommodation rate falling well short of actual rental costs. As many as 97 per cent of areas in England are unaffordable to single people, couples and small families in 2018/19xiii.

"So we've got a real struggle, a real battle on our hands at the moment where our LHA is much lower than what the actual market rents are. So we were taking a look yesterday and I think it was about April time that we were able to get someone into the private rented sector down here because of the huge shortfall we've got"

- Rural district

Discretionary housing payments are often used where benefit payments do not meet rent costs, which is not sustainable in the long term.

"[Local housing allowance] has put a lot of pressure on our officers having to do the legwork there, having to negotiate with the landlords, and we're using discretionary housing payments more and more to bridge that gap. Which is not necessarily sustainable long term, we do this as a prevention or relief for homelessness."

- Rural unitary

Local authorities also highlighted the lack of access to all types of housing; social, private rented sector and supported accommodation. Supported accommodation in particular is essential provision for young people. Housing services described having to compete with

children's social services, who are often trying to place care leavers, for very few units. Local authorities also raised concerns about the type and size of the available accommodation, particularly the availability of one bedroom properties.

"I would say the majority of our cases, the majority of our young people we manage to maintain even a temporary relationship with family and friends to keep them until a long term solution comes through but again it's back to the issue of housing stock so needing one bed accommodation potentially unless they're at work. It's difficult no matter what age you are."

- Rural unitary

Another key area of concern for local authorities was the introduction of Universal Credit, particularly being paid in arrears which often leads to rent arrears. This has made it increasingly difficult to foster confidence amongst landlords in the private rented sector. Whilst it is possible for rent to be paid directly to landlords in certain circumstances this is often viewed as being too little too late.

"I don't see how they can say that [Universal Credit isn't a problem]. At ground level it is a problem. Maybe the figures say rent arrears have gone down overall, but they're not accepting people in the first place so of course rent arrears is going to go down in UC because now [landlords] are much more wary when taking Universal Credit claimants on, there's affordability issues there"

- Rural unitary

One local authority highlighted credit checks as a barrier to the private rented sector. Credit checks were required for some private tenancies and if they came back negative it left applicants in an even worse financial situation. Financial capability in general is a key area of concern.

"People who require our assistance quite often have budgeting issues, have debt issues. Debt issues is more me thinking that people will fail credit checks to even get accepted into the private rented sector"

- Urban district

Will the Homelessness Reduction Act end homelessness?

"[The Act] has not built any houses, it has not made accessing the private sector any easier, and it's not made negotiating with landlords or parents any easier. So essentially there are no more solutions for councils to work with, we're just doing what we did before under a different framework"

- Rural unitary

The HRA has created a support model that focuses on the needs of the applicant, by extending the threatened with homelessness timeframe, introducing prevention and relief as statutory duties and providing these duties regardless of intentionality and priority status.

The Act provides support for groups that were not previously eligible for assistance, such as single applicants and couples without children. The new legislation has promoted a culture shift in council homelessness teams so that young people who previously fell through the gaps should now receive support through the prevention and relief duties.

"The old Act was punitive... over the years that created a culture within homelessness services. I think the HRA is now in the process of reversing that culture and about putting priority need and intentionality to one side to be considered later. Now the focus and the core of the case is the [Personal Housing Plan] and actually supporting the person, regardless of their level of vulnerability, or if they've brought the homelessness on themselves. But that's been a difficult transition for certain officers"

- Rural unitary

Structural and Staff Changes

A number of local authorities undertook significant structural and personnel changes. In doing so, local authorities were able to better transition into their new duties and facilitate the cultural shift needed to keep in line with the overall aim of the HRA.

"We've had a change in the way our team is structured. We had a restructure as many other councils did around that time, in order to best be prepared for the changes. The restructure happened slightly after the changes but for all intents and purposes we changed because of the changes in the Act"

- Urban district

Structural changes differed between local authorities. For instance, some councils created new roles or new teams based on their individual needs, such as triage teams undertaking the initial administration and signposting applicants to the correct service. Housing officers could then focus on casework. Private rented sector liaison teams were brought in to cultivate relationships with landlords. Young person's officers were introduced to support 16 to 24 year olds, working in partnership with children's services to conduct joint assessments for young people aged 16 and 17. Structural changes also included adaptations to staffing other than the creation of new roles. Some authorities targeted specific cohorts of applicants experiencing or at risk of homelessness.

"We also got a new service, the single homeless prevention service, which is designed specifically for the single cohort and then those that are childless couples and that really helped with the prevention."

- Urban London borough

In other instances the way that applicants interacted with the council changed so that each applicant would have one single housing officer so that they did not feel like they were being passed between services.

"We restructured to make it more of a streamlined service, so instead of having stages of the application, the customers get one officer from start to finish now. Before we had a triage service which would hand over homeless cases (when they would become homeless) to the Options Team, whereas now the Options Team cover that triage and early advice and then deal with the entire process"

- Urban district

Councils also encouraged a culture shift amongst their staff. They retrained their workforce and hired new staff with customer service experience where legacy staff were unwilling to take on the new approach. Across all approaches there was a consistent motivation to improve the experience of the applicant.

"Some people have struggled to adapt to the changes, we've had people who have left as it just wasn't for them. It's still an ongoing task; trying to get staff to work with the customer"

- Rural district

"Apart from one person, all of the team has been recruited since the change so we're dealing with people who haven't got much homelessness experience, a blank canvas in a way so you're not dealing with that old regime vs new regime mind-set."

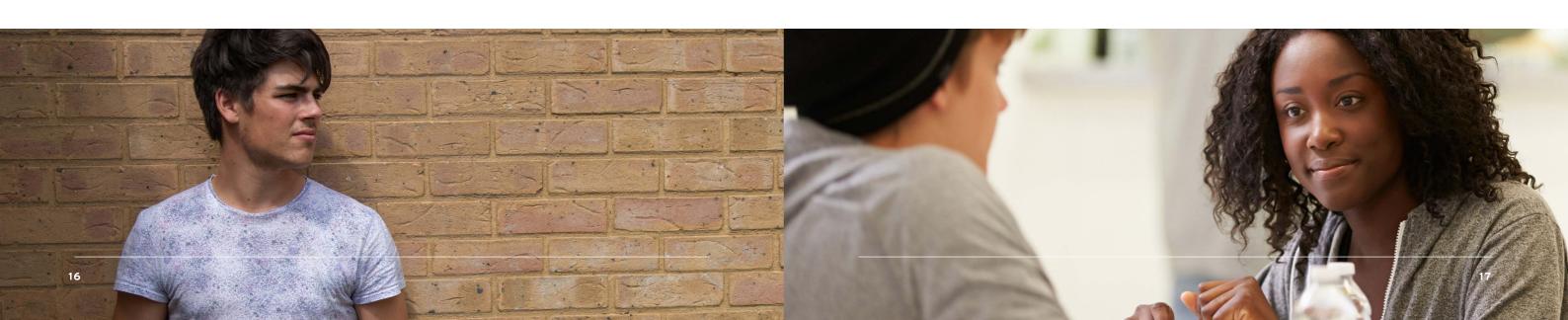
- Urban district

Whilst the framework has helped improve the standards for some, it has proved challenging for others. Before the introduction of the new legislation, a few local authorities had already moved towards a prevention and relief model.

"One of the main things I think everyone will say about the Act, is that it didn't bring any solutions for us, essentially it just gave us another framework to do what we were doing already. And I think that's where most of the frustration comes from with the administrative burden. Because the councils who were doing a good job anyway and were championing prevention, were already doing this with the customer just not in such a formalised way and the Act has formalised it"

- Urban unitary

Some of these councils struggled to continue their work within the confines of the new framework. Those with an established prevention and relief model expressed their frustrations regarding the administrative burden that is now paired with their continued prevention work.



"I think we benefitted from having a service that was quite prevention focused anyway, so it hasn't been a total 180 in terms of how we approach cases. It certainly increased the amount of paperwork and admin, because whilst there certainly wasn't gatekeeping, the amount of paperwork especially on priority cases has increased because they are now cases alongside any families or vulnerable applicants, the same amount of paperwork goes"

- Urban district

This has been particularly difficult for the councils who began to move away from a paper based working model and are now having to reacclimatise to the workload requirements of the HRA. In one case a council housing options manager described it as feeling like they've taken a step backwards.

"What they're asking from us for the H-CLIC return is overly detailed. Also, again because we had a good prevention pathway set up already we're finding we have to open a case, do an assessment, issue a couple of letters and do a personalized housing plan whereas previously we could have sorted them out there and then, and that would have been it. It isn't unmanageable and it's not unreasonable, it does give a good structure to what you're doing. But it is an increase in the amount of bureaucracy for some cases."

- Urban metropolitan borough

IT Systems and Data Recording

Local authorities reported problems with IT systems and data recording. Although the IT system and H-CLIC were integral to the implementation of the HRA, local authorities reported receiving insufficient support whilst transitioning onto the new IT systems.

"In terms of the submissions, I really struggled with those. Although you could ask for support, I still didn't find that terribly helpful. Effectively we were asking statisticians to tell people who are not statisticians what on earth things meant. There were so many errors in our first quarter submission, and we just couldn't work it out. It was only after the second submission that things started to fall into place. It was a case of muddling through"

- Rural district

The problems included a limited timeline to formally train front line staff, a lack of guidance, no standardisation of IT systems across councils, IT providers being unprepared and in many cases not understanding the HRA requirements well enough to provide functioning software.

"We're lucky in that we have a very good IT supplier who was able to very quickly implement quite complex schema that the government sent out. The government didn't recommend a supplier. If we'd have had to do it from a standing start we'd have struggled, they didn't give us much time for implementation"

- Urban metropolitan borough

At least one council interviewed had to trial multiple IT systems resulting in both limited funding and time being put into an approach that was later scrapped. Many of the concerns that were raised centred on the introduction of the H-CLIC data system as part of the HRA.

"The biggest change has been H-CLIC data recording, which is a lot more detailed and complicated than the previous P1E format. Very, very bureaucratic, takes a lot of work to implement it. Council workers around the country are still finding their feet with it"

- Urban metropolitan borough

In the first months of the HRA councils struggled with data collection and spent considerable resources to ensure that their data was reliable and up to date. One local authority described how H-CLIC is not compatible with their other IT system and they keep receiving confusing warning messages. The increased number of stages in a homelessness application has also led to a corresponding increase in the amount of data to be captured.

"A huge issue for me personally (because I was responsible for the H-CLIC inputting) was that it was horrific for a good couple of quarters' returns. Luckily, the more we've done and the more we've learnt, we were able to realized that our system wasn't quite tying itself in with H-CLIC, so the past couple of quarters have been much, much better"

- Urban unitary

"There was a big learning curve for the officers.

They were having to record a lot more data like quantitative data, drop downs and numbers and stuff than they've ever had to before. I think they were used to recording a small amount of that and doing the bulk of their work in case notes and letters"

- Urban unitary

Whilst most of the local authorities we talked with are now confident with the quality and reliability of their data there are a number who still face difficulties.

"We've noticed some discrepancies with what we think are the figures that come out of our data and then what they end up publishing. I'm sure that's the case with other councils. We sent them the raw data now and they extract from that the figures that they publish, whereas previously we'd do that extraction ourselves. There's a hundred different ways you can look at a data set and come up with different answers, I think there's a bit of that going on"

- Urban metropolitan borough

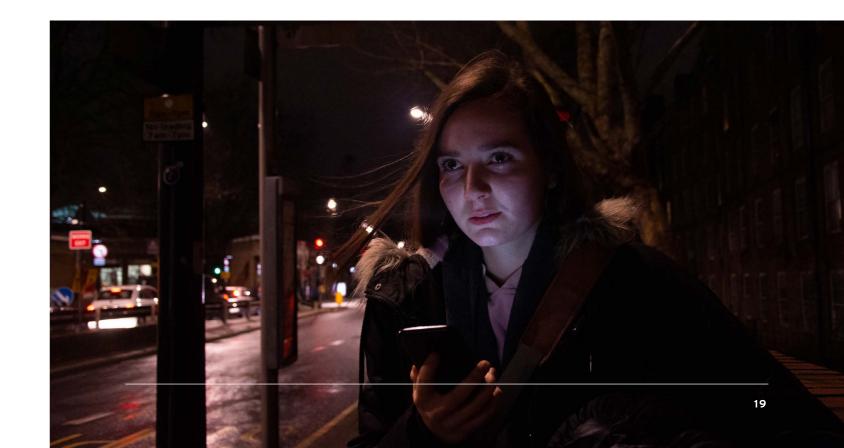
Central government cannot correctly assign resources to address homelessness without reliable data from local authorities. However, some described how it had been difficult to convince staff members of the importance of recording high quality data.

"At the end of the quarter we have to get our data off to central government, and you do find a lot of cases with missing information you can't back-track, so it will just get put down as 'other', and couple with that if you give case workers the option they'll normally just pick 'other'. Because they ask for so many boxes to be ticked and so much information for each case, the case worker will just put the easiest option in"

- Urban metropolitan borough

It is challenging for housing officers to conduct assessments sensitively whilst also collecting all of the required information. We observed front line triage officers at one local authority who struggled to engage with applicants face to face whilst inputting information into the computer. One council explained that housing officers took one day per week to complete admin and data input for cases worked over the rest of the week. A valuable day which could have been spent directly supporting applicants was lost.

Whilst significant work is being done to capture as much data as possible only a limited selection is currently published for England, compared to the statistical releases of the devolved nations. To understand and address homelessness more data should be published. Tools such as StatsWales or DWP's Stat-Xplore are good example of tools which allow the user to explore the data for themselves, creating breakdowns and exploring trends.



Conclusion

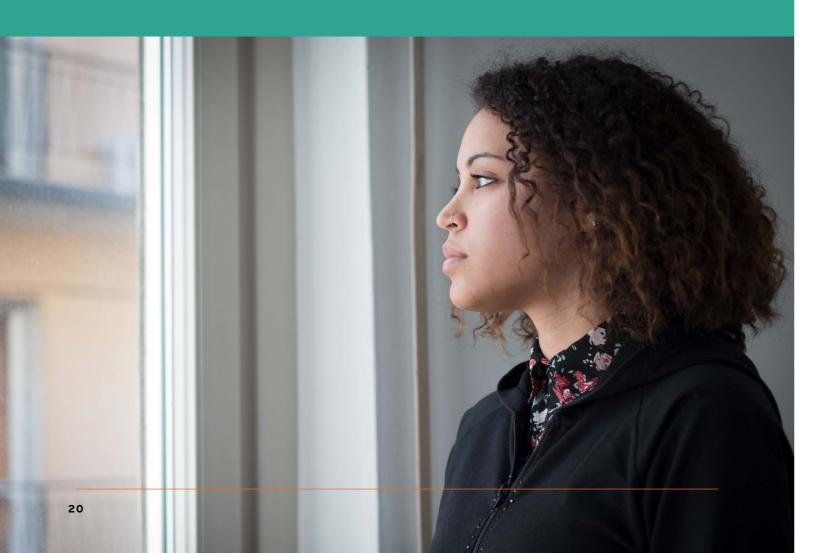
The Youth Homelessness Databank highlights the scale of youth homelessness in the UK. In 2018/19, an estimated 110,000 young people approached their local authority because they were homeless or at risk. This is only part of the total picture of youth homelessness. We need a complete picture to fully understand youth homelessness and how to end it. To do this the collection and publishing of data by central government must continue to be updated and improved year on year.

Youth homelessness will not be ended without an approach that takes into account the myriad factors that contribute to it, both within council housing services and beyond in the wider community. Whilst the HRA is a framework that has extended homelessness support to a substantially wider range of people, the Act alone will not end homelessness as it does not address wider structural causes.

The structural and staff changes taken forward by many local authorities has led to a positive culture change. This must continue as the ethos of the Act fully embeds and local authorities refine and embed their new practices. Whilst the first year of the HRA brought significant challenges relating to IT issues, interviews that Centrepoint conducted with councils suggest that these concerns are being addressed.

The Act has also brought significant administrative burdens. The language used in letters to applicants has proved complex and not at all user friendly, particularly for the most vulnerable claimants. More work is needed to ensure applicants receive tailored information that is easy to understand. Long term funding commitments are also needed so that local authorities can plan service delivery in the long term and ensure these services are adequately resourced.

Parts of the HRA and associated guidance have been vague. Now that the prevention and relief approach of the Act is becoming embedded in the work of local authorities, MHCLG should publish guidance in order to clarify and explicitly state requirements. This will mean that there is regional consistency to the support offered.



Recommendations

1. Central government should commit to extending the one-year Homelessness Reduction Grant allocation until the end of parliament, and calculate it in line with local needs and demand.

A longer-term Homelessness Reduction Grant funding settlement will allow councils to take a longer-term approach to the commissioning of their homelessness services, fully enacting the positive ethos of the HRA.

2. The government should launch a national online information hub, providing information about how to present to each local authority if homeless or at risk.

Approaching the council for help can be confusing without clear guidance about the process. An online information hub is essential, providing the address of each council to present in person alongside a phone number and email address as well as providing general advice for applicants.

3. MHCLG should review all written communication sent to applicants including Personal Housing Plans and notification letters to ensure they are clear and accessible to all audiences.

Communication sent to applicants has been described as confusing, too numerous, and difficult to understand. Reviewing and streamlining communication would empower applicants to fully understand and engage in the HRA process.

4. The Government should assess the feasibility of fast tracking applicants who are priority need upon initial assessment straight to the main housing duty assessment, enabling the most vulnerable to get the main housing duty much quicker.

The HRA aims to prevent or relieve homelessness upstream. However, local authorities expressed frustration at being unable to provide a main duty immediately for some of the most vulnerable claimants, who they felt would be better supported under the main duty.

5. MHCLG should add presentations to the list of data points collected by local authorities as the number of initial assessments is not a true representation of the scale of people seeking help.

As there is drop off between presenting to the council and the initial assessment, MHCLG should collect and publish presentation data to highlight the true scale of homelessness. Having both data points would also reveal whether all those who present are receiving the initial assessment they are entitled to.

6. MHCLG should publish data on an online interactive tool that would enable more analysis of homelessness trends, including demographic breakdowns.

An interactive data tool similar to Stats Wales's homelessness tool, or DWP's Stat-Xplore, would enable H-CLIC data to be more easily turns into actionable insights that will help services, including councils, charities, and government departments to make data informed decisions.

Technical Appendix

Homelessness policy in the UK is devolved in the four individual nations, each having independent policy that inform their different data collection policies. At present the English government does not publish data broken down by age with the exception of a combined prevention and/or relief duty owed, which does not allow for an understanding of the scale of youth homelessness. Therefore Centrepoint sends a freedom of information request to every local authority in England in order to collect a more complete dataset. This data is combined with publicly available data from Northern Ireland, Scotland, and Wales in order to build a complete picture for the UK.

This year saw a high response rate to Centrepoint's Freedom of Information request. Additionally the majority of those councils that responded to our request were able to provide some or all of the data requested, helping to

produce the most complete picture to date on the scale of youth homelessness. However, a significant number of those who did respond were unable to provide data due to our request exceeding the 18 hours allocated for Freedom of Information requests often because issues with IT systems had meant the request would had to have been carried out manually.

Some local authorities were not able to provide data on the number of 16 to 17 year olds approaching them for help. This was in cases where young people were supported by Children's Services, but the council was only able to direct the freedom of information request to the housing department.

The table below shows the response rates across each question in the freedom of information request in England. In total there are 326 local authorities in England.

% of local authorities	Data provided
83%	presented to their council as they are homeless or at risk (272)
84%	were assessed for a prevention or relief duty under the Homelessness Reduction Act 2017 (275)
82%	received an initial assessment of being owed a prevention duty (268)
83%	received an initial assessment of being owed a relief duty (270)
83%	had a successful prevention duty outcome (269)
80%	had a prevention duty end leading to a relief duty (262)
81%	had a prevention duty end for any other reason (263)
83%	had a relief duty end successfully (269)
80%	had a relief duty end for any other reason (260)
79%	assessed under the Housing Act 1996 (257)
83%	accepted as statutorily homeless and owed a housing duty by their council (270)
74%	responded to all parts of the Freedom of Information request (241)

Estimating the scale of youth homelessness

Centrepoint's annual estimate of the scale of youth homelessness in the UK is based on responses to the Freedom of Information request query about the number of young people presenting to each local authority in England as they were homeless or at risk, in addition to the same measure across the devolved nations. The calculation uses data from the 84 per cent of councils in England who provided this data and uses this as the basis of an estimate of the number of young people presenting in the local authorities which did not respond.

A data quality audit was carried out on each local authority that provided data. Councils where figures at one stage exceeded the numbers upstream were contacted to explain the discrepancy. Data received as part of the freedom of information request was compared to the only publicly available MHCLG data with age breakdowns, prevention and relief duties owed (currently considered an experimental dataset), where there was a discrepancy this was queried with the local authority. The responses Centrepoint received frequently emphasised the lack of clarity and confidence around the central government data returns. Due to the myriad changes in brought in as a result of the HRA it has not been possible to rely on figures from previous years to inform the data quality audit.

A selection of variables related to the structural factors understood to affect the rates of homelessness, including house affordability and access, benefit uptake, and poverty indicators, were used based on a MHCLG and DWP commissioned feasibility study around the

measurement and prediction of homelessness to create a prediction model for the councils with known and verified presenting figures. These variables were all sourced from government data publications and needed to be available at a local authority level so that they could be appended to the presenting data.

A log-transformed multiple linear regression model was chosen, meaning that the natural logarithm was taken of all variables before modelling the relationships. This had multiple benefits, primarily it ensured that the data met all the assumptions of linear regression and, secondly, it improved the linearity of the relationships between the presenting data and the significant predictor variables.

(Intercept)	-3.09***
Log(House Affordability)	0.37**
Log(Housing Waiting Times)	0.16**
Log(Children in Low Income Families)	0.17*
Log(Claimants Aged 16-24)	0.60***
Log(Social Units)	0.10*
Adj. R^2	Adj. R^2
Num. obs.	264
RMSE	0.66

^{***} p < 0.001, ** p < 0.01, * p < 0.05

House affordability viii: This measure, compiled annually by the Office for National Statistics, compares median income in the local authority to the median house price.

Housing waiting times ix: The numbers of households on local authorities' housing waiting lists, in England, by district. This data is published by MHCLG.

Children in low income families xi: The children in low income families predictor measures the percentage of children (under 16 years old) who are in families with an income at less than 60 per cent of the median. The data is produced by HM Revenue and Customs.

Claimants aged 16-24 xii: The number of people (16-24) claiming Jobseeker's Allowance plus those who claim Universal Credit and are required to seek work and be available for work. Published by the Office of National Statistics.

Social units x: The total social rented units owned by each local authority in England, compiled by the regulator of Social housing.

It was not, possible to obtain robust local authority level data on personal factors that contributed to homelessness nor was it possible to get sufficient data on the fragmentation of families. It should be noted that although they inform the estimate, it is not possible from this alone to infer any causation from this report, in either direction. For example, we cannot conclusively say that an increase in these factors would cause an increase in the number of young people approaching their council or vice versa. We would however support any further research into how these could affect the scale of youth homelessness in the UK.

The final model was then run on those local authorities who had not provided a (valid) presenting figure in response to Centrepoint's freedom of information request. This process output a prediction for the log transformed presenting figure for all local authorities. This was then back-transformed to create a presenting figure in the correct units, i.e. as a count of people. The back transformation exponentiated the original output, taking into account also a correcting term to account for any bias in the error terms. Where the estimate was lower than other downstream data points that were provided these were substituted in. The final estimate of the scale of youth homelessness in England was calculated by summing the known presenting figures in local authorities that responded to the request with usable data, and the estimated presenting figure for those local authorities that did not. This produces the estimate of 91,500 young people who presented to their council as they were homeless or at risk.

Equivalent data collected in previous years (the Databank holds data dating back to 2012/13) allows for a comparison over time to understand any changes in the scale of youth homelessness at a local and national level. These calculations consider those local authorities that have provided comparable data for multiple years. Due to a number of councils changing the definitions of what data is returned, or their internal processes, only data from 2017/18 and 2018/19 is included in this analysis. This ensures that the comparisons made are valid and reflect only actual change in the scale of youth homelessness. In total, data from 226 councils was used in assessing change over time.

For the UK wide estimate of youth homelessness, the England figure was added to the total number of young people presenting in Scotland, Wales and Northern Ireland. This data was obtained from central sources in each of the nations. All nations here reported that all young people who were presented were also assessed and therefore this data is reflective of assessments. In Northern Ireland, a slightly different reporting structure means that the data represents all young people aged 16-25 years old, as opposed to the age band of 16-24 years old used throughout the rest of this research.

Reasons for loss of last settled accommodation

Centrepoint also sent a freedom of information request directly to MHCLG in order to collect information on young people's reasons for loss of last settled accommodation in England in 2018/19. Through this we are able to obtain data relating to 98 per cent of local authorities. This is a sizable increase on last year were we obtained data at local authority level but were only able to collect data for 75 per cent of councils. This data only includes those who were assessed and not those who presented and were not subsequently assessed.

By centralising our request for this data from individual local authorities to one request to MHCLG we were able to make the council request more extensive. This does however mean that we are no longer able to provide information of the reason for loss of last settled accommodation at council level. In previous years this data saw little regional variation.

Data was broken down by London boroughs in comparison to the rest of England. The breakdown of reasons for loss of last settled accommodation were largely similar. However London saw a higher ration of Friends or family no longer willing or able to accommodate, other reason and Left institution with no accommodation available. With the Rest of England seeing higher proportions for the remaining categories.

It is important to note that loss of last settled accommodation only provides insight into the applicant's most recent housing situation and may not cover the original reason for that applicant experiencing homelessness. For instance Friends no longer willing or able to accommodate is unlikely to be the first instance of homelessness and rather another cause of homelessness has led the applicant into sofa surfing at friends' houses and then an approach to their council.

Interviews with Councils

Alongside the freedom of information requests, twelve qualitative interviews with local housing authority staff, including front line officers, managers, and heads of departments, were also conducted. The local authorities requested to take part in this process were chosen so as to ensure a reasonably representative subset of council type as well as urban and rural classification.

Urban & Rural Classifications			
England Boroughs	Sample Boroughs		
15% Rural - 80	8% Rural - 80		
13% Rural - 50	17% Rural - 50		
17% Significant Rural	8% Significant Rural		
30% Other Urban	42% Other Urban		
3% Large Urban	8% Large Urban		
23% Major Urban	17% Major Urban		

Borough Types			
England Boroughs	Sample Boroughs		
10% London	8% London		
11% Metropolitan	17% Metropolitan		
62% Shire District	42% Shire District		
17% Shire Unitary	33% Shire unitary		



End notes

- i. The Prevalence of Rough Sleeping and Sofa Surfing Amongst Young People in the UK https://core.ac.uk/download/pdf/77415475.pdf
- ii. Statutory homeless data for Wales is published here: https://statswales.gov.wales/Catalogue/Housing/Homelessness/Statutory-Homelessness-Prevention-and-Relief
- iii. Youth homelessness data for Scotland is published here: https://www2.gov.scot/Topics/Statistics/Browse/Housing-Regeneration/RefTables/adhoc-analysis
- iv. Population estimates by age according to ONS calculations by age for 2018 can be found at https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates
- v. The 2011 Rural-Urban classification of local authorities was used to classify each into one of the following: Largely Rural, Mainly Rural, Urban with City and Town, Urban with Major Conurbation, Urban with Minor Conurbation, Urban with Significant Rural. The full classification can be found here: https://www.gov.uk/government/statistics/2011-rural-urban-classification-of-local-authority-and-other-higher-level-geographies-for-statistical-purposes
- vi. LSE's The Cost of Homelessness Services in London report https://www.londoncouncils.gov.uk/our-key-themes/housing-and-planning/homelessness/cost-homelessness-services-london
- vii. MHCLG and DWP 2019 (Three reports published in March 2019 by Alma Economics and commissioned by MHCLG & DWP to review the evidence on the causes of homelessness and to provide options for modelling to appraise policy) https://www.gov.uk/government/publications/causes-of-homelessness-and-rough-sleeping-feasibility-study
- viii. House Affordability statistics can be found at https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoresidencebasedearningslowerquartileandmedian
- ix. Number of households on housing waiting lists can be found here: https://www.gov.uk/government/statistical-data-sets/live-tables-on-rents-lettings-and-tenancies
- x. Statistics on social rented units owned by local authorities can be found at https://www.gov.uk/government/statistics/statistical-data-return-2018-to-2019
- xi. Data on children in low income families can be found via PHE's interactive data tool at https://fingertips.phe.org.uk/profile/wider-determinants/data#page/9/gid/1938133043/pat/6/par/E12000004/ati/101/are/E06000015/iid/92772/age/-1/sex/-1
- xii. Data on young people claiming benefits can be found via the nomis official labour market statistics tool at https://www.nomisweb.co.uk/customerrors/nodataset.asp
- $\textbf{xiii.} \ \ Crisis: Cover\ the\ Cost\ -\ https://www.crisis.org.uk/media/240377/cover_the_cost_2019.pdf$



Centrepoint Head Office, Central House, 25 Camperdown Street, London E1 8DZ Tel 0800 23 23 20 Fax 0845 466 3500 www.centrepoint.org.uk

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