

3

State of Children's Rights in England 2018

Poverty and
Homelessness



Briefing 3

Poverty and Homelessness

ARTICLE 26 Children have a right to benefit from social security, taking into account the resources and circumstance of those who have responsibility for the child.

ARTICLE 27 Every child has a right to a standard of living adequate to their physical, mental and social development. States Parties shall take appropriate measures to assist parents and carers, and shall in case of need provide assistance and support with particular regard to food, clothing and housing.

ARTICLE 18.2 States Parties shall give appropriate assistance to parents and legal guardians in the performance of their child-rearing responsibilities and shall ensure the development of institutions, facilities and services for the care of children.

Definitions and glossary

Children: All children and young people under 18 as set out by article 1 of the UN Convention on the Rights of the Child (CRC).

No recourse to public funds (NRPF): Anyone with this condition cannot access mainstream benefits or in some cases the labour market. This is either because they are undocumented and have an unresolved immigration status or they have a legal right to remain in this country but have an attached NRPF condition on their leave to remain.

Section 17: Section 17 of the Children Act 1989, which provides a general duty on local authorities to safeguard and promote the welfare of all "children in need" in their local area.

Undocumented: Individuals whose immigration status is unresolved and as a result they do not have permission to enter or remain in the UK.

Relative poverty: Household living with income below 60% of the median income in that year.

About this briefing

The UK ratified the UN Convention on the Rights of the Child (CRC) in 1991. This means that all areas of government and the state including local government, schools, health services and criminal justice bodies must do all they can to fulfil children's rights.

This briefing is part of CRAE's *State of children's rights in England 2018* report, and assesses the progress made in England towards implementing the UN Committee's recommendations on child poverty and homelessness, which are part of a child's right to an adequate standard of living. It highlights areas of progress and concern since CRAE's last *State of Children's Rights in England* report published in December 2017. It is based on written and oral evidence from CRAE's members and additional analysis of recent laws and policies, newly published research, official statistics and responses to Freedom of Information (FOI) requests.

What is the CRC?

The CRC applies to all children aged 17 years and under, and sets out the basic things that children need to thrive: the right to an adequate standard of living, to be protected from all forms of violence, to an education, to play, be healthy, and be cared for. Children's rights should act as a safety net, meaning children always receive at least the minimum standard of treatment whatever the changing economic climate.

The CRC has four guiding principles (General Principles) which are rights in themselves, but also the framework through which all the rights in the CRC should be interpreted. They are: non-discrimination (article 2), the best interests of the child (article 3), survival and development (article 6) and respect for the views of the child (article 12). England's compliance with these General Principles is covered in Briefing 2.

Key to UPR recommendations:

 Supported  Noted

Concerns of the United Nations

In June 2016 the UK government was examined by the **UN Committee on the Rights of the Child** (the UN Committee) on its compliance with the CRC for the first time since 2008. The UN Committee made a number of recommendations (Concluding Observations) for change.¹ In May 2017 the UK was examined on all its human rights treaties, including the CRC, by the 193 member states of the Human Rights Council as part of the **Universal Periodic Review (UPR)**.² This is a process where states can reiterate previous recommendations made by UN Committees and can be used by civil society and parliamentarians as an additional advocacy tool. The government can choose whether to "support" (accept) recommendations or "note" them (reject or not agree). We are very disappointed that the government has only supported 28% of the recommendations relating to children's rights, compared to 42% of all the recommendations it received. Below are the relevant UN Committee and UPR recommendations for this briefing:

- Re-establish concrete targets to eradicate child poverty, and continue regular monitoring and reporting on child poverty reduction 
- Ensure clear focus on the child in the State Party's poverty reduction strategies and action plans, including in the new Life Chances Strategy  
- Conduct a comprehensive assessment of the cumulative impact on children of the social security and tax credit reforms introduced between 2010 and 2016  
- Where necessary, revise the mentioned reforms in order to fully respect the right of the child, and to have his or her best interests taken as a primary consideration 
- Monitor and assess effectiveness of policies and programmes on food security 
- Conduct a rigorous child rights impact assessment of the recent reduction in funding for childcare and family support,

and make childcare services available to all who need it **CRC**

- Strictly implement the legal prohibition of prolonged placement of children in temporary accommodation **CRC**
- Take necessary measures to reduce homelessness and to progressively guarantee all children stable access to adequate housing **CRC**

Introduction

Increases in child poverty have had a devastating impact on the realisation of children's rights.

Despite recommendations by the UN Committee in 2016 on child poverty in the UK,³ the government has continued to implement policies that contribute to rising levels of poverty, insecurity and homelessness for the most disadvantaged families, leading to an erosion and regression of children's rights.

There is still no action plan to tackle child poverty and no progress on developing targets to reduce it. Instead, welfare reforms including the 'benefit cap', the roll-out of Universal Credit (UC) and the freeze on social security benefits have had a particularly negative impact on those already struggling, including low-income families with children, single-parent families and those with disabilities.⁴ Projections by the Institute for Fiscal Studies⁵ and the Equality and Human Rights Commission (EHRC)⁶ point to an even greater rise in child poverty if current trends continue.

Local authorities are still failing to provide safe and secure housing for many vulnerable children and families. Many are still often housed in temporary and unsafe accommodation, beyond the maximum legal limit.

What progress have we made?

The Secretary of State's indication of a measured approach to rolling out UC is welcome.⁷ This follows evidence that it has led to hardship for many.⁸

The Homeless Reduction Act (HRA) 2018 has introduced a legal duty on councils to give meaningful support to those trying to resolve their homelessness and has introduced measures to prevent people becoming homeless. This is welcome. However, given ongoing funding and housing shortages, there are many concerns that local authorities will not have the means to be able to meet their duties.

Where do we need to improve?

Child poverty

Rising levels of child poverty

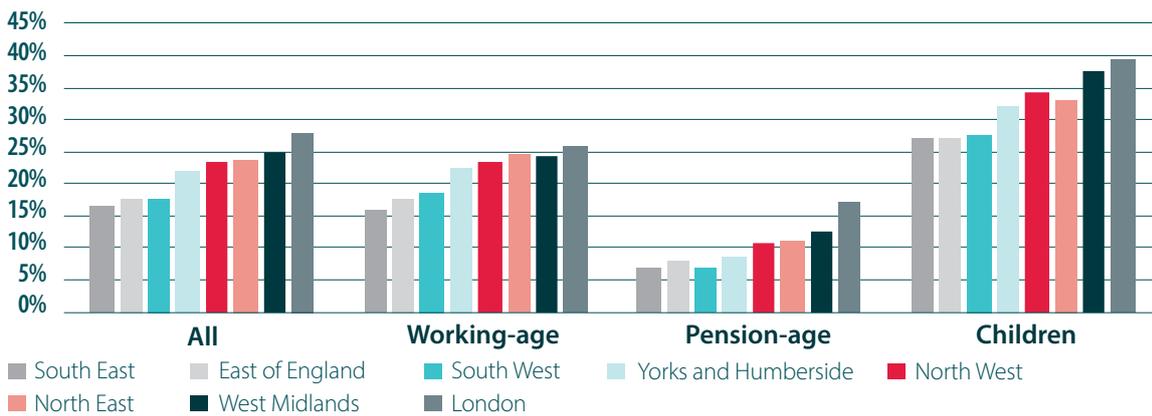
It is alarming that the latest child poverty figures show the number of children living in relative poverty in the UK (after housing costs) increased to 4.1 million in 2016-17.⁹

Despite the government's insistence that work is the best route out of poverty,¹⁰ statistics show that in 2016-17 two-thirds (67%) of children in poverty were living in families where at least one person was working.¹¹ A recent report concluded that families on low incomes cannot afford a basic standard of living, due to the rising cost of living and to welfare and tax reforms.¹²

The Social Metrics Commission (an independent body set up to develop a new approach to measuring poverty in the UK) concluded that there were 14.2 million people in poverty in 2016-17, of which 4.5 million (32.6%) were children.¹³ The Commission's analysis did not just look at incomes but included a range of other factors, such as rent/mortgage payments, childcare costs and the extra costs incurred by disabled people.

Research on the scale, nature and drivers of destitution found that 1,550,000 people, including 365,000 children, were destitute in the UK sometime in 2017. Destitution was defined as the lack of two or more of six key necessities (food, shelter, heating, lighting, clothing and basic toiletries).¹⁴

The EHRC concluded that the changes to benefits, tax credits and UC introduced since 2010 have had disproportionate and negative

Graph 1: Poverty rates, by region and age, 2016/17

Source: Social Metrics Commission (2018) *Family resources survey and HBAI dataset (2016-2017) SMC analysis in measuring poverty*

impacts on low-income groups, with more children living below an adequate standard of living, despite rising employment levels.¹⁵

Another study found that those on low incomes also face a 'poverty premium' by having to pay more for essential goods and services, and that 44% of families in crisis often do not have basic items such as beds or clothing for their children.¹⁶ Schools have also reported that many parents do not have enough money to buy washing and hygiene products for their children resulting in teachers stepping in to buy basic items like toothpaste.¹⁷

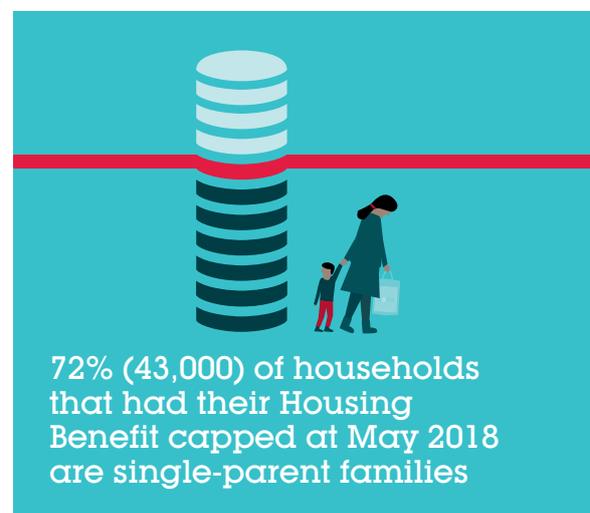
No strategy or targets for addressing child poverty

There has been no progress on re-introducing binding targets to eradicate child poverty in England or developing a strategy for achieving them, despite calls by the UN Committee and the EHRC. This is in stark contrast with efforts in Scotland where the Child Poverty (Scotland) Act 2017 included income-based targets and statutory targets to reduce child poverty by 2030.¹⁸ The government's insistence on maintaining the 'two-child limit' for UC and tax credit is particularly regressive and could lead to an estimated 200,000 additional children in poverty.¹⁹

Universal Credit and cuts to social security affect the most disadvantaged

Ongoing cuts and caps on social security benefits, combined with rising housing costs, delays in payments and insecure and insufficiently paid work, continue to disproportionately affect children from poorer families, and those with a disability.

Analysis by the EHRC showed that households with children are the largest group to lose out from recent reforms to taxes and transfer payments, with lone parents losing an average of £5,250 (almost a fifth of their total net income) and couples with children losing an average of £3,000 per year.²⁰ Further analysis by the EHRC concluded that overall public spending in England is expected to fall by 18% between 2010-11 and 2021-22 (compared to 5.5% in Wales and 1% in Scotland), with the greatest income losses and cuts to schools, transport and housing being felt more acutely by poorer households.²¹ In England, the poorest two deciles experience an average loss of over 11%, compared to little or no impact on those in the top two deciles. This represents a particularly regressive impact, with BAME households and those with disabilities having disproportionately higher income losses²²



Source: Department for Work and Pensions, *Benefit Cap Data to May 2018*, Official Statistics, Quarterly, Published: 2 August 2018

Single-parent households (mainly female) lose more than any other demographic group in terms of final income, with a loss of 18.7% in England, and households with three or more children experience greater losses than those with fewer or no children, mainly due to cuts in social care and the two-child limit on housing benefit, tax credits and UC.²³

47% of children in single-parent families live in relative poverty²⁴ – despite the fact that 67.1% of single parents are working.²⁵ Given that 90% of single parents are women,²⁶ regressive cuts and changes to social security disproportionately discriminate against women.

The two-child limit disregards the fundamental principle of the child's best interests and breaks the link between children's needs and the support they receive. It is also discriminatory as it penalises families with more children.

The benefit cap and the two-child limit also disproportionately affect Gypsy/Roma and Traveller communities, who tend to have larger-than-average families and many single-parent families. These communities, already among the most disadvantaged ethnic groups in the UK, risk being marginalised further. The digital nature of UC has also created problems for Gypsy/Roma and Traveller households, as they tend to have less access to the internet and lower rates of literacy and digital skills.²⁷ For more information on discrimination faced by Gypsy/Roma and Traveller children see Briefing 2.

Rising levels of food poverty and 'holiday hunger'

Food poverty among children continues to increase. While there is no national measure of food insecurity²⁸ and no systematic data gathering, information collected by foodbank networks show an increase in people accessing foodbanks. Data from The Trussell Trust showed a 13% increase in the distribution of emergency food supplies from April 2017 to March 2018.²⁹ 484,026 of these supplies went to children. Their data showed the growing proportion of foodbank referrals were due to social welfare benefits not being sufficient to cover basic needs.

Schools have raised the alarm at the number of children going to school hungry and who rely on school meals to get enough to eat.³⁰ There has also been increased concern over

'holiday hunger', with families being unable to afford sufficient food during school holidays, and no coordinated response to food insecurity during holiday time.³¹

Some schools and communities have responded by setting up holiday clubs which provide a combination of meals and activities to children in need. The School Holidays (Meals and Activities) Bill was introduced, aimed at providing a framework for provision of food and activities during the holidays in England and Wales. However, the government decided not to support this Private Members' Bill, arguing that primary legislation is not their chosen method of resolving the issue. Instead they offered funding for some pilots.³²

The introduction of the £7,400 income threshold for eligibility for free school meals for those on UC has raised fears that approximately one million children in the UK are set to miss out on their entitlement to free school meals.³³ There are also concerns about the negative effects on work incentives and of risks of exacerbating poverty for families on UC.³⁴ Instead, extending free school meals to more children would help to enhance children's health and wellbeing, and their education.

There are reports that the government is planning to commission a study on the increase in foodbanks, but there has been no official announcement³⁵ and no action has been taken to reduce their use, despite the UN Committee's call to '*regularly monitor and assess the effectiveness of policies and programmes on child food security and nutrition.*'³⁶ See Briefing 7 on Health.

Destitution among NRPF families

Local authorities are regularly failing to meet their responsibilities to vulnerable families under Section 17 of the Children Act 1989, which places a duty on them to support *all* children and families in need. Destitute migrant families with 'no recourse to public funds' (NRPF) are regularly failed by councils who refuse to provide accommodation or financial support, leaving children homeless.³⁷ Many families who tried to access assistance from local authorities were refused a 'child in need' assessment and those who did get help received only subsistence level support. Schools have reported that children are not able to access free school meals because their parents are categorised as NRPF.³⁸

Research found local authorities are using tactics which might be intended to deter families from claiming support, including threats to take children into care, misinforming families regarding eligibility, attacking parents' credibility, alongside aggression and racism. Families that do manage to access a Section 17 assessment often face an intrusive process which is often primarily focused on the credibility of the parent, not the welfare of the child.³⁹

Lack of affordable childcare for all

The government has expanded the provision of free childcare by an additional 15 hours for 3- and 4-year-old children whose parents earn a minimum of the equivalent of 16 hours per week at the national living or minimum wage, and less than £100,000 a year. The introduction of 30 hours childcare provision is welcome for many families, but government needs to ensure it doesn't have an adverse impact on access to childcare for disadvantaged families. For more information on quality of childcare see Briefing 6.

Homelessness

Children illegally accommodated in B&Bs and adult accommodation

Local authorities continue to break the law by accommodating children in bed and breakfast (B&Bs) for longer than six weeks.⁴⁰

At the end of March 2018 2,230 families with children, including those headed by a child, were housed in B&Bs; nearly 40% (830) were there for longer than six weeks.⁴¹ Although this represents an improvement on the same quarter in the previous year,⁴² overall numbers of homeless households housed in B&Bs have grown by nearly 250% since 2009.⁴³ However, shockingly, council owned B&Bs or other hotel style accommodation are not subject to the regulations preventing families from being held there for longer than six weeks. Our FOIs show 1,641 families with children were held in council owned B&Bs and hotel style accommodation in 2017, with almost two thirds (1,056) for longer than six weeks. Almost half (46%) of councils were using such accommodation. The true figure is likely to be much higher as we only received information from 58% of all councils.⁴⁴

The Homelessness Code of Guidance states that B&B accommodation is never suitable for 16 and 17-year-olds, even on an emergency



Council owned B&Bs and hotels are not bound by the law so families can be held there for longer than 6 weeks.

1,641 families were held there in 2017, with almost two thirds (1,056) for longer than 6 weeks.

Source: CRAE FOIs to 353 local authorities (December 2018)

basis.⁴⁵ At the end of March 2018 there were 25 households headed by 16 and 17-year-olds in B&B accommodation, of which five had been there longer than six weeks.⁴⁶ 16 and 17-year-olds are automatically considered to be in priority need and eligible for support from the council under the Housing Act, but councils must also refer them to children's services to determine whether any additional duty is owed under the Children Act 1989.⁴⁷ Frontline workers have raised concerns that many children aged 16-17 are not being accurately assessed or given support due to them under Section 17 or Section 20, and are, despite guidance, being illegally housed in B&Bs.

Department for Education figures show that 3,090 looked after children (LAC) were housed in independent accommodation last year which often lacks live-in staff support and includes unsupervised B&Bs.⁴⁸ A 28% rise from 2,420 in 2010. According to FOIs carried out by The Guardian, four local authorities have placed up to 14 children in caravan parks and 17 councils have placed up to 133 children in B&Bs over the past two years.⁴⁹ Further FOIs carried out by CRAE reveal that in 2017, 1,173 looked after children were housed in independent accommodation for longer than 6 months, including 19 children aged 15 and one aged 14. The real number is likely to be far higher as only a quarter of councils responded that they held this information.⁵⁰

Huge numbers of children continue to be housed in Temporary Accommodation (TA)

At March 2018, 123,130 children in families were housed in TA, an increase of 2,610 on the previous year.⁵¹ Over 70% (87,310) of these

Case study

Just for Kids Law

Failures to house and support a vulnerable young person

Tom* was 19 years old when he approached Just for Kids Law (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 he 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 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. He 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, and provide him with leaving care services to assist him transition into young adulthood. This challenge was successful and he is now being provided with support and most of his rent arrears have been cleared.

*Not his real name

children are in London, where the problem continues to be especially acute. Children housed in TA, particularly hostels, often face similar conditions to those living in B&Bs. Very young children have nowhere to play, crawl and learn to walk, and parents often struggle to set up regular sleep routines or potty train, while older children have no privacy and have nowhere to study or socialise with friends.⁵² **Over 16,000 households with children are currently accommodated in hostels and pay-by-night accommodation.**⁵³ Alarmingly there is no legal limit on how long children can be housed in these settings. Children living in TA are being put at risk, often placed alongside adults with drug and alcohol problems.⁵⁴ Children we spoke to in recent

research told us about feeling at risk: "You'd always see people smoking joints and other stuff, and loads of alcoholics sitting about. I never felt safe there." (Carl, 16)⁵⁵

Out of area placements

Worryingly, increasing numbers of families housed in B&Bs and TA are being placed outside of their local area, sometimes by great distances. This often results in loss of essential support networks, employment and education.

In 2018, 22,020 households were placed in TA out of area, a shocking rise of over 300% since 2010 (5,430).⁵⁶ Despite law and guidance requiring councils to place families (where practical) in the borough in which they are resident,⁵⁷ local authorities are still moving households out of area due to reductions in benefits, problems with the UC roll-out and increasing rents.⁵⁸ This is particularly problematic in London where 1,200 families have been placed out of area in the first quarter of 2018, a rise of 46% on the same period in the previous year, with some families placed as far as Glasgow, Newcastle and Cardiff.⁵⁹ In Birmingham nearly 2,000 households were moved out of area, all but 77 of whom were placed into B&B.⁶⁰ This is against the best interests of many children.⁶¹

Insecure private rental tenancies pushing more families towards homelessness

Since 2012, the end of assured shorthold tenancy has become the leading cause of statutory homelessness. In 2010-11, 6,630 (15%) applicants lost their last settled home because of the end of an assured shorthold tenancy. In 2016-17, this had risen to 18,270 (31%), an increase of 176%.⁶² Research estimates that 94% of homelessness cases caused by the end of a private tenancy are the result of evictions made under Section 21 of the Housing Act 1988, which allows landlords to evict tenants without cause.⁶³ The freeze on Local Housing Allowance (the benefit to support households with costs of private renting) has resulted in rates being so seriously out of line with local rents that private renting has become unaffordable for most low-income households, and this substantially increases their risk of homelessness.⁶⁴

Local authorities can make Discretionary Housing Payments (DHP) to help families struggling with housing costs, but organisations have found that the extra DHP funding provided to help mitigate

the benefit cap is not proportionate to the rise in demand across the country. Because they are discretionary, temporary and uncertain, they are not an adequate and durable solution to protect vulnerable families with children. Shelter have identified that *'access to longer fixed-term contracts would ensure that private renters, including many families with children, are able to access a settled home and avoid the risk of homelessness.'*⁶⁵

Social security cuts deepened

Rising numbers of homeless children can be mainly attributed to the impact of cuts to welfare, combined with a chronic shortage of social housing and rising costs of private sector rentals. Increasing numbers of households have had their Housing Benefit (HB) capped, 60,000 households at May 2018 (an increase of 0.5% since February).⁶⁶ The benefit cap is usually applied by reducing the amount of HB households receive, although 5,800 households also had their UC capped in the same period. As stated above, single-parent families are especially affected.

40% of local authorities and 55% of homelessness providers reported an increase in youth homelessness and rising demand for their services in the last year.⁶⁷ Over a quarter of young people accessing services in this period are aged 16 or 17 years-old.⁶⁸ A key factor in the rise is the impact of welfare reforms with over 90% of housing providers identifying delays in receiving UC, alongside benefit sanctions (90%) and the cap on housing benefit (80%), as impacting on youth homelessness rates. The main reason for young people needing housing (49%) is parents or carers no longer being willing or able to offer them accommodation and research has identified welfare reforms as a contributing factor to this.⁶⁹ Government provision of £1.2 billion up to 2020 to try to reduce all forms of homelessness and investment in the 'Fair Chance Programme' to support 18-25-year-olds with specific needs are both welcome, but do little to add support to 16- and 17-year-olds who urgently need housing.⁷⁰

Lack of funding to implement Homelessness Reduction Act

The Homelessness Reduction Act (HRA) 2018 has introduced some positive changes. However, concerns have been raised that there is not enough funding available to local authorities

to meet their new duties. The potential benefits of the HRA will not be realised without improvements to wider housing and welfare policy to address the causes of homelessness and to ensure homeless households have access to settled, affordable and suitable housing.⁷¹ Without these improvements, unintended consequences such as 'gate keeping' of services, unlawful decisions, increased out-of-area moves and repeat homelessness could increase, with damaging consequences for children and other vulnerable applicants.⁷² Research shows 57% of councils nationally are struggling to fulfil their new duties to 16-24-year-olds, which it is estimated have required them to make 45,000 additional assessments a year.⁷³ FOI requests show that 66,500 young people approached their local councils to ask for help, but of these 58% did not receive a positive outcome and only 13% received a positive outcome. London Councils have assessed that the increased burden due to the HRA requires additional funds of £77 million per year in London alone. The government has only committed £24.2 million per year for the increased burden across the whole of England.⁷⁴ For more on homelessness among Roma/Gypsy and Traveller communities, see Briefing 2.

Discriminatory right to rent checks for migrants

The Windrush scandal⁷⁵ exposed discriminatory policy-making and increased public concern over the government's 'hostile environment' approach.⁷⁶ Nonetheless, the right to rent scheme, which requires landlords and agents to check the immigration status of all potential tenants and to deny tenancy to foreign migrants or risk a fine or a potential five year prison sentence,⁷⁷ remains in place in England.⁷⁸ Research carried out in 2017 found 51% of landlords said the scheme would make them less likely to let to foreign nationals, while 48% stated the fine made them less likely to rent to someone without a British passport.⁷⁹ The Joint Council for the Welfare of Immigrants and the Residential Landlords Association successfully sought a Judicial Review of the scheme this year,⁸⁰ and is currently awaiting judgement. Positively, the Home Office has signalled it may be willing to engage with the private rental sector, which has raised multiple concerns about the right to rent scheme, by re-convening its Private Rental Stakeholder Panel.⁸¹

Recommendations

1. The government should urgently develop, fund and implement an action plan to reduce the number of children in poverty and ensure progress, monitoring and reporting continues against the indicators in the Child Poverty Act 2010.
2. The government must reverse its regressive social security reforms and ensure that social security benefits are sufficient to enable all households to have an adequate standard of living.
3. The government should exclude children's benefits, including child benefit and the child element of UC, from the scope of the benefit cap, and abolish the two-child limit on child tax credit and UC.
4. The government should end the freeze on children's benefits and ensure that any benefits affecting children are given a "triple lock" guarantee so that they rise each year in line with inflation, earnings or 2.5% (whichever is higher).
5. The government must introduce a national strategy to reduce and prevent food poverty and undertake regular monitoring of food insecurity, including by introducing an annual household food insecurity measurement.
6. The government should extend the eligibility for free school meals to all households on Universal Credit, and those with no recourse to public funds, including through breakfast clubs and during the holidays.
7. The government should ensure that LAs meet their statutory obligations under Section 17 of the Children Act 1989 and provide the necessary support to families with NRPF.
8. The NRPF condition should not be applied to parents with leave to remain in the UK where they have children under 18 years old.
9. The government should extend the new 30 hours childcare provision to all parents seeking work or undertaking work-related training. Funding for the scheme should be increased so that nurseries can cover their costs to deliver it.
10. The government should take immediate action to stop children in families being housed illegally in B&Bs.
11. A duty should be placed on LAs to more accurately collect numbers of children in families being placed in B&Bs including council owned accommodation.
12. The Local Government Ombudsman should take pro-active steps to stop LAs using B&Bs beyond six weeks and action should be taken when they break the law.
13. The government should extend the six-week legal limit of housing children in B&Bs so it also applies to children in TA, council owned B&Bs and hotel style accommodation.
14. TA used for families must not have shared facilities and must be child-friendly, clean and safe. It should be inspected every week to two months.
15. The government should make a significant investment to build new social housing to reduce the numbers of homeless households in TA and the length of time they stay there.
16. The government should legislate to introduce a strengthened requirement for LAs to commission sufficient alternative emergency accommodation.
17. The government should commission an independent review to monitor the practices and process of LAs placing families out of area, to ensure that it is an action only of last resort and that children's needs and best interests are always considered.
18. Children and young people should never be housed in B&Bs, hotels or caravan parks. Before placing any child or young person in independent accommodation, LAs should conduct a safeguarding check and risk assessment. They should give careful consideration to whether on-site or visiting adult support is appropriate for their needs and put in place arrangements to ensure they can contact support services out of hours.
19. The DfE and LAs should reform how data on the number of children and young people placed in independent accommodation is recorded and collated, and publish this data quarterly.
20. The government must ensure additional funding so that LAs can meet their new responsibilities under the Homelessness Reduction Act.
21. The government should exempt homeless households from the benefit cap.
22. The Right to Rent scheme should be ended and there should be no further expansion of the scheme until the government undertakes an independent evaluation of both the success and impact of the scheme.

Endnotes

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- 2 United Nations Universal Periodic Review (2017) *United Kingdom, British Overseas Territories and Crown Dependencies. Annex to the response to the recommendations received on 4 May 2017*
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- 4 Equality and Human Rights Commission (2018) *Is Britain Fairer?*
- 5 Hood, A., Waters, T. (2018) *Living standards, poverty and inequality in the UK: 2017–18 to 2021–22* Institute of Fiscal Studies
- 6 Equality and Human Rights Commission (2018) *The Cumulative Impacts of Tax and Welfare Reforms*
- 7 Esther McVey, Secretary of State for Work and Pensions *Universal Credit* House of Commons (5 November 2018), Hansard Volume 648, Column 1248
- 8 National Audit Office (2018) *Rolling out Universal Credit*
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- 11 Department for Work and Pensions (22 March 2018) *Children income data tables produced as part of the Households Below Average Income (HBAI) report: 1994/95 to 2016/17*, Time Series, Table 4.6ts
- 12 Hirsh, D. (2018) *The cost of a child in 2018* Child Poverty Action Group
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- 16 Buttle UK (2017) *The Real Face of Child Poverty in the UK in 2017*
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- 19 Child Poverty Action Group (2017) *Broken promises: What has happened to support for low-income working families under Universal Credit?*
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- 25 Office for National Statistics (2018) *Working and workless households in the UK: April to June 2018*, Table P.
- 26 Gingerbread (20 September 2018) 'Single Parent Statistics'
- 27 Friends, Families and Travellers and National Federation Gypsy Liaison Groups (2018) *Joint Submission to the United Nations Special Rapporteur on extreme poverty and human rights*
- 28 A Private Members' Bill, Food Insecurity Bill 2017-19, which would require the government to monitor and report on food insecurity and to provide official statistics on food insecurity, was introduced in 2017 and is going through Parliament.
- 29 The Trussell Trust (24 April 2018) "Benefit levels must keep pace with rising cost of essentials" as record increase in foodbank figures is revealed' Press release
- 30 Richardson, H. (2 April 2018) 'Child poverty: Pale and hungry pupils 'fill pockets with school food' *BBC News*
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About CRAE

The Children's Rights Alliance for England (CRAE), part of Just for Kids Law, 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.

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