

Just for Kids Law submission to the Education Select Committee's inquiry on children's homes

"16- and 17-year-olds who are placed in unregulated accommodation without being placed in care"

April 2021

Key messages

- > The use of unregulated provision for 16- and 17-year-olds is increasing, despite the many instances of poor-quality provision seen in Just for Kids Law's caseload.
- > The vast majority of 16- and 17-year-olds who are homeless or at risk of homelessness and approach local authorities for help should be accommodated as a looked-after child under section 20 of the Children Act.
- > But our research based on FOIs in 2018-19 found that an estimated 1,498 16- and 17-year-olds housed in unregulated accommodation (1 in 5 of all children living in unregulated settings) were not made a looked-after child by the local authority they approached.
- > Not being housed as a looked-after child has a long-lasting impact on these children– they do not receive support from a social worker and miss out on the care leavers entitlements they would receive between the ages of 18 and 25. In many unregulated placements, they would also not receive much or any support from the on-site team and would legally be unable to receive care, despite still being a child.
- > These children are being left behind as the Government's planned reforms – to ban children in care who are under 16 from being placed in unregulated settings and to create national minimum standards for unregulated placements accommodating 16- and 17-year-old looked-after children – do not include them in their scope and may even lead to worse outcomes for them.

Why we are submitting evidence

The current discussions around the use and appropriateness of unregulated accommodation do not take the full picture into account. The Government's planned reforms will not include the estimated 1,500 vulnerable children a year – the one child in five living in unregulated accommodation without being a looked-after child – in their scope. No further work is currently planned by DfE to address this issue despite Just for Kids Law raising the issue repeatedly.

As we begin our recovery from the Covid-19 pandemic, all children must be placed at the centre of policy making. It is more important than ever that no child is left behind.

More children housed in poor-quality unregulated accommodation

1. The number of children aged 16 or 17 living in unregulated accommodation has close to doubled in the last ten years, to over 6,000.¹
2. Children and young people housed in unregulated accommodation make up a significant proportion of Just for Kids Law (JfKL) youth advocacy and legal casework. Although we recognise there is a wide spectrum of quality and suitability of unregulated settings, we see too many cases where the quality of support and accommodation is not up to par. Children have told our front-line practitioners about their experiences of being housed in dirty, unheated accommodation which are in a state of disrepair or lack basic fittings or furniture, or living in unsafe accommodation alongside adults where they are exposed to drinking, drug taking and sexual harassment. Some placements see high staff turnover which makes it difficult for children to build relationships with staff members. Others have strict rules around having visitors which prevent children being able to socialise with friends. This all negatively impacts on their education and physical and mental health.

Large numbers of 16- and 17-year-olds housed in unregulated accommodation without being placed in care

3. We are concerned that local authorities have continued to accommodate large numbers of homeless 16- and 17-year-olds in unregulated accommodation without making them looked-after children, leaving them with little to no support.
4. Most 16- and 17-year-olds who become at risk of homelessness and approach their local authority for support should be accommodated by children's services under section 20 of the Children Act 1989, which states that local authorities have a duty to accommodate children under 18 who are unable to live with their families. Although housing services also hold a duty to homeless 16- and 17-year-olds, as under Part VII of the Housing Act 1996 they have priority need, under the well-known Southwark judgment of 2009² local authorities' duties under the Children Act takes precedence over their duties under the Housing Act. This was reiterated in joint statutory guidance³ published in 2010 by the Ministry of Housing, Communities and Local Government (MHCLG) and the Department for Education (DfE) and updated in 2018 to reflect new duties introduced by the Homelessness Reduction Act 2017.
5. Being accommodated under section 20 means that the child becomes a looked-after child after 24 hours and is then entitled to a social worker and ongoing support from their local authority. A child in care will become a care leaver upon turning 18 and will be eligible for pathway planning (long-term assessment of their support needs) and support with their education, career planning, employment, accommodation, financial needs and any other support needs up to age 25. They will also have priority need under homelessness legislation, which means they will be more likely to be supported into long-term housing by their local authority should they become homeless after they turn 18.

¹ Department for Education (2020) *Looked after children in independent or semi-independent placements*
<https://www.gov.uk/government/publications/looked-after-children-in-independent-or-semi-independent-placements>

² R (G) v Southwark [2009] UKHL 26

³ Ministry of Housing, Communities and Local Government and Department for Education (2010) *Prevention of homelessness and provision of accommodation for 16 and 17 year old young people who may be homeless and/or require accommodation*
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/712467/Provision_of_accommodation_for_16_and_17_year_olds_who_may_be_homeless.pdf

6. Although this path should be the norm for the vast majority of children who become homeless when they are 16 and 17, unfortunately for many years now JfKL's youth advocacy and legal teams have regularly encountered cases of 16- and 17-year-olds who are facing homelessness and do not receive the support they are entitled to from their local authority children's services. In many cases, these children were unlawfully accommodated under the Housing Act instead of section 20 of the Children Act 1989, as should be the case. In some cases, they were housed under section 17 of the Children Act 1989, a provision normally applied to families and not intended to be used for children on their own.

7. Children who are accommodated under the Housing Act or under section 17 of the Children Act are entitled to much less support and do not have any entitlements once they turn 18, including not having priority need. In particular, a child accommodated under the Housing Act is not legally entitled to a social worker or any form of support from the local authority while they are still a child. In this context, a 17-year-old placed in unregulated accommodation without being made a looked-after child can be left to fend for themselves entirely, without even staff making sure their needs are being met.

A 17-year-old placed in unregulated accommodation and left without any support

Jack* was 19 years old when he approached JfKL. He has mental health difficulties, had been known to children's services since he was very young and had a very difficult relationship with his parents. When Jack turned 17, he was asked to leave the family home forever. He approached the local authority's housing department (unaware of the difference between children's services and housing services) and was accommodated under the Housing Act in an unregulated placement and provided with a £25 food voucher. He was never referred to children's services, despite the fact he was a child at the time and was not provided with any other support. He had no choice but to start working, despite the impact on his benefits, which he struggled to manage, resulting in him accruing rent arrears.

Jack was at risk of eviction when he approached JfKL for help. JfKL argued that in failing to assess his needs under the Children's Act 1989 and to provide him with accommodation under section 20, the local authority acted unlawfully and that it should now treat him as if he were a Former Relevant Child (a care leaver), and provide him with leaving care services to assist his transition into young adulthood. This challenge was successful and he is now being provided with leaving care services and most of his rent arrears have been cleared.

*not his real name

8. This is one of the most common issues we see in our practice. As JfKL's casework is London-focused, we undertook research in 2020 to ascertain the scale of the issue nationally. Freedom of Information (FOI) requests were sent in spring 2020 to all local authorities in England, asking how many 16- and 17-year-olds they had housed without making them looked-after children. We received replies from just over a third of local authorities contacted. Based on these replies, we estimated that over one year more than 2,500 16- and 17-year-olds are being housed by their local authority without legally being in care.⁴

⁴ Full details can be found in our report: Just for Kids Law (2020) *Not in Care, Not Counted* <https://justforkidslaw.org/sites/default/files/fields/download/Just%20for%20Kids%20Law%20-%20Not%20in%20care%2C%20not%20counted%20-%20June%202020.pdf>

9. Of 134 local authorities (39% of all local authorities contacted) who responded with full or partial information, the data provided shows that between 1st April 2018 – 31st March 2019, the total number of 16- and 17-year-olds who were accommodated but not made looked after children was 1,010 (592 under section 17 of the Children Act and 418 under Part VII of the Housing Act). If this trend is consistent across all 343 local authorities in England, this would mean that in 2018-2019, local authorities would have accommodated 2,585 16- and 17-year-olds without making them looked-after children. It is important to recognise that this figure obviously does not include children who are ‘gatekept’ – sent away without being accommodated – which JfKL’s experience suggests is likely to be a significant number of children.

Table 1 – Estimated number of children accommodated by local authorities without being made a looked-after child

	1 st April 2018 – 31 March 2019	1 st April 2017 – 31 March 2018
Section 17	592	564
Part VII of Housing Act	418	401
Total non-LAC 16- and 17-year-olds	1,010	965
Projection across all LAs	2,585	2,470

10. We asked local authorities for the same data for the previous year in order to compare and found that an estimated 2,470 16- and 17-year-olds were accommodated without being put in care in 2017-18. This illustrates that the situation is not improving year-on-year. A report by The Children’s Society published in 2015⁵ estimated the number of such children that year to be 1,800, showing that the situation is in fact worsening.

11. This is in parallel with an increased number of children entering care at a later age,⁶ often due to a breakdown in their family situation. Cuts made to children’s social care in the past decade – an estimated £2.2 billion cut to children’s services since 2010 – have led to local authority spending on early intervention services for children and young people to fall from £3.5 billion to £1.9 billion between 2010/11 and 2018/19⁷ and to social services now only getting involved at crisis point. It is likely that this has led to an increase in the overall number of children made homeless by a breakdown in family relationships. With children’s services severely underfunded, more of these children will be nudged towards being accommodated under the Housing Act or section 17 of the Children Act as it is a cheaper option for local authorities than providing all of the support a looked-after child is entitled to.

⁵ Pona, I., and Crellin, R. (2015) *Getting the house in order: Keeping homeless older teenagers safe* The Children's Society https://www.basw.co.uk/system/files/resources/basw_12322-2_1.pdf

⁶ Between 2015 and 2019, the proportion of children in care aged 10 to 15 increased by 18% and for those aged 16 and over by 21%: Department for Education (2019) *Children looked after in England including adoption: 2018 to 2019* <https://www.gov.uk/government/statistics/children-looked-after-in-england-including-adoption-2018-to-2019>

⁷ Action for Children, National Children’s Bureau, NSPCC, The Children’s Society, and Barnardo’s (2020) *Children and young people’s services: Funding and spending 2010/11 to 2018/19* https://media.actionforchildren.org.uk/documents/Joint_report_-_childrens_services_funding_2018-19_May_2020_Final.pdf

12. We also asked local authorities how many of these children who were accommodated without being put into care were placed in unregulated accommodation. The responses in the table below show that over half of these children (nearly 58% of them in 2018-19) were placed in unregulated accommodation, where they would often be finding themselves without very little support from on-site staff.

Table 2 – Estimated number of children accommodated in unregulated accommodation without being made a looked-after child

	At 31 March 2019	At 31 March 2018
<i>16- and 17-year-olds housed in unregulated accommodation under:</i>		
Section 17	357	328
Part VII of Housing Act	228	220
Total	585	548
Projection across all LAs	1,498	1,402

Most children not able to make an informed choice not to go into care and failed by their local authority

13. Though some of these children will have made a fully informed decision not to enter care, many others would not have been given the option or fully informed of the consequences of their choice. There is an exception in the joint statutory guidance which allows local authorities to house 16- and 17-year-old under the Housing Act or under section 17 of the Children Act instead of as a looked-after child, but this must be what the child decides after being fully informed of their options and their consequences.⁸

14. In our experience, this is often not the case with some local authorities pushing children towards the Housing Act as this is significantly cheaper than having to provide all the support a looked-after child is entitled to. Under the joint guidance, children in this situation should have access to independent advocacy to help them understand their rights and make a fully informed decision,⁹ but there is no clear duty on the local authority to actively support this.

A 17-year-old who did not receive the support she was entitled to despite making her wishes clear

Jessica* approached JfKL for support when she was 17 years old as she was street homeless that night. The relationship with her parents had broken down when they were physically and verbally abusive towards her, resulting in her obtaining a non-molestation order against them. She had been sofa surfing with another family but this had also broken down.

She approached children's services with the support of an advocate and was informed that the local authority would go through its usual process and could not provide accommodation for her pending

⁸ Paras. 3.48 and 3.49, Ministry of Housing, Communities and Local Government and Department for Education (2010) *Prevention of homelessness and provision of accommodation for 16 and 17 year old young people who may be homeless and/or require accommodation*

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/712467/Provision_of_accommodation_for_16_and_17_year_olds_who_may_be_homeless.pdf

⁹ Paras. 3.46 and 3.47, *Ibid*

its assessment. This is contrary to the statutory guidance. When she found herself locked out of her friend's home, she contacted the out of hours service stating she was street homeless and was told to wait for a call back which never happened. As a result, Jessica ended up staying in a police station until the early hours of the next morning. The following night, JfKL obtained emergency funding to place Jessica in accommodation for one night.

Following pre-action correspondence, the local authority provided the Jessica with interim accommodation pending an assessment of her needs. No clarity was provided as to whether this was under section 20 of the Children Act or another provision, nor what she was to do once the temporary accommodation expired, despite the fact the local authority was aware that she would be street homeless. No indication was made that during this time the local authority was assessing her needs, contrary to the statutory guidance. Jessica had made her wishes and feelings clear and expressed she wanted to be accommodated under section 20. Following pre-action correspondence, the local authority finally agreed to accommodate her under section 20 as a looked-after child.

*Not her real name

15. In 78% of the cases taken on by JfKL's legal team where local authorities had previously unlawfully refused to house these children as looked-after children, local authorities quickly conceded. In the majority of these cases (76%), they conceded following only a pre-action letter or letter from our legal team.¹⁰

16. Our legal team also frequently represents young adults who similarly were not accommodated as looked-after children when they were under 18 and then were not entitled to any further support from their local authority once they turned 18, as illustrated by the case study below. Such cases are informally called 'retrospective cases'. In 2018-19, 75% of these cases were successful, with the young people retrospectively treated as Former Relevant Children (care leavers) by the local authorities which had failed them as children, with all of the legal entitlements this comes with.

A vulnerable young person who did not receive the support she was entitled to when she was under 18

Megan* became homeless when her mother passed away and her relationship with her stepfather broke down irrevocably. Her biological father had been abusive towards her and her mother, and she was not in contact with him. She approached the local authority's children's services department aged 16 on multiple occasions and was told there was no accommodation available for her. During this period, she was forced to spend the night in places that were open for 24 hours, such as McDonalds' restaurants, casinos and hotel receptions. Eventually she was placed in an unregulated placement. However, she was asked to leave after only two weeks because she let a friend of hers, a child, spend the night at the accommodation, which was a breach of the rules.

She then became homeless and sofa surfed again before being housed again in a hostel and eventually in another unregulated placement where she stayed for six months. The only form of support she received throughout this period was in the form of food vouchers and, as a result of her financial difficulties, she became involved in criminal activities. At no point was an assessment of her needs made, or the difference between being accommodated by children's services or by housing services explained to her.

¹⁰ Just for Kids Law (2020) *Not in Care, Not Counted*
<https://justforkidslaw.org/sites/default/files/fields/download/Just%20for%20Kids%20Law%20-%20Not%20in%20care%2C%20not%20counted%20-%20June%202020.pdf>

When Megan was 18, she was told her case was going to be closed despite her still wanting and needing ongoing support. She was evicted from her accommodation and became homeless again. JfKL argued that Megan was a child when she first approached the local authority and should have had her needs assessed and been accommodated under section 20 and that the local authority should now provide with her leaving care support as a Former Relevant Child (a care leaver). The local authority initially refused to do this, arguing that Megan never accepted formally to be looked after by the local authority. JfKL threatened judicial review proceedings and prior to issuing proceedings, the local authority agreed to treat Megan as a Former Relevant Child and provide her with support as a care leaver (without admitting fault).

*not her real name

17. Such a high success rate, coupled with the fact most cases are settled as soon as solicitors become involved, illustrates that many of these decisions do not have a basis in law. In fact, these cases arise because of local authorities so called 'gatekeeping' – or limiting access to – resources, stretched local authority funding and arbitrary decision-making, rather than correct application of the joint statutory guidance on homeless 16- and 17-year-olds.¹¹ Undoubtedly many more children who are not aware of their rights, and do not get in touch with services such as ours, fall through the net without ever realising.

18. In our experience, whether children will receive the support they are entitled is often the result of a postcode lottery. Youth homelessness at this age is often the result of a breakdown in family relationship¹² and there is often little difference in the child's circumstances. Although what path they take (what legislation they are housed under) will have major long-term circumstances on their lives, it can come down to whether they present to their mother's or their father's local authority, or even which staff member they first talked to.

19. We have seen some anecdotal evidence that, due to the additional resource burdens imposed by Covid-19, some local authorities may be seeking to house more homeless 16- and 17-year-olds under Part VII of the Housing Act rather than section 20 of the Children Act, as this represents a cheaper option for them as they would not be owed any duties as a care leaver.

Government's plans to reform unregulated provision not addressing the issue

20. As detailed above, each year, local authorities accommodate over 2,500 homeless 16- and 17-year-olds without making them looked-after children. This has extensive long-term implications on the support they will receive for years after. Near 1,500 of those children are estimated to be housed in unregulated accommodation.¹³ As just over 6,000 looked-after children live in unregulated settings,¹⁴ this means that one in five children living in unregulated accommodation is not in care.

¹¹ Ministry of Housing, Communities and Local Government and Department for Education (2010) *Prevention of homelessness and provision of accommodation for 16 and 17 year old young people who may be homeless and/or require accommodation*

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/712467/Provision_of_accommodation_for_16_and_17_year_olds_who_may_be_homeless.pdf

¹² Pona, I., and Crellin, R. (2015) *Getting the house in order: Keeping homeless older teenagers safe* The Children's Society https://www.basw.co.uk/system/files/resources/basw_12322-2_1.pdf

¹³ Just for Kids Law (2020) *Not in Care, Not Counted* <https://justforkidslaw.org/sites/default/files/fields/download/Just%20for%20Kids%20Law%20-%20Not%20in%20care%2C%20not%20counted%20-%20June%202020.pdf>

¹⁴ Department for Education (2020) *Looked after children in independent or semi-independent placements* <https://www.gov.uk/government/publications/looked-after-children-in-independent-or-semi-independent-placements>

21. Following concerns raised by media programmes and widely shared cases, in 2020 DfE opened a consultation on the use of unregulated provision for children in care and care leavers. While such an examination of unregulated provision was much needed, the scope of the consultation and the resulting reforms do not address the issue laid out in this submission,¹⁵ despite Just for Kids Law raising this with both DfE and MHCLG repeatedly and sharing evidence from our report.¹⁶ The consultation was based on DfE commissioned research which had examined the use of unregulated provision for children in care solely.¹⁷ The restricted scope of the commissioned research and ensuing consultation and announced reforms was what prompted JfKL to conduct this piece of research in order to establish the true scale of the issue.

22. Predictably, the one child in five living in unregulated accommodation without being in care is now facing being left behind by the Government's planned reforms to ban children in care who are under 16 from being placed in unregulated settings and to create national minimum standards for unregulated placements accommodating 16- and 17-year-old looked-after children. These reforms do not include those children in their scope as they will only apply to children in care. No further work on this issue is currently planned by DfE which holds a responsibility to these children because not only, are they children, but they are children who should be in care.

23. It is disappointing that the findings of our research have so far not been taken on board by the Government to inform the reforms to unregulated provision. The document setting out the Government's plan is silent on how it will impact children living in unregulated settings who are not in care.¹⁸ In the worst-case scenario, the planned reforms may make things even graver for these children. For example, children who are not looked after could be forced out of semi-independent placements (where they can at least receive some support) into even more basic forms of accommodation, such as temporary accommodation, by local authorities to ensure they can meet their duties in relation to 16- and 17-year-olds in care. Another risk is that if an increase in regulation brings additional costs for local authorities which aren't covered by national Government, some may try to push more children down the Housing Act or section 17 route as this is a much cheaper option for them.

24. There is also an additional serious concern with the planned reforms, in that the ban on placing looked-after children who are under 16 in unregulated accommodation will create a two-tier care system where children under 16 will be guaranteed care, and those aged 16 and 17 will not, despite 16- and 17-year-olds still being children. Looked-after children aged 16 and 17 will still be able to be placed in independent and semi-independent accommodation (currently also referred to as

¹⁵ Department for Education (2021) *Reforms to unregulated provision for children in care and care leavers: Government consultation response*

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962686/Unregulated_government_response_Final.pdf

¹⁶ Just for Kids Law (2020) *Not in Care, Not Counted*

<https://justforkidslaw.org/sites/default/files/fields/download/Just%20for%20Kids%20Law%20-%20Not%20in%20care%2C%20not%20counted%20-%20June%202020.pdf>

¹⁷ Prof. Greatbatch, D., Tate, S. (2020) *Use of unregulated and unregistered provision for children in care* Department for Education

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/865184/Use_of_unregulated_and_unregistered_provision_for_children_in_care.pdf

¹⁸ Department for Education (2021) *Reforms to unregulated provision for children in care and care leavers: Government consultation response*

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962686/Unregulated_government_response_Final.pdf

unregulated accommodation) but regulated by proposed minimum standards, which the Government is due to consult on in 2021.

25. However, these minimum standards will deliberately omit care, as any setting which provides care to children must under the law register as a children's home. Although we understand that some older looked-after children would thrive in an environment which enables them to progressively grow towards independent living, the decision to forbid such settings to provide care to children is illogical. We call for all settings housing children under 18 to provide care to these children and as part of the Steering group of the Keep Caring until 18 campaign¹⁹ fully endorse the submission sent into this inquiry by the campaign.

26. Recommendations

- The Government should amend the joint MHCLG/DfE statutory guidance on *Prevention of homelessness and provision of accommodation for 16 and 17 year old young people who may be homeless and/or require accommodation* to clarify that as a default position, all homeless children (under 18) should receive support as a looked-after child (under section 20 of the Children Act) unless they have explicitly said they do not want to after being made fully aware of their rights and entitlements.
- Homeless 16- and 17-year-olds should always have access to an independent advocate to support them to make decisions about the type of support they receive from the local authority. The Government should write to all Directors of Children's Services to ensure that they are aware of their responsibilities in the joint MHCLG/DfE statutory guidance to provide independent advocacy to children in this situation.
- The Government should urgently take steps to ensure that all local authorities are aware that children are expected to be housed under section 20 in almost all circumstances and that use of section 17, the Housing Act or other arrangements should not be routine practice in local authorities' response to homeless 16- and 17-year-olds. These steps should include:
 - A letter from the Secretary of State to remind local authorities of their legal duties.
 - A duty to report to the Director of Children's Services every time a child is accommodated without becoming looked after.
 - Delivery of training to local authority homelessness and children's services departments on their duties to 16- and 17-year-olds who are homeless.
- Following the Care Review, the Government should consider amending legislation and the joint MHCLG/DfE statutory guidance to create a new status of 'vulnerable 16- or 17-year-old' for homeless under 18s who are assessed as children in need (section 17) and who refuse to become accommodated under section 20, which would allow greater flexibility of responses but ensure the same level of entitlements and support as 'looked after' status. Vulnerable 16- or 17-year-olds should have a pathway plan drawn up and receive at a minimum the same entitlements as qualifying care leavers once they turn 18. The joint statutory guidance should also be amended to stipulate that where a vulnerable child is assessed to be a child in need, but refuses to become looked after, they are allowed to change their mind if the solution they chose does not work for them or if risks escalate and they need to be supported without any further delay.
- Local authorities should regularly gather and publish data on the numbers of children accommodated under section 17 of the Children Act, Part VII of the Housing Act or other

¹⁹ For more information on the campaign, visit <https://article39.org.uk/keepcaringforchildrento18/>.

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arrangements and in what type of accommodation these children are placed. This should be monitored by DfE and Ofsted.

- The Government should ensure that local authorities have sufficient resources to allow them to fulfil their statutory duties to children who should be looked after under section 20 and to provide them with access to independent advocacy.
- The Government should amend the *Homelessness code of guidance for local authorities*²⁰ to include a duty for local authorities to assess whether a young person who is aged 18 to 24 and presenting as homeless should have been made a looked-after child when they were under 18 and thus should have care leaver entitlements, including priority need under homelessness legislation.
- The Government should ban the placement of all children (under 18) in unregulated accommodation where they will not receive care. Failing that, the Government should ensure that the planned minimum standards for independent and semi-independent (unregulated) provision extend to all children living in such settings, regardless of which piece of legislation they are being housed under, and not just to looked-after children.

About Just for Kids Law and the Children's Rights Alliance for England

Just for Kids Law (JfKL) works with, and for, children and young people to hold those with power to account, and to fight for wider reform by providing legal representation and advice, direct advocacy and support, and campaigning to ensure children and young people in the UK have their legal rights and entitlements respected and promoted and their voices heard and valued.

The lack of secure and suitable housing for homeless children, families and young people across England is part of our casework and campaigning. We work with children and young people to campaign for their right to have safe and secure housing, to ensure they get the housing support they need from local authorities, to challenge decisions which deny children and young people their statutory entitlements to housing support and to find housing which is safe and suitable.

The Children's Rights Alliance for England (CRAE) merged into Just for Kids law in 2015 and works with over 100 members to promote children's rights and monitor government implementation of the UN Convention on the Rights of the Child.

We believe that human rights are a powerful tool in making life better for children. We fight for children's rights by listening to what they say, carrying out research to understand what children are going through and using the law to challenge those who violate children's rights. We campaign for the people in power to change things for children. And we empower children and those who care about children to push for the changes that they want to see.

Contact details

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²⁰ Ministry of Housing, Communities and Local Government (2018) *Homelessness Code of Guidance for Local Authorities* https://assets.publishing.service.gov.uk/media/5ef9d8613a6f4023cf12fc67/Current_Homelessness_Code_of_Guidance.pdf