

YOUTH-SPECIFIC GUIDANCE:

Report and Chapter for
Inclusion in the Homelessness
Code of Guidance



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YOUTH-SPECIFIC GUIDANCE: REPORT AND CHAPTER FOR INCLUSION IN THE HOMELESSNESS CODE OF GUIDANCE

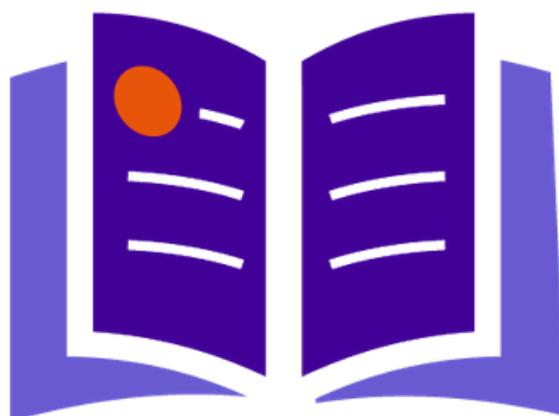
SUMMARY

The Homelessness Code of Guidance provides statutory guidance to local housing authorities on the delivery of their homelessness functions. Authorities are legally required to have regard to the Code when making decisions and it carries significant weight in interpreting how statutory duties should be applied in practice. Centrepoint has long campaigned for the Homelessness Code of Guidance to be amended to include a dedicated chapter on young people which would clarify local authorities' obligations at the point of presentation, initial interview, and assessment, and ensure greater consistency in understanding what constitutes acceptable practice.

In December 2025, the Ministry of Housing, Communities and Local Government (MHCLG) unveiled the National Plan to End Homelessness, which included a commitment to introduce a dedicated youth chapter within the Homelessness Code of Guidance.[i] The inclusion of a youth-specific chapter would help local authorities to recognise the distinct nature of youth homelessness and clarify their duties under homelessness legislation, so that they can effectively fulfil their responsibilities to young people. The chapter has the potential to reduce the risk of vulnerable young people being turned away due to resource pressures. It would also strengthen the ability of young people and their advocates to challenge gatekeeping and ensure they receive the support to which they are entitled, by enabling them to refer to explicit guidance that clearly sets out local authorities' duties.

Centrepoint has collaborated with the law firm Herbert Smith Freehills Kramer, as well as 12 sector partners, including Become, Coram, Crisis, Depaul, Herts Young Homeless, Homeless Link, LSE: Housing and Communities, New Horizon Youth Centre, Shelter, St Basils, YMCA, and young people to develop a youth chapter suitable for insertion into the Homelessness Code of Guidance. We are calling on MHCLG to include our proposed chapter into the Homelessness Code of Guidance in order to ensure that young people's needs and vulnerabilities are properly recognised, and that local authorities are equipped to provide appropriate, consistent, and effective support.

The report below outlines the key issues regarding local authority youth homelessness support, as identified in interviews and focus groups with youth homelessness sector staff and young people with lived experience of homelessness, and highlights how these issues are reflected in the proposed chapter.



INTRODUCTION

Under the Homelessness Reduction Act 2017 (HRA), everyone in England approaching their local authority for help because they are homeless or at risk of homelessness is entitled to an assessment of their housing needs. However, a significant discrepancy exists between the number of young people presenting as homeless and those who are formally assessed. Centrepoin’s latest Youth Homelessness Databank found that over a third (35 per cent) of the young people who approached their local authority in England in 2024/25 were not assessed for eligibility.[ii]

Although some of these discrepancies may result from young people not meeting the eligibility threshold for assessment and support, evidence from Centrepoin’s Helpline indicates that many local authorities are employing practices that unfairly restrict access to homelessness services.[iii] For example, young people are frequently being refused an assessment as they are deemed to be intentionally homeless, have no local connection or to not to be in priority need. The data reveals a concerning pattern of unlawful gatekeeping practices that increase the risk of homelessness among vulnerable young people.

Some gatekeeping practices may be linked to local authorities not fully recognising the different experiences and needs of young people compared with older applicants. Young people often experience homelessness as a result of family breakdown, which is frequently associated with domestic abuse, and may also experience hidden forms of homelessness, such as sofa surfing.[iv] These circumstances may not always be given sufficient weight, and young people often report feeling that their situations are not clearly understood by local authorities.[v] In addition, young people are often asked to provide disproportionate and unreasonable levels of evidence at the point of initial presentation. This can include being directed to obtain confirmation of homelessness from a parent or family member, even in cases where returning to the household would expose the young person to a risk of abuse or harm.



It is widely recognised that local authorities are operating under significant financial pressure, which can contribute to the rationing of resources and the use of gatekeeping practices. Centrepoin commissioned WPI Economics to calculate the amount of additional funding local authorities would have needed to meet their obligations under the HRA to assess and provide a relevant duty where necessary to all young people who present to homelessness support services in 2023/24. The analysis shows that English councils would need to see an additional £400 million in funding from central government to ensure that all young people who report to homelessness support services receive an assessment and support if required.[vi] Considering this, the Government’s commitment to boost spend on homelessness support to £3.5 billion is welcomed, as is its plan to protect prevention and relief activities through diverting temporary accommodation funding away from the Homelessness Prevention Grant (HPG). Once the proposed funding structures have been implemented, the Government should seek to ensure sufficient funding is provided to local authorities across all regions based on reviews of need, including that of young people.

Regardless, constraints on resources should not result in vulnerable young people being turned away without appropriate support. In a survey of 28 homelessness charities across England, 90 per cent agreed that the Homelessness Code of Guidance as it currently stands leaves too much room for Local Authorities to reject cases because of a lack of resources.[vii] The Homelessness Code of Guidance provides statutory guidance to local housing authorities on the delivery of their homelessness functions. Local authorities are legally required to have regard to the Code when making decisions, and it plays a significant role in shaping how statutory duties are interpreted and implemented in practice. The Code does not replace legislation but explains how housing duties should be applied in practice.

Over time, the Homelessness Code of Guidance has been amended to reflect changes in legislative duties and expanded to provide tailored guidance on delivering homelessness services to people with particular vulnerabilities, including survivors of domestic abuse and care leavers. However, there is currently no chapter that outlines guidance on providing homelessness services to young people. Centrepoin has long advocated for the Homelessness Code of Guidance to be amended to include a dedicated chapter on young people. Such a chapter would clarify local authorities'



obligations at key stages, including presentation, initial interview, and assessment, and promote greater consistency in the interpretation and application of housing legislation when supporting young people.

In December 2025, the MHCLG unveiled the National Plan to End Homelessness, the cross-government strategy on homelessness and rough sleeping.[viii] Within the strategy, the government committed to introducing a dedicated youth chapter in the Homelessness Code of Guidance and to developing a Youth Homelessness Prevention Toolkit which will serve as a best practice resource for local authorities, going beyond legal duties to clarify the most effective ways to support young people experiencing or at risk of homelessness. The introduction of a dedicated youth chapter would enable local authorities to recognise the distinct characteristics of youth homelessness and clarify their statutory duties under homelessness legislation, thereby supporting the effective fulfilment of their responsibilities to young people. The chapter has the potential to reduce the risk of vulnerable young people to be turned away due to limited local authority resources and, where young people are unlawfully turned away, provide young people and their advocates with a clear reference to challenge gatekeeping and ensure access to the support to which they are legally entitled.

Additionally, the Youth Homelessness Prevention Toolkit should further support this aim by providing practical guidance to promote high quality support to young people when they approach their local authority. However, for these to be effective, the chapter and toolkit must include the appropriate key information and clearly reflect the distinct vulnerabilities of young people, as well as the principles and approaches required to support them within the homelessness system.

Centrepoint has collaborated with Herbert Smith Freehills Kramer, as well as 12 sector partners including Become, Coram, Crisis, Depaul, Herts Young Homeless, Homeless Link, LSE: Housing and Communities, New Horizon Youth Centre, Shelter, St Basils, and YMCA, and young people to develop a youth chapter suitable for insertion into the Homelessness Code of Guidance. We are calling on MHCLG to include our proposed chapter into the Homelessness Code of Guidance. It is essential that the youth chapter reflects the necessary provisions and approaches to ensure that young people's needs and vulnerabilities are properly recognised, and that local authorities are equipped to provide appropriate, consistent, and effective support.

This report outlines the key issues regarding local authority youth homelessness support, as identified in interviews and focus groups with youth homelessness sector staff and young people with lived experience of homelessness, and highlights how these issues are reflected in the chapter. This is followed by the full draft chapter that we propose for insertion into the Homelessness Code of Guidance. The final section sets out several future recommendations which could not be included in the proposed chapter at this stage, as they are not currently reflected in legislation. We strongly believe that implementing these recommendations will strengthen policy frameworks for supporting homeless young people and improve their access to sustainable, long-term accommodation. As such, these recommendations will inform future campaigning, with the aim of securing their inclusion in the chapter once they are reflected in legislation.

STATUTORY FRAMEWORK

- Housing Act 1996 (Part VII): Establishes the legal framework for assessing homelessness, eligibility, priority need, intentionality, and the main housing duty owed by local authorities.
- Homelessness Reduction Act 2017: Strengthened duties by introducing prevention and relief obligations, requiring earlier intervention and personalised housing plans for all eligible applicants.
- Children Act 1989: Places duties on children's services to safeguard and promote the welfare of children in need, including accommodation duties for 16–17-year-olds and ongoing responsibilities to care leavers.

LOCAL AUTHORITY DUTIES AND HOMELESSNESS PATHWAY

Application

The homelessness process begins when an individual approaches the local authority and provides information indicating they may be homeless or at risk of homelessness.

Applications can be made to any department of the local authority and expressed in any form. At this point, the council is legally obliged to take a homelessness application. This initial stage allows the authority to formally record the individual's circumstances and begin the process of assessing their needs and entitlements. The application is the gateway to all further duties and support.

Assessment

Once an application has been made, the council must carry out a thorough assessment of the applicant's circumstances. This includes establishing their current housing situation, understanding the reasons for homelessness or threatened homelessness, and identifying any vulnerabilities or support needs. The assessment should be conducted promptly, with current guidance recommending a full written decision within 33 working days. During this stage, the council also explores potential options to prevent homelessness where possible.

Priority need and interim accommodation

Priority need is a legal category that determines who the local council must provide emergency accommodation for if they are homeless. Once the council has reason to believe that an applicant may be homeless, eligible for assistance and have a priority need, they must provide interim accommodation immediately while inquiries are completed. People considered to have priority need include households with dependent children, pregnant women, individuals who are vulnerable due to old age, disability, or another special reason, those who are homeless because of an emergency such as a fire or flood, and certain young people aged 16 - 17 as well as care leavers under 21.

Prevention duty

The prevention duty applies to individuals who are at risk of becoming homeless within the next 56 days. The council must take reasonable steps to help the applicant retain their current accommodation or secure alternative housing. This involves creating a Personal Housing Plan, which outlines support from the council and actions the applicant will take to remain in their current home or secure new accommodation.

Relief duty

The relief duty applies to individuals who are already homeless and lasts for up to 56 days. During this time, the council must take reasonable steps to help the applicant secure accommodation. Even if the applicant is not in priority need, they are entitled to receive advice, support, and active assistance under this duty. The relief duty ends if suitable accommodation is secured, the applicant refuses an offer, or the 56-day period expires without suitable accommodation being secured.

Local connection

A local connection is a link that someone has to a particular council area and determines which council is primarily responsible for assisting with homelessness. A local connection can exist if a person currently lives in the area (usually at least six months in the last year or three of the last five years), works in the area (employment of at least 16 hours per week),

has close family such as parents, adult children, or siblings in the area for at least five years, or has special circumstances, for example needing medical care or support services in the area. Importantly, having a local connection does not prevent a council from assessing a person's homelessness situation; it mainly affects which council carries out the relief and main housing duty.

Main housing duty

Following the assessment and completion of prevention or relief duties, if the applicant is found to be homeless, in priority need, and not intentionally homeless, the council has a main housing duty. This requires the authority to secure suitable long-term accommodation, such as social housing or a private tenancy for at least a year.

METHODOLOGY

- A policy and literature review was conducted to examine existing research on young people's access to homelessness support from local authorities to ensure the chapter was informed by established evidence and identified policy and practice gaps.
- Interviews and focus groups were conducted with 12 young people with lived experience of homelessness to inform the development of the chapter.
- Focus groups were held with 12 sector partners, who were consulted both prior to and throughout the drafting process to ensure the chapter reflects sector expertise and practice.
- Focus groups were also conducted with 12 internal stakeholders across Centrepoin't's Legal, Helpline, Rough Sleepers' Complex Case Service, and London and North East supported accommodation teams, who were consulted at key stages to incorporate operational and frontline perspectives.

CORE COMPONENTS OF THE YOUTH CHAPTER

VULNERABILITY

The focus groups highlighted the need to be mindful of the potential vulnerabilities of young people and to ensure these are considered by local authorities at every stage of providing support to those experiencing homelessness. Accordingly, the draft chapter begins with a framing section which outlines the circumstances in which young people may be more vulnerable than other adults if they were to become homeless (e.g. their inexperience, lack of previous support or established support networks, lack of control, autonomy and personal resources, any history in the care system, and intersection with a minoritised community).[1] Placing this section at the beginning encourages local authorities to keep young people's unique vulnerabilities in mind as they read the rest of the chapter and consider how to support them at every stage.. There is also specific guidance on assessing young people's vulnerability in terms of priority need later in the proposed chapter.[2]

INEXPERIENCE

Staff and young people noted that young people are often more vulnerable as they are less likely to have as much experience as older adults in terms of managing their own finances, a household budget, taxes, and legal relationships (such as being a tenant). For example, young people can often make decisions that are not in their best interests due to a lack of experience and understanding of the way formal structures operate. Colleagues disclosed issues around young people being given intentionally homeless decisions after leaving a property on the date stated on their Section 21.

By virtue of lack of experience, not knowing what the deal is. You get notice from your landlord saying you need to be out by the end of the month. Why wouldn't you take that on face value rather than expecting the young person to know they are entitled to carry on staying until the courts ruled against it. Of course they're not going to know that. So there's something about assuming a higher level of knowledge.

**CENTREPOINT HELPLINE
STAFF MEMBER**



In response, the chapter lists inexperience within the vulnerability section[3] and additionally contains guidance that "Generally, authorities should not consider the acts or omissions of a young person that lead to homelessness to be deliberate where they are vulnerable or have experienced instability (for example, homelessness following a relationship breakdown affecting their living arrangements or domestic abuse)."[4]

Separately, the chapter also contains an expectation that the authority's information and advice provision should contain "practical information (such as on tenancies and the eviction process)".[5]

1. See paragraphs 23.2 to 23.4
2. See paragraph 23.24(b)
3. See paragraph 23.3(a)
4. See paragraph 23.25(c)
5. See paragraph 23.5

LACK OF PREVIOUS SUPPORT OR ESTABLISHED SUPPORT NETWORKS

Focus groups discussions with Centrepoint and sector staff highlighted young people's vulnerability relating to their lack of previous support and established support networks. For example, young people are less likely to have had as many experiences as older adults with formal and statutory services due to their age, which can make it more difficult to evidence issues relating to mental or physical health that increase their vulnerability.

I think young people are often less likely to have had so many kind of touch points with health and social care services as older people and are less likely to know how to engage proactively with those services and so probably will lack evidence of additional vulnerabilities beyond being young.

**YOUTH HOMELESSNESS
RESEARCHER**



As such, the chapter identifies and explains this issue as a form of vulnerability[6] and makes clear that authorities should be mindful of the potentially limited availability of evidence where a young person has not previously received support.[7] It also provides guidance requiring authorities to take a flexible approach and to work with the young person to determine reasonable and proportionate alternative forms of evidence where this lack of touch points affects its availability.[8]

LACK OF CONTROL AND AUTONOMY

Centrepoint and sector staff noted in focus group discussions that young people may be vulnerable due to the lack of control and autonomy over their own lives. For example, they are less likely to have had a say in how their lives have progressed, for example how long and where they have previously lived, and are less likely to have adequate resources than other adults to make their own decisions. Young people who may have had impermanent housing during childhood could be less likely to have a local connection.

It almost feels like it disadvantages the young person if they've had a fairly transient home life where their parents have had to move or they've not built up five years connection.

**CENTREPOINT HELPLINE
STAFF MEMBER**



As such, the chapter lists this issue within the initial vulnerability framing section[9] and further highlights that an inquiry into whether a young person has a local connection is discretionary, not mandatory, and that "young people are likely to have had less autonomy and control over the decisions on where they live and less time to form traditional bonds in an area through employment or residence." [10]

The chapter also states that the prevention and relief duties are owed irrespective of whether a local connection is established as this is frequently a reason for young people being refused an assessment,[11] which constituted 11 per cent of all forms of gatekeeping instances recorded by Centrepoint's Helpline between August 2024 - July 2025).[ix]

6. See paragraph 23.3(b)

7. See paragraph 23.16

8. See paragraph 23.26

9. See paragraph 23.3(c)

10. See paragraph 23.19

11. See paragraph 23.21

INTERACTION WITH THE CARE SYSTEM

Staff from homelessness sector organisations and young people described instances where care leavers missed out on support to which they were entitled. Therefore, the chapter lists care experience as a potential vulnerability of young people.[12] However, the Homelessness Code of Guidance already includes a chapter on care leavers, so the proposed youth chapter does not detail specific care leaver entitlements and instead refers readers to the existing care leaver chapter.

BELONGING TO A MINORITISED COMMUNITY

The focus groups highlighted the need for local authorities to consider the intersectionality and vulnerability of young people when supporting them with homelessness. For instance, participants emphasised that the intersection between LGBTQ+ identity and family breakdown should be explicitly addressed in the chapter, as many young people become homeless due to family rejection related to their sexuality or gender identity, and this should not result in an intentional homelessness decision. This is supported by research from Centrepoin, which found that young people who identify as LGBTQ+ were more likely to report frequent arguments with their parent(s) or carer(s) and experienced higher rates of abuse.[x]

For this reason, the framing section of the chapter outlines the vulnerability of LGBTQ+ young people and other minoritised communities.[13] Later in the chapter, guidance reiterates that a young person's specific needs, circumstances and vulnerabilities should determine whether it is safe for them to remain in their current home, stay in the area, or pursue reconciliation with family or other relatives.[14]

EXPLOITATION

Importantly, the focus groups emphasised the need to be mindful that young people are more vulnerable to exploitation, such as criminal or sexual exploitation, than older groups of people.

I think young people are more vulnerable to exploitation, particularly young people experiencing homelessness. So commercial or sexual exploitation or grooming into gangs can be much more easily done if someone doesn't have a stable home, don't have access to money and also at an age where you don't have as much experience of being out in the world and interacting with adults that you don't know. And interacting with people who seem like they're kind and they care about your wellbeing, and they want to help provide for you. And that's a very typical form of grooming. Young people especially care leavers who don't have experience of having a sort of older adult figure that wants to care for them, and then they end up in an exploitative situation because they also need a stable home or money to live on.

YOUTH HOMELESSNESS POLICY MANAGER



As such, the framing section specifically states that vulnerable young people are generally at a higher risk of abuse and exploitation than other adults and that this experience may mean that they make decisions against their own best interests which could affect their eligibility for support, and this should be taken into account by local authorities during initial and formal assessments.[15]

12. See paragraph 23.3(d)

13. See paragraph 23.3(e)

14. See paragraph 23.22

15. See paragraph 23.4

DUTY TO PROVIDE INFORMATION

Focus groups emphasised the need for local authorities to fulfil their existing duty to provide information, highlighting the importance of clearly accessible homelessness support information and face-to-face services, particularly for young people who may be less aware of where seek support. These issues have been highlighted within the chapter.[16] Another point raised specifically crucial to young people was the importance of making clear that advocates can support young people with their applications and dealings with local authorities, and that it should be clear how this support can be accessed, and which external organisations can help.

And highlighting the importance of an advocate because you know young people, their life experience will be such that they don't really understand the language that is being used, the consequences of what they say or don't say. So that's why it's really important.

YOUTH HOMELESSNESS SUPPORTED HOUSING MANAGER



The draft chapter includes wording that states that the advice available from voluntary sector organisations and the assistance they offer should be made available to young people (but is not a substitute for the authority's own duty). [17] It also highlights specifically that "Young people should be made aware that these organisations may support them in their dealings with the authority."

DUTIES OWED TO YOUNG PEOPLE AGED 16 AND 17

Many 16- and 17-year-olds who become homeless are not assessed or are housed under the wrong legislation (the Housing Act 1996 rather than Children Act 1989) with no practical or financial support from children's social care services.

They're supposed to do joint assessments together. It's supposed to be a social services and homelessness discussion, but I'm confident that at times, it's going to actually be going to be a competition between the two of them as to who's going to have to pick up responsibility for the young person.

RESEARCH LEAD AT A NATIONAL HOMELESSNESS CHARITY



To address this issue, the guidance emphasises that homeless 16- and 17-year-olds should receive a child in need assessment under section 17 of the Children Act 1989 and subsequently if found in need, owed a duty to be care housed under section 20 of the same Act.

However, the law relating to children in need is complex and difficult to comprehensively summarise in a short chapter on young people. The Government has issued specific statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless. Therefore, the chapter includes paragraphs which cross-refer to this guidance, outline how children's services and housing services should work together, and outline (at a high level) how duties under the Children Act 1989 and the Housing Act 1996 interact.[18]

16. See paragraph 23.5 and paragraph 23.13

17. See paragraph 23.6

18. See paragraphs 23.7 to 23.12

REQUESTS FOR HOMELESSNESS SUPPORT FROM YOUNG PEOPLE

Staff expressed concerns around how ‘reason to believe’ is being applied by local authorities. It was reported by several staff members that the bar for what is considered ‘reason to believe’ is made high by local authority staff, when it is set deliberately low to allow for local authority investigation over a 56-day period. Asking for unreasonable evidence at this stage is a form of gatekeeping.



It’s deliberately supposed to be a very low bar for entry because that’s what the whole 56-day period is for – gathering evidence to then make that informed decision.

**CENTREPOINT ROUGH SLEEPERS’
COMPLEX CASE SERVICE
STAFF MEMBER**



Often, young people are expected to provide evidence at the point of presentation, and in many instances have been turned away or denied emergency accommodation if they did not provide evidence at that point. Priority need is not just about what can be evidenced, vulnerability can be implied in a person’s behaviour/presentation.

Accordingly, the chapter addresses this, emphasising that that is a low threshold for ‘reason to believe’ which is likely to be triggered if it is apparent the young person is or may become homeless (for example, a report of relationship breakdown affecting their living arrangements)."[19]

The chapter also states that authorities should work with young people when it comes to evidence, be mindful of the common causes of youth homelessness and be sensitive to the potentially limited availability of evidence in these circumstances, and provide young people with a reasonable period of time to respond.[20] Separately, the chapter also provides that applications should not normally be decided in less than 5 working days to ensure decision are not being made without fair consideration and to allow the young person to provide the necessary evidence.[21]

The guidance says that it should be a low bar, but it just isn’t. Maybe we need to be more prescriptive in the way that we talk about reason to believe or priority need because obviously at the moment, the way that its worded in the guidance isn’t working.

CENTREPOINT HELPLINE STAFF MEMBER



19. See paragraph 23.13

20. See paragraph 23.16

21. See paragraph 23.17

THE PREVENTION AND RELIEF OF YOUTH HOMELESSNESS

Centrepoint staff and sector partners argued of the need to remind local authorities that they are obligated to provide support to young people who are eligible and are homeless/at risk of homelessness regardless of priority need and intentionality at the point of presentation. Frequently, Centrepoint's Helpline supports young people who have been refused an assessment as they were not seen to be in priority need and be intentionally homeless (139 and 13 cases respectively between August 2024 - July 2025).[xi]

To address this, the chapter emphasises that "Housing authorities are required to provide this assistance irrespective of whether that young person has priority need or is intentionally homeless".[22]

PRIORITY NEED

DOMESTIC ABUSE

It was reported that local authorities often do not treat familial domestic abuse, such as between siblings or a parent/caregiver and child, with the same seriousness as abuse occurring in romantic relationships. Centrepoint staff and sector partners noted that some authorities dismiss such incidents as "reasonable parental chastisement," thereby minimising the harm involved.

Additionally, there were concerns that young people are sometimes encouraged to return home even after disclosing experiences of abuse.

It's the way questions are phrased... particularly around safeguarding and particularly DV [domestic violence]... We ask open questions at Centrepoint, but we've had experience of young people being shut down [by local authorities], [such as] 'you will be safe at home, won't you?' rather than exploring further.

CENTREPOINT SUPPORTED HOUSING MANAGER



In response to this, the chapter provides specific guidance on the need to take disclosures of domestic abuse seriously, but especially when those disclosures involve family members, due to a young person's particular vulnerability in these circumstances. [23]

I think the problem is because of the way the parental relationship is perceived that abuse can be minimised or regarded as insignificant when it's between a parent and their child, it's almost like that's just seen as normal parenting. And I think they need to move away from that or be prepared to look at it very critically.

MEMBER OF LEGAL TEAM AT A NATIONAL HOMELESSNESS CHARITY



22. See paragraph 23.21

23. See paragraph 23.24(a)

THE PROVISION OF SUITABLE ACCOMMODATION

TYPE OF ACCOMMODATION AND SUPPORT

Concerns have been identified around the level of wrap-around support needed for young people experiencing homelessness. Often, young people are less experienced in accessing and managing accommodation by nature of their age. Young people are more likely to maintain their tenancies if there is appropriate support in place.[xii] Organisations like Centrepont provide young people with the skills to live independently through teaching them about managing their money, bills, accessing employment etc.

If people are being forced into the private rented sector when they're not ready, and they're not getting tenancy sustainment training, they're more likely to end up in arrears... it's a tricky situation if they're not being supported to move on in the right way.

YOUTH HOMELESSNESS RESEARCHER



Many young people have never had their own tenancies prior to becoming homeless or at risk of homelessness. With many local authorities looking to the private rented sector to accommodate homeless young people, there should be support offered to ensure these tenancies are maintained to prevent future homelessness or intentionally homeless decisions. For example, Centrepont has a

floating support team who can provide support to young people in their tenancies, and this can often prevent further accommodation breakdowns.

To highlight this, the chapter outlines that a young person's housing options should be assessed based on their preferences, needs, and circumstances, and lists supported accommodation and floating support as appropriate options.[24] The guidance also states the types of accommodation option which will not be appropriate for young people and highlights that Ofsted-registered supported accommodation options are required for 16- and 17-year-olds.

LOCATION

It was reported in focus group discussions that local authorities commonly make unreasonable offers of accommodation that are outside the area where the young person sought support.

We see really unreasonable offers of accommodation [including] putting people in different areas where they're not used to, and they've got no support network.

CENTREPOINT ROUGH SLEEPERS' COMPLEX CASE SERVICE STAFF MEMBER



Centrepont staff and sector partners said that young people can be offered accommodation in an entirely different local authority, over an hour away from their community. This is particularly concerning for young people, who by nature of age and vulnerability, should be near their support network or place of work or education. By refusing these offers of accommodation, young people often receive intentionally homeless decisions.

24. See paragraph 23.28

The chapter addresses this and explains that location is particularly important for young people.[25] The guidance states that local authorities should consider whether accommodation options are close to existing support networks (unless there are factors that mean that is not appropriate) and close to employment, education and training opportunities.

AFFORDABILITY

Staff and young people spoke about offers of accommodation being unaffordable due to young people having lower rates of pay and benefits compared to older adults. Young people (under 25) receive a lower Universal Credit rate and are often only entitled to the Shared Accommodation Rate of the Local Housing Allowance for their rent. Similarly, young people under the age of 21 currently receive a lower minimum wage than those aged 21 and over. Therefore, it is important for local authorities to consider young people's limited resources when offering suitable accommodation. The chapter highlights these affordability constraints and encourages local authorities to take this into account when looking for suitable accommodation for young people.[26]

CONCLUSION

Centrepoint welcomes the Government's commitment to introducing a dedicated youth chapter within the Homelessness Code of Guidance and recognises the significant opportunity this presents to improve how local authorities support young people experiencing homelessness.

We strongly recommend that the MHCLG adopts, or at minimum has regard to, our proposed chapter when developing the youth chapter, to ensure that the distinct vulnerabilities and support needs of young people are fully and appropriately reflected.

We firmly believe that our proposed chapter accurately reflects the lived experiences and key barriers faced by young people when seeking homelessness support, and that it represents both the perspectives of young people themselves and the collective expertise of organisations working across the youth homelessness sector.



26. See paragraph 23.30

THE YOUTH CHAPTER

CHAPTER 23: YOUNG PEOPLE

23.1 This chapter provides guidance on the vulnerabilities of young people aged 16 to 25 who are homeless or threatened with homelessness and how the duties owed to them should be exercised.

Vulnerability of young people

23.2 The most common causes of young people presenting as homeless are relationship breakdown affecting their current living arrangements, and domestic abuse. This includes situations where family (parents, step-parents or other relatives), friends or carers are no longer willing or able to house them, and where it is no longer safe for them to remain in a situation due to abuse.

23.3 Local authorities should have regard to the fact that young people may be more vulnerable than other adults who present as homeless or threatened with homelessness. Young people may be vulnerable as a result of their:

- a. inexperience. They are more likely to lack the skills and experience that would enable them to manage their own finances, a household budget, taxes, and legal relationships (such as being a tenant), and often require additional help and support with day-to-day tasks;
- b. lack of previous support or established support networks. They are more likely to have been unable to address their support needs, and lack the support, advice and guidance from family, friends, carers or mentors that may be available to other adults;
- c. lack of control and autonomy. They are more likely to have had less say in how their lives have progressed, and have been at the mercy of decisions made by other adults. They are also likely to have more limited resources than other adults to make their own decisions;
- d. interaction with the care system. The events leading to a young person becoming looked after, and their experiences while in care, mean they are more likely to be vulnerable than other adults. See Chapter 22 for further guidance on care leavers; and,
- e. belonging to a minoritised community. LGBTQ+ young people are more likely to experience homelessness as a result of rejection and abuse based on their gender identity or sexual orientation. Specific factors that impact a particular minoritised community, such as views on interfaith or intercultural relationships, forced marriage, honour-based abuse or FGM, also impact a young person's vulnerability and their ability to stay in their current home.

23.4 A young person's vulnerability can have a direct and substantial impact on their ability to take action to help prevent or relieve their homelessness. Vulnerable young people are generally at a higher risk of abuse and exploitation than other adults and may make decisions against their own best interests. Vulnerability also impacts whether the reconciliation of a relationship is possible. Authorities should assess and consider the impact of vulnerability in exercising any duties in relation to a young person.

Duty to provide information

23.5 A housing authority's information and advice provision under [section 179\(1\) of the 1996 Act](#) should be designed to meet the needs of young people. It should be age and gender appropriate, culturally and emotionally sensitive, and easily accessible in a centralised location. It should seek to address young people's vulnerabilities and the circumstances that led to their homelessness, and provide practical information (such as on tenancies and the eviction process), recognising the minimal life experience they will have had. See [Chapter 3](#) for further guidance.

23.6 A housing authority's information and advice provision should refer to the advice and assistance available from voluntary sector organisations such as Shelter, Streetlink, the No Accommodation Network, Centrepoint, Citizens Advice, Childline and other similar organisations. Young people should be made aware that these organisations may support them in their dealings with the authority. However, such advice and assistance should supplement the authority's own information and advice provision, as it does not relieve the authority from its duty under section 179 of the 1996 Act.

Duties owed to young people aged 16 and 17

- 23.7** Local authorities owe specific duties to young people aged 16 and 17 which are detailed in the Government's statutory guidance: 'Prevention of homelessness and provision of accommodation for 16 and 17 year old young people who may be homeless and/or require accommodation'. This guidance makes clear that:
- a. when a 16 or 17 year old is homeless or threatened with homelessness, they are first and foremost a child and therefore children's services have the primary duty to them; and,
 - b. there is a legal framework for co-operation between children's services and housing services to meet the needs of children and young people.
- 23.8** Local authorities are required by the Children Act 1989 to take reasonable steps to identify the extent to which there are children in need within their area and carry out an assessment of their needs. It is extremely likely that a 16 or 17 year old who is homeless (such as where they are excluded from home and are, for example, staying with various friends, or sleeping in a car) will be a child in need.
- 23.9** Sections 20(1) and (3) of the 1989 Act require, in certain circumstances, local authorities to provide accommodation to a child in need within their area. See paragraphs 3.8 and 3.9 of the statutory guidance in paragraph 23.7 for further information on when this duty applies. Where a 16 or 17 year old is owed a duty under section 20, this takes precedence over the duties in the 1996 Act in providing accommodation and support for that child in need. There are two circumstances in which an authority might find that a homeless 16 or 17 year old should not be accommodated under section 20, and may instead be owed duties under the 1996 Act. These circumstances are where the young person is not a child in need, or where they are a 16 or 17 year old child in need who, having been properly and fully advised of the implications and having the capacity to reach a decision, has decided that they do not want to be accommodated under section 20.
- 23.10** Section 17(1) of the 1989 Act imposes a general duty on local authorities to safeguard and promote the welfare of children within their area who are in need and, so far as is consistent with that duty, to promote the upbringing of such children by their families. This can include the provision of accommodation, assistance in kind or in cash. The provision of accommodation under section 17(1):
- a. cannot be used as a substitute for the duty to provide accommodation under section 20 to a homeless 16 or 17 year old child in need; and,
 - b. can be used where the authority does not otherwise owe a duty to provide accommodation under the 1996 Act (for example, because they are found to be intentionally homeless). This will almost always concern children who need to be accommodated with their families or carers but, in some circumstances, could cover a homeless 16 or 17 year old child in need who does not wish to be accommodated under section 20.
- 23.11** When exercising duties under the 1989 Act or the 1996 Act, the authority should provide the young person with extra support, including access to independent advocacy to assist them in understanding and navigating the housing system, weighing up the advantages and disadvantages and coming to a balanced decision.
- 23.12** Where a young person is accommodated under section 20 of the 1989 Act for a continuous period of more than 24 hours, that child becomes looked after. The local authority will owe them the same duties as are owed to all looked after children and, once they cease to be looked after, will owe them the duties that are owed to all care leavers. See Chapter 22 for further guidance on care leavers.

Requests for homelessness support from young people

- 23.13** Under section 184 of the 1996 Act, if a housing authority has 'reason to believe' a young person may be homeless, or threatened with homelessness, they must make inquiries to determine what duties, if any, are owed to them. This is a low threshold which is likely to be triggered if it is apparent the young person is or may become homeless (for example, a report of relationship breakdown affecting their living arrangements). Formal applications are not required. Young people experiencing or threatened with homelessness may face additional obstacles that adversely impact their ability to use a particular method. Authorities should not prescribe onerous or specific methods to access homelessness support. Authorities should adopt a flexible approach and accept requests for support in a variety of manners and forms, including in person, by post, by telephone, by email or by other electronic means. See paragraph 6.2 and Chapter 18 for further guidance.

- 23.14** Under section 188 of the 1996 Act, if a housing authority has 'reason to believe' a young person may be homeless, eligible for assistance and has a priority need, they must provide them with interim accommodation. This is a low threshold and the starting point for inquiries will be the information provided by the young person. Inquiries under section 188 are separate to those being carried out under section 184 and address a different question. To ensure the authority can comply with this duty, an initial interview and preliminary assessment should be carried out as soon as reasonably possible after a request for assistance is received. See Chapter 15 for further guidance.
- 23.15** Many young people report experiencing a lack of care and respect when dealing with housing authorities and a sense that youth homelessness was not considered serious. When dealing with requests for homelessness support from young people, the Secretary of State for Housing, Communities and Local Government expects authorities to:
- a. adopt a positive and collaborative approach. This includes being sensitive to the individual's particular needs and making all reasonable efforts to cooperate with them, recognising that many homeless young people will have experienced trauma. The authority should be upfront about what kind of support they can and cannot realistically provide to the young person, and be open to considering changes in the young person's circumstances; and,
 - b. remain in regular contact, proactively provide updates, and ensure the individual understands the process. In the event of staffing changes or absences, there should be adequate staff coverage and the young person should be told who their new point of contact is.
- 23.16** Many young people report dissatisfaction with how authorities approach evidence. Authorities should be mindful of the common causes of youth homelessness and be sensitive to the potentially limited availability of evidence in these circumstances. For example, formal written evidence might not realistically be available where a young person has been kicked out of home. The authority should work with the young person to determine what is reasonable and proportionate and provide a reasonable period of time to respond.
- 23.17** Housing authorities should deal with inquiries from young people as quickly as possible whilst ensuring that they are dealt with thoroughly and sufficiently to enable the authority to satisfy itself what duties, if any, are owed or what other assistance can be offered. Inquiries should normally be completed in no less than 5, and no more than 35 working days.
- 23.18** If an issue is decided against a young person's interests, the housing authority must provide reasons. The authority should take steps to ensure the young person has received the decision in writing and understood the reasons for it. The authority should also provide information on how to challenge the decision, any relevant information the authority is required to provide under section 179 of the 1996 Act, and any advice and assistance available from voluntary sector organisations.
- 23.19** When conducting inquiries under section 184, an authority may also make inquiries to establish a young person's local connection. If this discretion is exercised, the authority should have regard to the vulnerabilities of young people, including the fact they are likely to have had less autonomy and control over the decisions on where they live and less time to form traditional bonds in an area through employment or residence. If the inquires determine that they have a local connection with the district of another authority, section 198 allows the authority to refer the case to the other authority, but only at the point of the relief duty or main housing duty. See Chapter 10 for further guidance on local connection.

The prevention and relief of youth homelessness

- 23.20** When assessing a young person's housing needs and producing a personalised housing plan under section 189A of the 1996 Act, the housing authority must consider the circumstances that caused them to become homeless or threatened with homelessness, what accommodation would be suitable for them, and what support would be necessary for them to be able to have and retain that accommodation. This assessment will be different for each young person, reflecting their specific vulnerabilities, history of trauma, and reasons for becoming homeless or being threatened with homelessness. The assessment should aim to prevent the young person's homelessness from becoming entrenched. See Chapter 11 for further guidance.

- 23.21** The 'prevention duty' under section 195 of the 1996 Act and the 'relief duty' under section 189B of the 1996 Act require a housing authority to assist a young person who is threatened with homelessness or homeless (as the case may be) irrespective of whether that young person has priority need or is intentionally homeless. See Chapters 12 and 13 for further guidance.
- 23.22** When working to prevent a young person's homelessness, the authority should take into account the specific needs, circumstances and vulnerabilities of that young person. Depending on those factors, it may (or may not) be appropriate for the young person to remain in their current home, attempt reconciliation with family or other relatives, remain in the local area, or secure alternative accommodation.
- 23.23** If a housing authority becomes aware of a young person who may become homeless, but who is not owed the prevention duty, that authority should proactively offer information, advice and assistance rather than delay providing support. This assistance should include providing the young person with the information the authority is required to make available under section 179 of the 1996 Act, and could extend to financial assistance to cover rent or other costs. Providing such information, advice and assistance at an early stage may have the best chance of preventing homelessness.
- 23.24** Where a homeless young person is eligible for assistance and has a priority need, the authority may owe them a housing duty under the 1996 Act. See Chapter 15 for further guidance. There are a range of circumstances in which a homeless young person may have priority need. See Chapter 8 for further guidance, specifically paragraph 8.42 on young people. A young person may have priority need, for example:
- a. if they are homeless as a result of domestic abuse. Domestic abuse can be perpetrated by a partner, ex-partner or by family members (such as parents, step-parents or other relatives) and can take a variety of different forms. Authorities should take all disclosures of domestic abuse seriously, but particular attention should be given to disclosures involving domestic abuse from family members, as young people will be particularly vulnerable in such circumstances. See Chapter 21 for further guidance; or,
 - b. as a result of their vulnerability. When assessing a young person's vulnerability, authorities should determine whether, if homeless, they would be significantly more vulnerable than an ordinary person would be if they became homeless. Attention should be given to situations where a young person has been made homeless because of a relationship breakdown affecting their living arrangements or domestic abuse. In such circumstances, the young person is very likely to be significantly more vulnerable than an ordinary person would be if they became homeless. See paragraphs 8.14 to 8.19 and Chapter 8 for further guidance.
- 23.25** Section 191 of the 1996 Act sets out the circumstances in which a person will be deemed to have become intentionally homeless. See Chapter 9 for further guidance. Situations where a young person has become homeless intentionally will be rare. When conducting an assessment, housing authorities should note that:
- a. it is not for the young person to 'prove their case' as to why they have not become homeless intentionally;
 - b. any assessment should take into account all the relevant facts, including the young person's emotional and mental wellbeing, maturity, and general ability to understand the impact and consequences of their actions; and,
 - c. young people are more likely to inadvertently make decisions that lead to the loss of their accommodation. Generally, authorities should not consider the acts or omissions of a young person that lead to homelessness to be deliberate where they are vulnerable or have experienced instability (for example, homelessness following a relationship breakdown affecting their living arrangements or domestic abuse).
- 23.26** If a housing authority requests evidence to determine whether a young person has a priority need, or is intentionally homeless, a flexible and cooperative approach should be taken. Authorities should consider what factors might impact a young person's ability to provide evidence, such as if they are fleeing a dangerous home environment, abusive relationships, or a situation where they have been unable to address their support needs. Where such circumstances exist, authorities should work with the young person to determine what evidence is reasonable and proportionate.

The provision of suitable accommodation

- 23.27** Where an accommodation duty applies, housing authorities should conduct an assessment to determine what accommodation is suitable to be offered to the young person. See [Chapters 15 to 17](#) and the statutory guidance referred to at paragraph 23.7 for further guidance.
- 23.28** A young person's accommodation options should be based on an individual assessment of their preferences, needs, circumstances and the local provision available. Options might include supported lodgings, supported accommodation or independent accommodation with visiting support. For young people:
- a. aged 16 or 17, supported lodgings or accommodation must be registered with Ofsted. Bed and breakfast accommodation, including hotels and nightly let accommodation with shared facilities, will never be suitable; and,
 - b. aged 18 or older, authorities should not apply a blanket presumption that the young person is ready for their own tenancy. Bed and breakfast accommodation, including hotels and nightly let accommodation with shared facilities, should only be used in exceptional circumstances for a short period of time, such as where emergency accommodation is required.
- 23.29** The location of the accommodation will always be a relevant factor in the assessment of suitability, but even more so for young people. Housing authorities should take into account that:
- a. there is a high percentage of young people who are not in education, employment or training. If the young person is not in education, employment or training, the authority should consider whether the location of the accommodation would assist or hinder the young person from pursuing education, employment or training. Where a young person is in education, employment or training, the authority should consider whether the location of the accommodation would assist or hinder the young person from reaching their normal place of study, work or training; and,
 - b. while young people should generally be provided with accommodation close to where they were previously living, their preference should be taken into account and, depending on the circumstances (such as any relationship breakdown affecting their living arrangements or domestic abuse) it may not be appropriate for the young person to remain in the area.
- 23.30** Housing authorities must take into account whether the accommodation is affordable to the young person. Authorities should have regard to the fact that young people may be completing apprenticeships or other training programs, are generally likely to have a lower level of savings due to being at an early stage of their employed life. Young people are also often entitled to lower wages and benefits than older adults, for example, the entitlement to lower minimum rates of pay, the lower rate of Universal Credit, and only the shared accommodation rate of Local Housing Allowance.
- 23.31** As a consequence of affordability restraints, young people are more likely to have to live in shared accommodation which may not be suitable for their needs. Young people have reported feeling unsafe, vulnerable or isolated when placed in shared accommodation (for example, when placed with individuals of a different gender or being placed with individuals who are much older than them). Housing authorities should ensure, as part of the suitability assessment, that the accommodation options for the young person are both gender-appropriate and age-appropriate.

FURTHER RECOMMENDATIONS

This final section outlines several future recommendations that could not be incorporated into the proposed chapter at this stage, as they are not yet reflected in legislation. We are convinced that adopting these recommendations would strengthen policy frameworks supporting homeless young people and improve their access to sustainable, long-term accommodation. Consequently, these recommendations will guide future policy and campaigning efforts, with the aim of securing their inclusion in the chapter once they are reflected in legislation.

- The Government should provide **sufficient funding** to local authorities in England to ensure that all young people who report to homelessness support services receive an assessment and support if required.
 - The Government should undertake a **formal review into youth homelessness assessment rates** by councils in England.
 - The Ministry of Housing Community and Local Government should **increase oversight and monitoring** of local authority implementation and practices related to the implementation of the HRA when tackling youth homelessness.
 - The Government should introduce an amendment to the Housing Act 1996 to **prevent young people from being disadvantaged in establishing local connection** by including additional grounds, such as location of education, when assessing eligibility.
 - The Government should introduce **greater leniency for under-25s in intentional homelessness decisions** to reflect their distinct vulnerabilities and experiences that may have contributed to their homelessness. From a prevention perspective, accommodating young people before their situation becomes entrenched is both more effective and cost-effective.
 - Local authorities should implement a **‘trusted partner verification’** system for young people who lack sufficient evidence to prove their eligibility.
- This would allow third sector organisations to provide verification of a young person’s homelessness status directly to the authority.
- Local authority advocacy contracts should include a proactive (opt-out) offer of **advocacy for homeless 16/17-year-olds**. The offer should be made when the 16/17-year-old first gets in contact for homelessness support, as well as during the Child in Need assessment.
 - The Government should increase investment in **youth specific supported accommodation** to ensure that homeless young people are able to access accommodation that meets their needs.
 - The Government should **abolish the Shared Accommodation Rate (SAR)**, enabling those eligible for housing support under Universal Credit to better afford a one-bedroom private rental property.
 - The Government should **introduce a new Youth Independence Payment** of £83.16 (£86.32 from April 2026) for homeless young people and care leavers. This would raise their overall UC entitlement to the rate that over 25s receive in recognition that they face the same living costs. This would help to reduce financial barriers and help young people to be able to manage their tenancies.

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