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LGBTQ+ Youth Homelessness: Law and Policy Briefing and Recommendations

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1. Executive Summary

This report identifies areas for improvement for government and local authorities to better support young people experiencing homelessness, and to prevent it from happening in the first place. The report accompanies a wider research project, in which we explore experiences and journeys of LGBTQ+ young people experiencing homelessness (Tunaker et al 2025). As such, this report should be read in conjunction with the wider research project findings.

From our law and policy review, we found that current provisions do not adequately protect LGBTQ+ individuals from homelessness. Existing policies at local and government level do not target this group consistently, despite evidence that they are twice as likely to experience hidden homelessness. In our work we found local authority areas of excellence where issues were dealt with effectively and sensitively, and we make recommendations to use these as a road map for change across the country. One of our most important findings is that we must take into account intersections of protected characteristics when establishing the vulnerability of applicants for homelessness support from the state.

In summary, we recommend:

Law and Policy

1. The Homelessness Code of Guidance should emphasise the importance of the contextual consideration of intersecting protected characteristics.
2. Section 179(2) should be amended to specifically include young LGBTQ+ people as a group who must be considered when designing advisory services.
3. Central Government should review guidance to ensure it reflects the particular vulnerability of young LGBTQ+ people who are homeless, including guidance on (1) the relationship between children's services and local housing authorities about their duties under Part 3 of the Children Act 1989 and Part 7 of the Housing Act 1996 to secure or provide accommodation for homeless 16 and 17 year old young people, (2) safeguarding in the context of emergency accommodation/night shelters.

Local Authorities

1. All local authorities should consider the potential intersecting protected characteristics of young LGBTQ+ people, including the risk of discrimination when placed in a private sector tenancy.
2. All local authorities ensure they consider the particular needs of young LGBTQ+ people in the development of their homelessness, rough sleeping and housing strategies;
3. Local authorities need to exercise caution in the provision of mediation services, given the particular challenges experienced by young LGBTQ+ people. Such services must be placed in the context of a heightened risk of parental rejection, domestic and sexual abuse, and mental health issues experienced by young LGBTQ+ people.
4. Local authorities should expand inclusive housing policies for homeless LGBTQ+ youth by explicitly including them in policy provisions and offering dedicated support and referral services, particularly in regions with high poverty and unemployment.

Central Government

1. Central Government should provide targeted and specific funding to provide LGBTQ+ specific services for LGBTQ+ people experiencing homelessness, such as shelters, supported accommodation and safe houses.
2. We ask that Central Government reviews and considers its provisions for young LGBTQ+ people at risk of or experiencing homelessness, including training for staff regarding domestic abuse and exploitation for this group.

2. Introduction

This briefing should be read in conjunction with the research report 'LGBTQ+ Youth Homelessness and Intersectionality Review' (Tunaker et al 2025). The research was commissioned by akt (formerly known as Albert Kennedy Trust) and carried out by

researchers from University of Kent, University of Bristol and University of Southampton. The aim of this briefing is to highlight areas for improvement to better support LGBTQ+ young people that are at risk of or experiencing homelessness.

The report is in 6 parts. After setting out our methodology in Part 1, we provide a brief knowledge review in Part 2, before setting out the legal context in Part 3. Parts 4 and 5 analyse caselaw and a Prevention of Future Deaths report, provide a review of local authority policy and information provision and set out recommendations for improvement. Part 6 sets out our collated recommendations and concludes the report.

Our research identifies a range of ways in which support for Lesbian, Gay, Bisexual, Trans, Queer/Questioning (LGBTQ+) young people experiencing homelessness might be improved. We note how national law and policy could be improved, we highlight inconsistencies across England and Wales, and we focus on best practice to illustrate ways in which policy can be improved at a local level. Our research concludes that a well-designed and implemented local authority policy for LGBTQ+ youth homelessness is effective in reducing such homelessness even where the area struggles with issues of unemployment and poverty, and we argue that a range of law and policy changes can effectively alleviate this issue.

3. Methodology and Research Questions

Our legal and policy review was local authority focused and considered strategic inclusion of LGBTQ+ young people, building upon akt's [2022 Inclusive housing support](#) work. We carried out the following review and analysis:

1. Review of Local Authority websites and strategies.
2. A review of case law relating to LGBTQ+ homelessness cases.
3. Survey to organisation working in homelessness and housing (see our full report for details of these findings).
4. Qualitative research, including interviews with young LGBTQ+ people experiencing homelessness.
5. Cross-review of available public data relating to poverty and employment rates in each of the targeted Local Authority areas.

In our review of local authority websites and the Local Government Association (LGA), we selected geographically diverse authorities, along with recommendations from akt, which identified regions with high concentrations of homeless clients. Local authorities reviewed were Oldham, Brent, Bristol City Council, Durham, Ealing, Gateshead Council, Hackney, Haringey, Islington, Lambeth, Lewisham, Manchester City Council, Margate, Newcastle, Newham, North Yorkshire Council, Norwich, Rochdale, Salford, Somerset, Tameside, and Tower Hamlets. For each authority, we systematically reviewed key documents such as housing strategies, homelessness strategies, action plans, accommodation strategies, allocation schemes, local housing needs assessments, tenancy strategies, equality impact assessments, and any relevant posts. Using targeted keywords like "homeless," "youth," "LGBTQ," "queer," and "transgender," we identified references to young LGBTQ+ homelessness and documented measures or plans addressing their needs. Our research focused on 5 questions:

- (1) Is there any specific reference to LGBTQ+ people in the policies?
- (2) Is there any specific reference to LGBTQ+ young people in the policies?
- (3) Does any reference to LGBTQ+ young people discuss priority need/vulnerability?
- (4) Are there any referral sources for LGBTQ+ young people cited?

(5) Are there any references to provision for young LGBTQ+ people other than in the policies?

Authorities were categorised into five groups based on policy inclusion:

- 1) Comprehensive support for young LGBTQ+ individuals,
- 2) Acknowledgment without referrals,
- 3) Focus on LGBTQ+ broadly with limited referrals,
- 4) Broad mentions without provisions, and
- 5) No mention of LGBTQ+ homelessness at all.

This approach offers a detailed analysis of how local policies interact with economic factors to impact homelessness in this vulnerable population.

In relation to caselaw, using a legal database, we undertook analysis of all caselaw in the High Court, Court of Appeal and Supreme Court, where a decision related to Part VII of the Housing Act 1996, and contained one of the terms 'LGB', 'LBGT', 'LGBTQ+', 'lesbian', 'bisexual', 'gay', 'trans', 'queer', 'intersex' and 'asexual.' Only one relevant case was identified. ^[2] We also searched Prevention of Future Death reports held by the Chief Coroner for reports including the phrase 'homeless'.

We also examined how poverty rates (post-housing costs), youth unemployment rates, and local-authority housing policies impact the geographical distribution of homelessness among young LGBTQ+ individuals (akt client data in 2023-2024). Detailed regional-level (Nomenclature of Territorial Units for Statistics Level 2) youth unemployment rates (2018-2021) were obtained from the Department for Work and Pensions (DWP). Broader regional level (NTUS Level 1) poverty rates (2020/21 to 2022/23) from the Office for National Statistics (ONS). By utilising data from earlier years, we accounted for long-term economic pressures contributing to housing instability and considered the time lag between economic hardship and increased homelessness.

To assess housing policy support, we developed a local authority policy index based on our review of local government documents mentioned above. The index assigns scores for three aspects: 0.5 points if policies mention LGBTQ+ people, 1 point for specific mentions of LGBTQ+ youth, and 0.3 points for providing referral resources for LGBTQ+ homelessness. Each local authority's total score, ranging from 0 (no support) to 1.8 (comprehensive support), reflects the level of support for

LGBTQ+ youth. This index, combined with poverty and youth unemployment data, allows for a detailed analysis of correlations between structural factors and LGBTQ+ youth homelessness. Finally, we merged these macro-level datasets with akt client data based on their local authority or the regions of their respective local authorities, and calculated the LGBTQ+ clients percentage within each local authority for descriptive analysis.

Our qualitative research was carried out in four field sites: Manchester, Newcastle, London and Bristol. We interviewed staff members at akt and in other similar organisations, both in person and via phone or video calls. We also spoke with LGBTQ+ young people experiencing homelessness. Full details of our qualitative research is available in the full research report.

4. Knowledge Review

For our findings on the causes and scale of LGBTQ+ youth homelessness please see [here](#). In this knowledge review we focus on what we know about how law, policy and practice respond to the problem of LGBTQ+ homelessness.

Our starting point is that that law, policy and practice often fails to include LGBTQ+ people and is insensitive to their specific needs (England and Turnbull 2024). Carr et al (2022) suggest that although the UK has arguably some of the most generous legal provision in relation to homelessness in relation to state responsibility, the law underpinning homelessness provisions is discriminatory by design. It was the plight of heterosexual homeless families that stimulated the radical reforms contained in the Housing (Homeless Persons) Act 1977 which continue, in moderated form, to provide a housing safety net for people threatened with or experiencing homelessness. As Carr et al point out, the law and the priority given to heterosexual families with children reflected the values of the times.

Those times can be crudely characterised as the height of a postwar welfare consensus marked by heteronormativity, and an understanding that social citizenship offered was conditional upon conformity with the desirable norm of a two-parent families comprising male breadwinners and female carers (Carr et al 2022: 4).

For Wilkinson (2013) there has more recently been a shift in the heteronormativity of welfare provision as lesbian and gay rights in employment and family law have gradually been realised, and with the introduction of civil partnership and same sex marriage. Whilst this might suggest that the claims of homeless LGBTQ+ young people would be treated with equal respect as those claimants from heterosexual families, Wilkinson highlights a faultline in contemporary social policy. She argues that 'what we are witnessing is no longer compulsory heterosexuality, but *compulsory coupledness* (2013:207 emphasis in the original). The consequences of the compulsory coupledness that Wilkinson notes are that those claimants who are single, asexual/aromantic, or who prioritise friendship or other forms of kinship as their most important intimate connections are judged as failures, 'and not just personal failures but a failure to the nation as a whole.... it is clear that certain forms of intimate attachment were promoted as more important than others' (Wilkinson 2013: 211). Wilkinson's suggestions are important in the context of our review of law,

policy and practice; not only are the young people we are concerned with overwhelmingly single, but they have also often been excluded from more conventional family structures, disrupting or destroying long term relationships, and living outside of long-term relationships.

As early as 1998 Cowan argued that applicants for help with homelessness must not be 'inappropriate' i.e. they must not deviate from social expectations as to whom society should help (Cowan 1998). Yet despite the shifts in social attitudes noted above, there continues to be evidence that behaviour which does not fit family norms has an impact upon how local authority housing officers view claims upon the state. In a study of local authority housing officers' responses to housing claims made by survivors of domestic abuse, Little (2023) notes the extent to which those responses are shaped by conventional understandings of love, family and home. Her research shows that:

Housing professionals make assumptions about the failure of individuals fleeing DVA to manage intimate relationships and, in particular, to avoid harmful forms of 'love'. These professionals' capacity to care, I suggest, is shaped partly by their view that love renders the victim/survivor of DVA chaotic, destructive, and incapable of self-care. Dominant views of romantic love help to reinforce the position of victims of violence from intimate partners as lacking in power and agency as essentially self-inflicted (2023:72).

In conditions where gatekeeping is inevitable, and judgements must be made about whose claims to prioritise (Bretherton et al 2013, Alden 2015, Hunter et al 2016), these views have consequences. They inform decision-making around whose claim is deserving and whose is not.

Little's recognition that the claims of survivors of domestic violence need to be contextualised 'in a recognition of the ambiguous and often contradictory experience of home as a space not of belonging, intimacy, and desire but of alienation, violence, and fear (2021:71) is we suggest also true of the claims of the young homeless LGBTQ+ population, for whom domestic violence and abuse is commonplace as we have demonstrated in our report. Another of her observations, that specialist support workers were less critical of claimants is also important in the context of this research. They were prepared to recognise 'the importance of

an approach that 'treated' the whole person and understood multiple and complex needs' (Little 2023:82) suggesting that expertise and even lived experience adds value to decision-making around the claims of young homeless LGBTQ+ claimants.

The final point to emerge from the knowledge review is the importance – and absence – of safe spaces for homeless young people, particularly those who are the survivors of abuse. The evidence suggests that LGBTQ+ young people more frequently felt unsafe in refuges and other settings than heterosexual homeless young people (DiGiuseppi et al 2022). This is linked with the complex trauma histories experienced by homeless LGBTQ+ young people and exacerbated by frequent rejection by family and peers. As DiGiuseppi et al (2022) observe, their research highlights the need for inclusive and culturally competent services. The lack of safe spaces and the lack of knowledge about what constitutes a safe space should be taken into account in decisions about whether offers of accommodation are suitable.

Sefcik (2023) notes the absence of research, particularly from the perspective of lived experience about what constitutes a safe space for those who are trans and/or gender non-conforming (GNC) whose needs should not be conflated with those of the broader LGBTQ+ population. This knowledge gap is a serious concern.

5. The Legal Context

The primary legislative provisions which govern the responsibilities of English local authorities towards homeless individuals are contained in the (much amended) Housing Act 1996, Part VII, in sections 175 to 218. These provisions are supplemented by a statutory Code of Guidance, which provides more details on how to implement the duties on local authorities: <https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities>.

The law provides that local authorities have a duty to provide a range of information, advice and assistance free of charge to people who are homeless or threatened with homelessness. The Code suggests at para 3.1 that 'The provision of up to date, comprehensive, tailored advice and information will play an important part in delivering the housing authority's strategy for preventing homelessness.' While the advice and information must be available to everyone, the reference to it being tailored is because the legislation provides that it should be designed with statutorily defined vulnerable groups in mind, including

- (1) Persons released from prison or youth detention accommodation,
- (2) Care leavers,
- (3) Former members of the regular armed forces,
- (4) Victims of domestic abuse,
- (5) Persons leaving hospital,
- (6) Persons suffering from a mental illness or impairment, and
- (7) Any other group that the authority identifies as being at particular risk of homelessness in the authority's district.

Where an individual approaches the local authority for help, they have a range of duties which can be engaged, depending on the circumstances of the individual applicant. The Code of Guidance includes a useful outline of those responsibilities here: <https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities/overview-of-the-homelessness-legislation>.

Where someone meets specific criteria (they are eligible and are homeless/threatened with homelessness), there is a duty to assess them, and for the local authority to develop a personalised housing plan. There is a duty to take reasonable steps to prevent/relieve homelessness for any eligible person, and a duty to provide interim accommodation while an application is being considered

if a person is eligible and in priority need. If the applicant has a 'main housing duty' then the local authority is required to secure suitable accommodation for them. This duty will arise if an applicant is found to be eligible, homeless, in priority need and not intentionally homeless (but if they lack a connection to that council and have a connection elsewhere, they may then be referred elsewhere). The law is complex and technical, with a great deal of caselaw governing the interpretation of these provisions. In previous research^[1] we noted that it is common for local authorities to emphasise that it is very difficult for applicants to get housing and support, with long periods in temporary accommodation if an applicant is successful, so it is best to seek help elsewhere if possible. The same research found that local authority websites also often provide lists of other organisations who might be able to help, and act to refer individuals to such organisations.

Further duties fall on local authorities to carry out a review of homelessness in their area. Following this review, they must formulate a homelessness strategy aimed at preventing homelessness in their district and ensuring there is support for those who do become homeless. The legislation (The Homelessness Act 2002) requires that a new strategy must be published at least every 5 years, beginning with the date of the previous strategy, and that local authorities must take this strategy into account when exercising their functions.

Local authorities are also required to publish policies setting out how they will allocate social housing. They are required to have a published allocations scheme, and to allocate properties according to that scheme. Such allocation schemes must give preference (known as 'reasonable preference') to particular applicants, including people experiencing homelessness. There is provision that certain individuals must be given additional preference, where they have urgent needs. However, there is no definition in the regulations of the meaning of 'urgent need' or 'additional preference'.

Local authorities are allowed to determine their own priorities in allocating housing accommodation to people who fall within the preferential categories, and are permitted to take into account the applicant's financial resources, their behaviour (or that of a member of their household) which affects suitability to be a tenant; and any local connection which exists between a person and the authority's district. As with their homelessness duties, local authorities are required to make information and advice about the right to make an application freely available.

5.1 Caselaw Analysis

There was only one case which emerged from our analysis of caselaw, the important and instructive decision in *Michelle Biden v. Waverley Borough Council* [2022] EWCA Civ 442 in the Court of Appeal, handed down on 1 April 2022.

The issue in the case was whether there were sufficient inquiries made about whether a property offered to a disabled trans applicant, in order to satisfy the main housing duty. The law provides that any property offered to an applicant must be suitable, and the meaning of suitable is developed in the Code of Guidance. Suitability includes consideration of 'all aspects of the accommodation in the light of the relevant needs, requirements and circumstances of the homeless person and their household' and will include space, arrangement, location, particular medical/physical needs, and social considerations including risk of violence, racial or other harassment in a particular locality (see Chapter 17 of the Code, <https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities/chapter-17-suitability-of-accommodation>).

Local authorities are also bound to comply with the public sector equality duty. This provides that where people have a protected characteristic, local authorities have a responsibility to remove or minimise disadvantages which are connected to that characteristic. Protected characteristics include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Mrs Biden had the protected characteristics of gender reassignment and disability. When she applied for support from the local authority, they accepted they owed her a main housing duty and sought to identify a property for her. As part of this process, the housing officer sought advice from a police community support officer (PCSO), who advised on the safety of a proposed property and area for Mrs Biden as a transwoman. Mrs Biden did not feel the property and area were safe for her and challenged the suitability of the property offered. This challenge was in part based on a failure by the local authority to seek advice from a specialist LGBT liaison officer, rather than a PCSO. The Court held that 'that it is entirely speculative to assume that the PCSO had not received awareness training on transgender issues and/or did not liaise with the LGBT liaison officer, or that the LGBT liaison officer, if approached directly by [the local authority], would not have liaised with the PCSO.' Importantly, the statement from Mrs Biden did not contain evidence

from a Surrey LGBT officer that contradicted the information from the PCSO, and it was not claimed that it was likely that the LGBT officer would have provided different evidence – instead, the barrister for Mrs Biden argued that engaging with the LGBT officer would ensure confidence with the process, and the court held that this is (hopefully) a byproduct of the review process, but not the purpose of it.

Useful guidance can be drawn from the decision, relating to both trans hate crime, but also LGBT hate crime more generally. The Court acknowledges the significance of operational guidance by the police, which includes recognition of the fact that ‘transgender hate crime is vastly under-reported’, and the value of LGBT specialist officers. It also recognises the significance of collecting and collating accurate information about different kinds of hate crime, and awareness training for all officers. Mrs Biden lost in part because it was not shown that the PCSO had not had such training, and because there was no evidence that the PCSO had not liaised with the LGBT officer.

It would be challenging for an applicant to establish either of these facts, and it is undesirable to have a system where the burden of proof is on the applicant to do so, but given that this is the decision of the court, applicants in future may need to establish this, and it would be advisable for applicants and their legal representatives to seek explicit confirmation of both issues.

However, it would be preferable for a local authority to liaise with the LGBT officer in the first instance, and ask them to gather local knowledge as required where there are concerns about potential LGBT hate crime in a given area. Such an approach would be an acknowledgement of the importance of ensuring that appropriate information is obtained and considered from the outset, increasing the prospect of reaching a sound conclusion and reducing the risk of challenge. It would pre-empt concerns and to maintain confidence in the system

Drawing on the expertise of LGBT officers could also be useful in seeking information about other decisions within the homelessness context, including when making a decision about whether an applicant is homeless or not (perhaps deciding whether they would be at risk of violence if they returned to a property they are otherwise entitled to reside in) or whether an individual is homeless intentionally.

This could be strengthened by directing in the Code of Guidance that such liaison take place.

Another valuable aspect of the case which may be applicable in other cases is the way in which the Court considered the approach of the local authority to the intersecting protected characteristics of Mrs Biden. The Court reiterated the importance of exercising the public sector equality duty 'in substance, with rigour and with an open mind' (drawing on the case of *Hotak v. LB Southwark* [2015] UKSC 30) and in this instance, the Court praised the approach of the decision maker, noting that, for example, the officer:

'recognised the nature of Mrs Biden's protected characteristics; see [22] above. She focused upon the consequences of Mrs Biden's disability in so far as it was relevant to her occupation of the accommodation offered to her in terms of lay out and access to current GP practice and support networks. She had regard to the disadvantages created by the 0.9-mile difference in location between the accommodation offered and that presently occupied by Mrs Biden; see [24] to [26] and [30] above. She identified the difference between Mrs Biden and a transgender individual without disability, or a disabled individual who was not transgender; see [32]. She had due regard to the possibility of victimisation; see [28] to [30]. The selection of accommodation had borne in mind that private landlords may positively discriminate against transgender individuals; see [30]. This is capable of being regarded as more favourable treatment of Mrs Biden's application.'

'60. I regard any attempt to categorise the inquiries made by [the officer] as displaying a disregard for the PSED as hopeless. [The officer] gave 'very sharp focus' to Mrs Biden's circumstances. She made a composite assessment, alive to Mrs Biden's protected characteristics, individually and in combination, and placed in the context of all other statutory guidance. [She] made relevant and reasonable inquiries of appropriate agencies, having regard to the concerns raised by Mrs Biden. Despite that advice, she nevertheless contemplated the possibility of the existence of transphobic abuse. The requirement to consider whether it was necessary to treat Mrs Biden "more favourably" did not require [the officer] to achieve a perfect match, nor did it require her to further Mrs Biden's express wish to relocate to Brighton.'

'61. Mr Straker freely concedes on Mrs Biden's behalf, that [the officer's] review is "highly competent" and "alive" to critical factors of proximity to Mrs Biden's present address, restricted mobility, access to medical care, and

general and specific safety concerns arising from her protected characteristics.'

Importantly, any decision which failed to engage in a similarly careful, contextual consideration of the ways in which protected characteristics might interact would be open to challenge. The consideration of potential discrimination by landlords in private sector tenancies is welcome. Following such an approach, as commended by the Court, would mean that local authority decision makers also consider potential discrimination arising from the intersection of age, sexual orientation and/or gender reassignment.

5.2 Recommendations from Caselaw Analysis:

- All local authorities should ensure that there is contact with police 'LGBT liaison officers' when seeking information relating to a homelessness application.
- The Homelessness Code of Guidance should direct that local authorities liaise with police 'LGBT liaison officers' when seeking information relating to an LGBTQ+ individual.
- All local authorities should consider the potential intersecting protected characteristics of young LGBTQ+ people, including the risk of discrimination when placed in a private sector tenancy.
- The Homelessness Code of Guidance should emphasise the importance of this contextual consideration of intersecting protected characteristics.
- Section 179(2) should be amended to specifically include young LGBTQ+ people as a group who must be considered when designing advisory services.

5.3 Inquest into the Death of Tobias Ryse Mannering-Jones

Inquest cases – investigations into unexpected or unexplained deaths by a Coroner – can give important insights into wider issues of concern, and this is why the inquest into the death of Tobias Ryse Mannering-Jones is discussed here.

When a Coroner who is investigating a death identifies circumstances which might give rise to future deaths, they have a duty to write to whoever might be able to

take steps to prevent those deaths, to bring the circumstances to their attention. The aim of such a report is to save the lives of others. Coroners cannot make recommendations of what steps ought to be taken, binding or otherwise, but are instead duty bound to notify those who might act to save lives, and whoever receives such a report is required to respond. Both reports and responses are sent to the Chief Coroner and are published on the Chief Coroner's website.

On 29 January 2024, HM Senior Coroner for South Manchester concluded an inquest into the death of Tobias Ryse Mannering-Jones. On 14 March, she sent a report to the Secretary of State for Health and Social Care, the Secretary of State for Local Government, and Greater Manchester Integrated Care. Each responded in mid-May 2024, and there is a great deal of detail in their responses, meriting careful review.^[1] We have summarised selected aspects of the materials below.

Mr Mannering-Jones was 19^[2] and the Coroner found that he was very vulnerable and had no support network. He became homeless at the end of December 2022 and, according to the report, 'generally slept at the Hostel for homeless people in Tameside where he was exposed to abuse due to his sexuality, felt unsafe, and was in the company of people who were significantly greater users of hard drugs.' The report describes contacts with six different organisations responsible for providing services in the two months before he died, including NHS services, Adult social care and mental health providers. It is unclear from the published papers whether there was a referral to homelessness services, as required by the Homelessness Reduction Act,^[3] but the Coroner did report that the inquest:

'heard evidence of the impact of homelessness and consequential vulnerability on a young person like Tobias and that the demands on Local Authorities meant that even where vulnerability was recognised there were not resources to offer sustained support and stable housing solutions. The evidence was that as a consequence young vulnerable people had to rely on homeless shelters where they were exposed to additional negative influences and as in Tobias's case abuse due to their sexuality.'

This was one of 5 issues flagged by the Coroner as matters of concern. Others related to problems that public services can experience with contacting people who are homeless, and two repeated themes across a range of Prevention of Future Death reports; delays and long waiting lists in provision of services (in Mr Mannering-Jones' case, mental health services) and issues with the effective

coordination of multiple agencies, meaning that information was not shared between different organisations. A further matter of concern was that,

‘The inquest was told that young adults who are homeless are often sexually exploited and that those who identify as LGBTQIA can be particularly vulnerable and that the underlying vulnerability and risk was not always appreciated by those dealing with young homeless people and that it could be mistaken by agencies as a lifestyle choice rather than what it actually was, i.e., exploitation by an older adult.’

Response from the Department for Levelling Up, Housing & Communities

The Secretary of State at the time, Michael Gove, responded on behalf of the Department for Levelling Up, Housing and Communities. His letter addressed each of the matters of concern set out by the Coroner in turn. His response refers to additional funding provided, and a range of initiatives which were underway relating to homelessness provision. It also notes statutory Guidance on the ways in which local authority social services and housing departments should work effectively together. This Guidance was last updated in 2018. It does note that ‘sexual identity’ is something to be considered by local authorities when assessing 16- and 17-year-olds who may be children in need. This is included at the end of the Annex which lists ‘Dimensions of need’, within ‘Identity’, and there is no elaboration of the ways in which young LGBTQ+ people might have distinct needs and what this might mean for the provision of services to them.^[4]

In relation to the concern raised by the Coroner that night shelters are spaces in which sexual abuse could take place, the Secretary of State made reference to published Operating Principles for Night Shelters,^[5] and referred to the Quality Mark provided by Housing Justice (an accreditation scheme for night shelters funded by the Government).^[6] The principles for maintaining a shelter include emphasis on a single room model where possible, and state that safeguarding must be prioritised. The reference to safeguarding provides a link to Local Government Association guidance on adult safeguarding,^[7] and in a discussion on ‘what needs to happen’ this guidance does highlight young people leaving care as an example of a transition which needs particular attention in a safeguarding context, and the guidance notes that ‘routes into homelessness can have a gendered dimension founded in abuse and violence in close relationships’ but there is no reference to the particular safeguarding issues which might arise in the context of young LGBTQ+ people who might experience homelessness.

In response to the concern that young LGBTQI+ people who are homeless are at particular risk of sexual exploitation, and that this is not always appreciated by those dealing with young people, the Secretary of State undertook to ensure that training and online materials provided by Homeless Link for 2024/25 covers 'supporting people whose protected characteristics may make them vulnerable, particularly sexuality'.^[8] The letter also makes specific reference to National Institute for Clinical Health guidelines on integrated health and care for people experiencing homelessness.^[9] This guidance provides that when developing services, commissioners should consider providing services and support aimed at the needs of particular groups experiencing homelessness, in a list which includes both young people and LGBT+ people. Drawing on research, it recommends the development of multi-disciplinary teams, noting that

Because people experiencing homelessness have a wide range of health and social care needs, the committee agreed that outreach teams should be multidisciplinary and also equipped to respond to needs of people with different, intersecting experiences relating to, for example, gender, ethnicity and being part of the LGBT+ community.

We would support this approach, and request NICE take account of the research undertaken relating to young LGBTQ+ people experiencing homelessness, and make particular reference to the intersecting vulnerabilities of this group in future iterations of the guidance.

Manchester Integrated Care & Dept of Health and Social Care

Manchester Integrated Care Board also responded to each issue raised by the Coroner. At page 5, their letter refers to a Safeguarding Adult review which acknowledged that 'exploitation was not always recognised by professionals and therefore the Safeguarding Adult procedures were not implemented or considered.' It described work being undertaken to improve provision.

The letter from the Department for Health and Social Care is the shortest response. It flags the importance of including wider determinants of health in integrated care strategies and also refers to the NICE guidelines (quoted above).

5.4 Recommendations from Inquest Analysis

Drawing on this analysis, we recommend that Government should:

- Ensure that it is not only Manchester which reviews and acts to improve its provision relating to young LGBTQ+ people experiencing homeless, including improving the ways in which professionals recognise exploitation.
- Undertake a review of support for young LGBTQ+ people who are homeless to ensure safe accommodation options are available for them.
- Take steps to ensure referrals are taking place, as required by legislation.
- Review guidance to ensure it reflects the particular vulnerability of young LGBTQ+ people who experience homelessness, including guidance on (1) the relationship between children's services and local housing authorities about their duties under Part 3 of the Children Act 1989 and Part 7 of the Housing Act 1996 to secure or provide accommodation for homeless 16 and 17 year old young people, (2) safeguarding in the context of emergency accommodation/night shelters.
- Ensure that those responsible for providing regulation, accreditation and training relating to night shelter provision ensure that their materials specifically refer to the vulnerability of young LGBTQ+ people.

6. Local Authority Approaches

Given the evidence we outlined in our full research report (Tunaker et al 2025), in this separate report we examine a series of case studies of the ways in which local authorities have (or have not) sought to develop support for young LGBTQ+ individuals. As discussed, local authorities have duties to provide advice and assistance to people experiencing homelessness, often provided via their websites, and to produce and publish strategies to seek to reduce homelessness within their local area. Authorities also make a range of potentially relevant policy materials available, and scrutiny of such materials provides insights into the policy approach taken by a local authority. We have used these published materials to analyse the approach of different authorities.

Specific reference to young LGBTQ+ people

Some local authorities are very clear in their commitment to considering the challenges faced by young LGBTQ+ people who are experiencing homelessness and seeking to address their needs.

These included Islington, who specifically identify the over-representation of LGBTQ+ people who experience homelessness in their analysis of homelessness. Their assessment of the risks faced by LGBTQ+ individuals under 26 includes acknowledgment that young LGBTQ+ people are more likely to attempt suicide and self-harm than the rest of the population and they suggest that their existing mediation service to reduce homelessness caused by family and friend exclusion will prove beneficial to young people who identify as LGBTQ+ noting that evidence suggests they are likely to face rejection, abuse or violence. It notes that 17 beds are commissioned for young people who identify as LGBTQ+, and in addition, in public facing information, they provide a range of contacts and links. These include references to Stonewall Housing, London Friend and the Outside Project.

Similarly, Rochdale in their policy documents highlights the need for understanding and support for LGBTQ+ young people. They note that a significant portion of LGBTQ+ young people experience homelessness due to family rejection and abuse related to their LGBTQ+ status. Their analysis acknowledges that LGBTQ+ young people are at a significant risk of homelessness, and there is a specific need to address their circumstances with targeted support and interventions. In this

context, their Homelessness Strategy highlights the importance of understanding the unique challenges faced by LGBTQ+ young people and ensuring that services are accessible and sensitive to their needs, underlining the recognition of their vulnerability and priority need within the context of homelessness services. In developing this work, they have engaged with the akt (as highlighted in these documents).

Other local authorities which explicitly refer to the issues faced by young LGBTQ+ people include Lambeth, who recognise the disproportionate rates of homelessness among young LGBTQ+ individuals, often due to parental rejection and abuse. They have made efforts to address this by work with LGBTQ+ organisations, such as akt, which is included in the House Proud Pledge. The strategy includes plans to work with healthcare, substance misuse services, and employability support to address the unique needs of homeless LGBTQ+ youth. They also highlight the provision of mediation, assessment of housing needs, and support services that cater to LGBTQ+ young people.

Durham's analysis of their local context specifically mentions research by akt, highlighting the significant proportion of homeless young people who are LGBTQ+, indicating a recognition of the unique challenges faced by this community. The strategy acknowledges that LGBTQ+ people, including young people, may be more at risk of homelessness and might have complex needs.

Norwich's strategy included engagement with young people and voluntary sector partners in a Greater Norwich Homelessness Forum, identifying particular priorities for young people. The Strategy notes the need for improved safeguarding for young people, with specialist support for LGBTQ+ youth, including 'mediation for families'.

Finally, some local authorities make specific, but more limited reference to young homeless LGBTQ+ people in their strategic plans, such as Tower Hamlets, who note the increased vulnerability of LGBTQ+ young people to homelessness in the context of running away from home due to their LGBTQ+ identity, as well as the need for tailored interventions for such individuals.

Referral

Islington is one of only two local authorities in our sample which includes public facing referral information relating to organisations who might support young

LGBTQ+ homeless people. The other is Lewisham, which includes the akt as an organisation which can support young LGBTQ+ people in an emergency (it should be noted that Lewisham does not specifically refer to the needs of such individuals in any of the publicly available policy or strategy documents).

Others, such as Rochdale and Lambeth, have clearly evidenced close working relationships with organisations such as the akt, but there is no publicly facing information for young homeless LGBTQ+ people.

A further set – Durham, Norwich & Tower Hamlets – have specifically considered the issues facing young LGBTQ+ people in strategy documents, but there is no evidence of partnership working with organisations which can support such young people or reference to such organisations on publicly facing materials.

Specific reference to LGBTQ+ people

Some local authorities made direct reference to LGBTQ+ people, including acknowledging the risks faced by homeless LGBTQ+ people in their strategy documents, but did not specifically address young homeless LGBTQ+ people in any of their policies or publicly facing materials. These authorities included: Ealing, Lewisham, Manchester, Newham (who emphasise the need to improve understanding of housing and homelessness issues experienced by LGBTQ+ people in their area), North Yorkshire, & Salford.

No evidence of specific support

Finally, in the sample we considered, 9 did not have any specific reference to LGBTQ+ people or LGBTQ+ young people, and did not have any details of referral sources for young homeless LGBTQ+ people. These included Brent, Haringey, Bristol, Gateshead, Margate, Newcastle, Somerset, Tameside, York. In this context, it is important to note the ways in which this focus on policy and publicly available information is only a partial picture of the provision in a local authority, as particularly highlighted by Bristol, who our qualitative research has demonstrated provides particular targeted support for young LGBTQ+ people experiencing homelessness.

The approach in Wales

We also considered the approach of the Welsh Government. Their analysis notes that groups of people at high-risk of homelessness includes "People from the LGBTQ+ community" and young people, although it does not directly mention those who might be in both categories. They also detail a youth homelessness campaign, noting that people who identify as LGBTQ+ are often at risk of homelessness when they first tell their family about their sexuality or gender identity. The campaign aims to educate young people, and those around them, on how to spot the signs of hidden homelessness and where to go to get help.

6.1 Cross Comparison with Poverty and Unemployment

We examined how regional poverty rates (post-housing costs), county-level youth unemployment rates, and local authority housing policies impact the geographical distribution of homelessness among young LGBTQ+ individuals (akt clients data in 2023–2024). Poverty and unemployment are key factors, as financial instability increases the risk of homelessness among young people. Local authority housing policies play a crucial role in determining the extent of attention and support for LGBTQ+ youth. By examining the interaction between policies, poverty, and unemployment, we provide a comprehensive analysis of the structural factors influencing LGBTQ+ youth homelessness.

From figure 1, we found that Local authorities like Tower Hamlets, Islington, and Durham, which provide stronger policy support, report lower proportion of LGBTQ+ young homeless AKT clients compared to areas like Manchester, even though they have similar unemployment rates. From figure 2, we further incorporate the local poverty rate dimension, similar trend emerges that regions like Northwest have higher poverty rates than London, but still demonstrate lower LGBTQ+ youth homeless clients---which may be related to their stronger policy supports.

Overall, we find that economic deprivation such as high unemployment and poverty rates do not necessarily correlate with high LGBTQ+ homelessness if robust policy supports are in place. Thus, a strong, inclusive local policies can be important for addressing homelessness among LGBTQ+ youth, especially in high-poverty areas.

Figure 1: LGBTQ+ Homelessness: Youth Unemployment Rate, and Policy Support by Local Authority

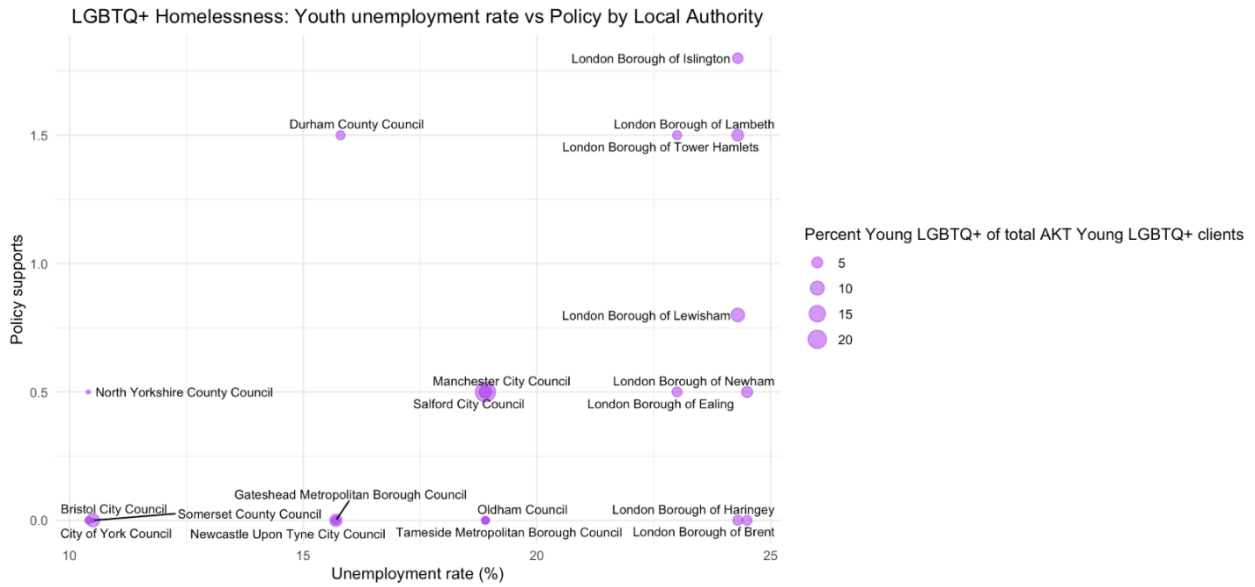
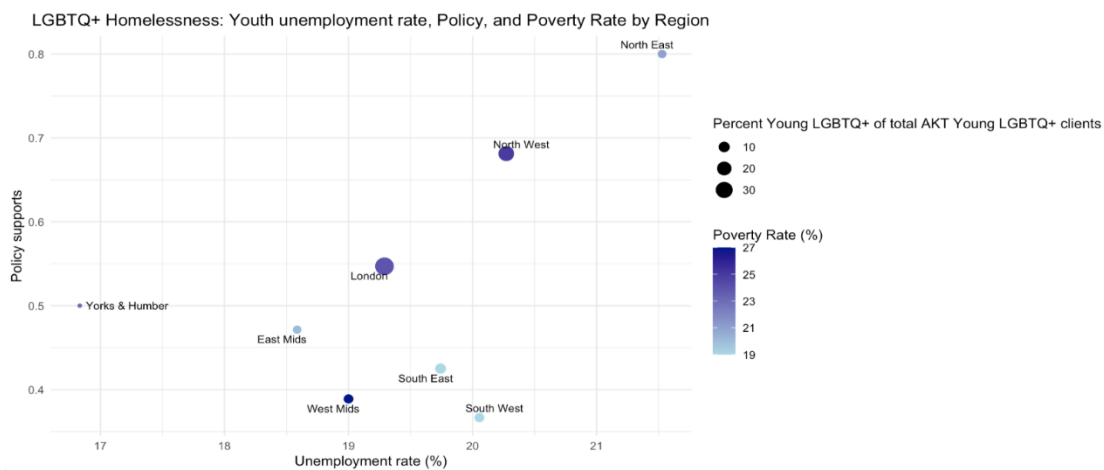


Figure 2: LGBTQ+ Homelessness: Average Youth Unemployment Rate, Average Policy Support, and Poverty Rates by Regions



6.2 Qualitative Evidence

From our qualitative research with young people experiencing LGBTQ+ youth homelessness, and with staff members in voluntary organisation supporting LGBTQ+ homelessness youth, we have had significant evidence to support the need for robust local policies on how to support a young person approaching local authorities as homeless and identifying as LGBTQ+. A large amount of the data collected surmounted to negative experiences, discrimination and a lack of understanding of specific needs. Moreover, we found from our survey with organisations (N=54) that many (41%) felt they did not have appropriate knowledge to support LGBTQ+ people appropriately, and would require training in this area. Many of the young people we talked to had not felt confident to even approach their local authority until they had support from a voluntary specialist organisation such as akt. Part of the reason for this was a lack of visible resources for LGBTQ+ people on the local authority websites and in the physical spaces. These findings resonate with a recent UK wide study on LGBTQ+ homelessness where similarly, participants had not felt safe or confident to ask for support or to apply as homeless to their councils (England and Turnbull 2024). For those who did approach the local authority among our research participants, many reported having issues with officers requesting evidence of domestic abuse, which they could not provide. Consequently a lot of young people did not gain 'priority need' status in their applications. Staff in akt and similar organisations also reported this as a major barrier to LGBTQ+ young people getting support from their local authorities (for further detail, see 'domestic abuse' in the full report). A staff member described the issues as follows:

I think quite often the young people that we're supporting are homeless due to domestic abuse, which is often linked to their identity. And having that recognised as domestic abuse by local authorities can be really difficult. So that we have to deal with a lot of gatekeeping and unlawful decision making or unlawful actions. But we do a lot of challenging and complaints as well and getting solicitors involved. I had say there are certain author authorities that we know are probably better than others, but often I find it just depends on the worker.

Other staff members also raised particular concerns around young people aged 16-17, who fall between the care of housing options and social services. As both services are oversubscribed and thresholds for support from social care are increasingly high, many young people find themselves being encouraged to return home by social services. If social services have deemed a young person safe to return home, housing options are likely to disregard any disclosure of domestic abuse relating to LGBTQ+ identities. As such, a complex range of issues relating to age, sexual orientation, disability, cultural backgrounds, ethnic identities and the lack of joint up working between welfare systems is likely to render young LGBTQ+ people experiencing homelessness, risk of homelessness or housing impermanence less likely to receive adequate support. Many of the young people we spoke to told us about their experiences of constant barriers, long wait times and bureaucratic obstacles they face when trying to get support, as this young person describes:

When I applied, they asked for more details, so I've sent them more details and then a month later after ignoring me, they asked again with the same email for those same details and the same forms to be filled out. So I told my caseworker about it, and then they told me to send them the forms and then they'll forward them to my triage officer. And so now my forms have been sent and go through that with my caseworker helping me this time so they can follow up and make sure everything goes better. Since they did. Just, the council just kind of looked, ignored me for the first time. But once I sent the details, I haven't had anything back yet.

6.3 Policy and Local Authority Recommendations

There is extensive evidence that local authorities could be doing more to consider the needs of young LGBTQ+ people at risk of or experiencing homelessness. We recommend that:

- All local authorities ensure they consider the needs of young LGBTQ+ people in the development of their homelessness, rough sleeping and housing strategies;

- All local authorities should seek to develop working relationships with support organisations;
- All local authorities should provide referral information to support organisations, such as akt, in publicly facing materials such as their websites;
- Local authorities need to exercise caution in the provision of mediation services, given the challenges experienced by young LGBTQ+ people. Such services must be placed in the context of a heightened risk of parental rejection, domestic and sexual abuse, and mental health issues experienced by young LGBTQ+ people;
- Inclusive housing policies for homeless LGBTQ+ youth should be expanded by explicitly including them in policy provisions and offering dedicated support and referral services, particularly in regions with high poverty and unemployment.

7. Collated Recommendations & Conclusion

This report makes the following recommendations:

Policy and Law

1. The Homelessness Code of Guidance should direct that local authorities liaise with police 'LGBT liaison officers' when seeking information relating to an LGBTQ+ individual.
2. The Homelessness Code of Guidance should emphasise the importance of the contextual consideration of intersecting protected characteristics.
3. Section 179(2) should be amended to specifically include young LGBTQ+ people as a group who must be considered when designing advisory services.
4. Central Government should review guidance to ensure it reflects the particular vulnerability of young LGBTQ+ people who are homeless, including guidance on (1) the relationship between children's services and local housing authorities about their duties under Part 3 of the Children Act 1989 and Part 7 of the Housing Act 1996 to secure or provide accommodation for homeless 16 and 17 year old young people, (2) safeguarding in the context of emergency accommodation/night shelters.

Local Authorities

1. All local authorities should ensure that there is liaison with police 'LGBT liaison officers' where seeking information relating to a homelessness application.
2. All local authorities should consider the potential intersecting protected characteristics of young LGBTQ+ people, including the risk of discrimination when placed in a private sector tenancy.
3. All local authorities ensure they consider the particular needs of young LGBTQ+ people in the development of their homelessness, rough sleeping and housing strategies;
4. All local authorities should seek to develop working relationships with support organisations;

5. All local authorities should provide referral information to support organisations, such as akt, in publicly facing materials such as their websites;
6. Local authorities need to exercise caution in the provision of mediation services, given the particular challenges experienced by young LGBTQ+ people. Such services must be placed in the context of a heightened risk of parental rejection, domestic and sexual abuse, and mental health issues experienced by young LGBTQ+ people.
7. Local authorities should expand inclusive housing policies for homeless LGBTQ+ youth by explicitly including them in policy provisions and offering dedicated support and referral services, particularly in regions with high poverty and unemployment.

Central Government

1. Central Government should ensure that it is not only Manchester which reviews its provision relating to young LGBTQ+ people who are homeless and acts to improve, including improving the ways in which professionals recognise exploitation.
2. Central Government should undertake a review of support for young LGBTQ+ people who are homeless to ensure safe accommodation options are available for them.
3. Central Government and local government should take steps to ensure referrals are taking place, as required by legislation.
4. Central Government should ensure that those responsible for providing regulation, accreditation and training relating to night shelter provision ensure that their materials take particular account of the vulnerability of young LGBTQ+ people.
5. Central Government should provide targeted and specific funding to provide LGBTQ+ specific services for LGBTQ+ people experiencing homelessness, such as shelters, supported accommodation and safe houses.

Conclusion

In a context of intense pressure on public services, with competing legitimate requests for support, it is understandable that policy makers might feel it is almost impossible to choose where to place resources to support individuals and communities in need. Given that context, the objective of this report is not to shame, but rather to highlight instances of excellence, and those small changes which might make a significant difference to individuals facing extremely significant challenges. Our review has identified examples of excellence, and areas where positive work to support young LGBTQ+ people is emerging, and we suggest these provide a route map for others. We have also identified changes which might be made to national policy which we suggest would support positive improvements in this area, and we hope that these proposals will be carefully considered by policy makers – to ensure that as much is done as possible to support young LGBTQ+ people at risk of homelessness.

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<https://doi.org/10.1016/j.geoforum.2013.02.01>

Footnotes relating to Part 2: Methodology & Research Questions

^[1] See Kirton-Darling E & Carr H, Homeless Veterans in London: Investigating Housing Responsibilities, Research Findings December 2016, available at <https://kar.kent.ac.uk/69057/1/Homeless-Veterans-in-London-Investigating-Housing-Responsibilities.pdf>

^[2] Note that three additional cases did emerge from the search. One of these, *Baiyelo v. Southwark* [2014] EWCA Civ 780, is an employment law case in which homelessness is mentioned in the facts but is not at issue, and two other cases were identified with the search term 'trans' but did not relate to the research questions.

Footnotes relating to Part 4: The Legal Context

^[1] The report and responses are available here: <https://www.judiciary.uk/prevention-of-future-death-reports/tobias-mannering-jones-prevention-of-future-deaths-report/>

^[2] According to a Manchester Evening News report, <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/kind-caring-teen-found-dead-26486241>

^[3] Section 213B of the Housing Act 1996, as inserted by s.10 Homelessness Reduction Act 2017 and see guidance: <https://www.gov.uk/government/publications/homelessness-duty-to-refer/a-guide-to-the-duty-to-refer#public-authorities>

^[4] Available here: <https://www.gov.uk/government/publications/provision-of-accommodation-for-16-and-17-year-olds-who-may-be-homeless-and-or-require-accommodation>

^[5] <https://www.gov.uk/guidance/operating-principles-for-night-shelters>

^[6] <https://housingjustice.org.uk/night-shelters/quality-assessment-framework>

^[7] Available here: <https://www.local.gov.uk/publications/adult-safeguarding-and-homelessness-briefing-positive-practice>

^[8] The relevant materials provided by Homeless Link are here:

<https://homeless.org.uk/knowledge-hub/supporting-lgbtqi-people/>

^[9] Available here: <https://www.nice.org.uk/guidance/ng214>