

# Policy Training Learning Handbook

Virtual Policy Training for Supported Accommodation Providers

This resource has been prepared and produced by the National Children's Bureau, the provider of the Department for Education funded Sector Awareness and Provider Preparedness programme, based on the information published directly by <u>Department of Education</u> and <u>Ofsted</u>. It is highly recommended that you refer to The Department of Education and Ofsted's most up-to-date guidance to support the application and registration process.



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### Introduction

The National Children's Bureau (NCB) has been appointed by the Department of Education to develop practical support, information, and resources as part of the Sector Awareness and Provider Preparedness programme for Supported Accommodation.

This learning log covers the key policies in relation to the new quality standards, registration, and regulation regime for supported accommodation for young people aged 16 and 17 who are in or leaving care. It is the accompanying guide for a series of virtual training sessions run by the National Children's Bureau in July 2023 for supported accommodation providers.

This guide aims to summarise the key criteria for each policy required for registration with Ofsted in a simple, accessible way. It also references the important statutory and non-statutory guidance and legal frameworks to support you in developing these policies.

Throughout this guide, you will find space to write notes. You can use this space to keep track of your learning throughout the virtual training session.

This content has been carefully curated by NCB in alignment with the information published directly by the Department of Education and Ofsted.

Please note that while this content strives to be comprehensive, it should not be considered a substitute for official publications about the regulations from the Department of Education and Ofsted. It is highly recommended that you refer to The Department of Education and Ofsted's most up-to-date guidance to support the application and registration process.

# **Aims of Policy Training**

To support providers of Supported Accommodation with the development of key policies required by the Quality Standards with a focus on the Statement of Purpose, Safeguarding, Behaviour Management and Missing Child Policies, and Young People's Case Records.

# **Learning Objectives**

- Providers of supported accommodation to have increased understanding of the requirements of the key policies set out in the Regulations and Quality Standards.
- Providers of supported accommodation to have increased awareness of the legal framework underpinning the policies and other related statutory and non-statutory guidance.
- Providers to have increased confidence in developing their own policies and documents.
- Providers have increased understanding of how these policies can be put into practice by exploring a range of scenarios relating to young people living in supported accommodation.



### Legal Framework and Guidance

Here you can find links to the important legal framework and statutory guidance that will be referenced throughout the virtual policy training.

There will also be links to specific guidance for individual policies later in the guide.

### **Legal Framework**

- The Supported Accommodation (England) Regulations 2023
- Children Act 1989 & Children Act 2004
- Care Standards Act 2000 (Section 23)

### Statutory/non-Statutory Guidance

- Guide to the Supported Accommodation Regulations including Quality Standards 2023
- Working Together to Safeguard Children 2018
- <u>Information Sharing 2018</u>
- Guidance on Children Who Run Away from Home or Go Missing 2014
- National Protocol on Reducing Unnecessary Criminalisation of Looked-after Children and Care Leavers 2018



### **Protection Standard**

### Overview of Protection Standard

The protection standard covers the roles, responsibilities and processes that supported accommodation providers must have in place to ensure young people are protected from harm, have their needs met and to feel and keep themselves safe.

This relates to implementing effective child protection policies that are regularly reviewed and working closely and collaboratively with the accommodating authority and other agencies and professionals to manage and minimise risk of harm to young people.

The protection standard also outlines how supported accommodation providers form part of the wider, national responsibilities of local authorities as set out in statutory guidance.

The protection standard requires supported accommodation providers to ensure staff have the skills to identify potential risk of harm and that the policies support staff to act decisively and understand their role and responsibilities when it comes to keeping young people safe.

### **Safeguarding Policy**

This is covered within the NCB's virtual policy training sessions.

### Relevant legislation and guidance

- o Children Act 1989: Care Planning, placement and case review
- o Children Act 1989: Planning transition to adulthood for care leavers
- o <u>Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers.</u>
- o The Francis Review: Freedom to Speak Up

### **Key points**

#### This policy must:

- Set out the procedure to be followed in the event of an allegation of abuse/neglect.
- Provide for liaison and cooperation with any local authority which is, or may be, making a child protection enquiry in relation to a child accommodated by the supported accommodation.
- Provide for the prompt referral of an allegation about current or ongoing abuse or neglect in relation to a child to the accommodating authority and, if different, the local authority in whose area the premises in which the child is accommodated are located.
- Provide for the prompt referral of an allegation about past abuse or neglect in relation
  to a child to the accommodating authority and, if different, the local authority in whose
  area the alleged abuse or neglect occurred.



- Provide for records to be kept of an allegation of abuse or neglect, and the action taken in response.
- Describe the measures which may be necessary to protect children following an allegation of abuse or neglect.
- Describe how and to whom staff are to report, without delay, any concern about abuse or neglect of a child.

### **Missing Child Policy**

This is covered within the NCB's virtual policy training sessions.

### Relevant legislation and guidance

- o Relevant local authority protocols on Missing Young People
- o College of Policing Guidance on the management, recording, and investigation of missing persons.

### **Key points**

The policy must outline:

- o the steps taken, and to be taken, to prevent children accommodated by the supported accommodation undertaking from going missing, and,
- the procedures to be followed, and the roles and responsibilities of persons working for the supported accommodation undertaking, in relation to a child who is, or has previously been, missing.



### **Behaviour Management Policy**

This is covered within the NCB's virtual policy training sessions.

### Relevant legislation and guidance

 National Protocol on Reducing Unnecessary Criminalisation of Looked-After-Children and Care Leavers

### **Key points**

The policy must set out:

- the approach to supporting children to maintain a reasonable standard of behaviour that reduces the risk of harm to, and supports the welfare and protection of, children and other individuals.
- the expectations of children in relation to their behaviour, what will happen if those expectations are not met, and how the registered person will ensure that children know what those behaviour expectations are.
- how appropriate behaviour is to be promoted in the premises providing supported accommodation.
- how the registered person will deal with challenging behaviour, including methods of de-escalation, and taking a proportionate approach to involving other authorities.
- how the registered person will promote the development of positive and respectful relationships between children who are accommodated by the supported accommodation undertaking and staff.
- the measures of restraint which may be used exceptionally in relation to children in the supported accommodation, bearing in mind that restraint of a child is only permitted for the purpose of preventing injury to any person, including the child, or serious damage to the property of any person, including the property of the child and that restraint of a child must be necessary and proportionate.
- where there is use of a measure of restraint of a child in premises used for supported accommodation, the registered person must ensure that appropriate records are kept.



### **Protection Scenarios**

### **Scenario 1: Safeguarding**

Claire is 16 and moved into your supported accommodation setting 8 weeks ago.

She is considered a looked after child, having been removed from her mother's care when she was 9 years old due to serious concerns about neglect.

She was previously living in a foster placement in a family-based setting, but the foster carers struggled to balance Claire's need for independence with the rules of the home.

Claire is excited to have more independence and is well-liked by staff by staff in the setting. Her keyworker, Stephen, has been supporting her to start a course at the local college and accompanied her on the bus on the first day she attended.

A staff member comes to you to let you know that Claire's key worker, Stephen, has been buying vapes for Claire and that this has been happening since she moved in.

When you ask Stephen about this, he strongly denies having bought Claire any vapes and tells you that he buys them for himself, but that Claire has stolen these from his coat pocket.

Later, you see Claire and Stephen sat in the garden outside the setting. They appear to be deep in conversation and are sat closely together. Another young person mentions that Claire hasn't been into college recently but has still been taking the bus each morning.

- o What should your next steps be with this information?
- o What individual vulnerabilities does Claire have?
- o How can you effectively safeguard Claire?
- o Which policies would you need to look at, and what should they say?
- o How would you involve other professionals, including Claire's social worker?



# Scenario 2: Missing Child

Ryan is 17 and has been living in your supported accommodation service for just over a year.

He is a looked after child, having been removed from his father's care at the age of 11 after being found by the police in a town 50 miles away with a large quantity of drugs in his possession. There were serious concerns that Ryan was being groomed by a gang in the local area and that Ryan's father was facilitating his involvement in county lines.

Until Ryan was 16, he lived in a small residential placement outside of local authority boundaries and saw his family twice a month. Your supported accommodation service is closer to the town where Ryan grew up and he has started recently having unsupervised family time (contact) on a weekly basis, supported by his social worker.

On the three previous family time sessions, Ryan has arrived home several hours later than planned and smelling strongly of cannabis. Staff are not able to reach him on the phone during this time. You send an email to Ryan's social worker highlighting that you are worried and asking to speak to her, but you receive an out of office response.

The following week, Ryan does not return to the setting at all after family time and has been uncontactable for around 10 hours. You look in his room to see if there is anything to help you locate him and find used train tickets to different towns outside the local authority boundaries. Ryan does not have any links to these places and has never visited them before.

- o What should your plan of action be at the point Ryan goes missing?
- o Which other agencies do you need to involve?
- o How can you manage the risk of Ryan going missing again in future?
- o What policies would you need to look at in this scenario?
- o Can you think of any statutory guidance that you should refer to?



### Scenario 3: Behaviour Management

Sammi is 16 and has been living in your supported accommodation setting for 6 months.

She previously lived with her grandmother, however there were concerns after the police were called on numerous occasions to violent arguments between them. Sammi was subsequently accommodated by the local authority under Section 20.

Sammi has been diagnosed with ADHD and struggles to regulate her behaviour. She has experienced a number of traumatic events, including her mother's suicide and periods of bullying at school. She does not believe she has ADHD and often refuses the medication she has been prescribed to help her with this.

While she has mostly good relationships with the staff in the setting, there have been occasions where Sammi has become very frustrated in conversations about her medication and has shouted and used abusive language towards staff.

Your staff have been trained in conflict management and resolution and this approach has worked well with Sammi so far as they have been able to de-escalate these situations.

However, there was an incident more recently in which Sammi punched a notice board in frustration, causing glass to shatter and cutting herself and a member of staff. You are worried about what will happen if Sammi behaves in this way in future.

- o What action should you take following this most recent incident?
- How might you safeguard Sammi and your staff if this were to happen again, ensuring your response is proportionate and measured?
- How might you use your Behaviour Management policy to set out what appropriate behaviour looks like, to support Sammi and set clear boundaries?
- o How should you involve other agencies, including the police?







# **Leadership and Management Standard**

### Overview of Leadership and Management Standard

This standard outlines the key responsibilities and accountabilities of the registered person in terms of service delivery, business continuity, and staffing and recruitment management.

The registered service manager and those involved in the day to day running of settings, including the staff and any leadership team for the service, will play a key role in enabling the registered person to fulfil the requirements of this standard.

The standard highlights that the registered person should enable, inspire, and lead a culture that puts young people first and prioritises their wellbeing and development. Part of this is ensuring that young people know what they are entitled to from the provision as well as their entitlements in education and from the local authority, as looked after children/care leavers.

Recruitment and staffing a key area in this standard – ensuring that staff have the right qualifications, experience and skills, and that they have the tools through supervision, training and development to support young people, and do their job well.

### **Statement of Purpose**

This is covered within the NCB's virtual policy training sessions.

### **Key points**

This policy must set out:

- the purpose of the supported accommodation: ethos, core aims and function.
- the category or categories of supported accommodation it offers.
- the services it provides for children it accommodates and supports.
- the characteristics of the children the supported accommodation undertaking will provide accommodation and support to, including age range, number, and sex.
- the facilities it provides to the children it accommodates.
- a description of the accommodation it provides, including how the accommodation meets the accommodation standard and how it could be adapted to meet the individual needs of children.
- the address of the registered provider's principal office, except where this is the same address as where the children are accommodated.
- the organisational structure, including management structure and staffing arrangements.
- how it ensures that the child's rights and views are at the centre of the support, service delivery and planning.



- the arrangements in place to ensure a child is fully aware of their entitlements throughout the duration of their placement in supported accommodation.
- the positive outcomes the service seeks to achieve for children and its approach to achieving those outcomes.
- the arrangements in place to support the development of children's independent living skills, in line with their identified individual needs.
- the arrangements in place to promote children's involvement and progress in education, training or employment.
- the arrangements for and policies on protecting and promoting the mental and physical health needs of children, including medication handling, recording and safekeeping.
- anti-discriminatory practices in respect of children and their families.
- how it supports the cultural, linguistic and religious needs of children.
- details of who to contact if a person has a complaint and how that person can access the complaints policy (see complaints procedure).
- details of how a person involved in the support or protection of a child can access the supported accommodation undertaking's child protection policies.

### Young People's Case Records

This is covered within the NCB's virtual policy training sessions.

### Relevant legislation and guidance

- o Local safeguarding partner policy and procedures
- o Information Sharing Advice for Safeguarding Practitioners 2018
- Data Protection Act 2018

### **Key points**

- All young people's case records must be kept up to date and stored securely whilst they remain in the setting.
- They must be kept up-to-date and signed and dated by the author of each entry.
- Young people's case records must be kept for 75 years from the date of birth of the child, or if the child dies before the age of 18, for 15 years from the date of their death.
- Staff should be familiar with the supported accommodation provider's policies on record keeping and information (as specified by safeguarding partners for the area where the supported accommodation setting is located) and understand the importance of careful, objective, and clear recording.





- Staff should record information on individual young people in a way that does not stigmatise and distinguishes between fact, opinion and third-party information.
- Information must always be recorded in a way that will be helpful to the young person.
- Young people should be encouraged to reflect on and understand their history and be supported by staff on how to access, read and add to their records.
- They should be regularly reminded of their rights to see information kept about them and be given information about how to access their records in later life.
- If a supported accommodation setting closes or is taken over, it is important that young person's case records continue to be stored securely for the required period of time so that young people can access their case records in later life.

The Regulations outline that supported accommodation providers have responsibilities regarding notifications of serious events. This includes notifying:

- Ofsted
- the accommodating local authority
- the Secretary of State
- the local authority in whose area the premises used as supported accommodation are located (if that local authority is not the accommodating authority)
- the integrated care board
- any other relevant person.

The registered person must notify Ofsted and any relevant person without delay if:

- A child is involved in or subject to, or is suspected of being involved in or subject to, sexual exploitation or child criminal exploitation.
- An incident requiring police involvement occurs in relation to a child and the registered person considers that incident to be serious.
- There is an allegation of abuse against the supported accommodation undertaking or a person working for it.
- A child protection enquiry is instigated, or concludes (and the outcome).
- There is an incident involving the use of a measure of restraint of a child.
- There is any other incident relating to a child which the registered person considers to be serious.





### **Workforce Plan**

### **Key points**

This policy must cover:

- the management and staffing structure,
- the experience and qualifications of staff & managers, and any further training required,
- the processes and timescales for staff to complete induction, probation and core training, including in safeguarding and health and safety,
- o the process for managing and addressing poor performance,
- o the process and timescales for supervision and monitoring of staff.

### **Contingency Plan**

### **Key points**

- Sets out what would happen to the young people accommodated at the undertaking/premises in the event of the undertaking ceasing to provide accommodation (either temporarily or permanently).
- Set out the measures that would be undertaken to ensure the appropriate transfer of records.
- Sets out how disruption to young people's lives will be kept to a minimum and how young people will be kept informed of what is happening and why and how consistency will be ensured throughout.

# **Equalities Policy**

### Relevant legislation and guidance

o Equality Act 2010

### **Key points**

This policy must set out how the service intends to value individuals, combat discrimination and safeguard those who may face inequality or harassment due to one or more of the characteristics protected under the Equality Act 2010.

This is for young people who live in the setting but also for staff, e.g., equality in employment, recruitment and selection, and disability discrimination.



# **Leadership and Management Scenarios**

### **Scenario 1: Statement of Purpose**

You run a small supported accommodation service. Your setting consists of two homes, each with two looked after children aged 16-17 living there.

A local authority, who has already placed young people in your setting, informs you that they will have a number of unaccompanied asylum-seeking children (UASC) needing placements. These young people have very limited English language skills.

This is the first time you have had UASC placed in your setting.

The local authority asks to see your Statement of Purpose to consider whether your setting can meet the needs of these new young people.

- How you may need to adapt your supported accommodation service (and your Statement of Purpose) to meet the needs of these young people, as UASC.
- o Which of the other areas of your setting you may need to adapt, for example:
  - staffing and workforce
  - your setting's young person's guide and any other accessible information
  - arrangements to support independent living skills
  - arrangements to support progress in education, employment & training.
- o How you will ensure the young people are fully aware of their entitlements throughout the duration of their placement, and what these entitlements are.
- o Who the audience for your Statement of Purpose is.



### **Scenario 2: Keeping Case Records**

Kiran is 17 and lives in a self-contained flat as part of a supported accommodation setting. She is a care-leaver, having been accommodated by the local authority when she was 12 after concerns were raised about Kiran's mother's mental health.

Kiran became pregnant when she was 16 and now has a 1-year-old son, Leo, who also lives with her. She has significant mental health needs and experiences depression, anxiety, and panic attacks, which are linked to the trauma she experienced growing up. Consequently, Leo and Kiran are supported by the local authority under a Child in Need plan (Section 17).

Kiran's support workers, who visit daily, make you aware through their visit reports that Kiran has been regularly self-harming through cutting her legs. The staff are disturbed by some of the graphic scenes they have seen, and the language they use in their reports reflects this.

When you speak to Kiran about the self-ham, she asks to read the reports that staff have written. She also asks that you do not share this information with Leo's social worker.

- o How can you ensure the records kept are objective and do not stigmatise Kiran?
- o How could Kiran be encouraged to be involved with records about her and Leo?
- Which policies would you look at to make a decision about whether to inform Leo's social worker about the self-harm and Kiran's mental health needs?
- o Which legal framework or statutory guidance should inform your record-keeping?







# **Support Standard**

### **Overview of Support Standard**

The support standard covers how providers ensure that young people receive individual and tailored support that meets their needs, from when they are first referred to live in the service up until they transition from supported accommodation to live more independently.

Providers should also ensure that there is a plan to support the child to develop resilience and skills to make the transition into more independent living.

It is key that young people take a lead role in determining what this looks like and where this support comes from, whether this is the accommodation provider, the accommodating authority, or other organisations or community services.

The provider should work collaboratively with the accommodating local authority to agree a plan of support and ensure that this is reviewed regularly. The accommodating authority must be notified if there are concerns, or if support needs have changed.

### **Complaints Procedure**

### Relevant legislation and guidance

- o The Children's Commissioner's Help at Hand Service
- o Get it Sorted (2004) Guidance on providing effective advocacy services for children and young people making a complaint under the Children Act 1989.
- o <u>Independent Reviewing Officers' Handbook</u>

### **Key points**

- The Complaints Procedure must outline how the provider will consider complaints made by or on behalf of young people.
- The procedure must ensure that no person who is the subject of a complaint takes any part in its consideration or investigation, except at the informal resolution stage if the registered person considers it appropriate.
- The procedure should outline how the registered person will ensure that a record is made of any complaint, the action taken in response, and the outcome of any investigation.
- The registered person must ensure that no child is subject to any reprisal for making a complaint or representation.



### **Quality of Support Review**

### **Key Points**

The review must focus on:

- the quality of support provided by the service,
- the experiences of young people living in the each of the provider's settings,
- the impact the support is having on outcomes and improvements.

The review must be robust and must consider feedback and evidence from all settings under the provider's registration. The whole review process and the resulting report should be used as a tool for continuous improvement of the service.

The registered person is responsible for deciding what each review should focus on, based on the specific circumstances of the service at that particular time and any areas of high risk to the young people in the service, considering any settings that are designed or tailored to support a cohort with specific needs.

The registered person will also consider what information or data recorded in the settings will form part of the evidence base for their analysis and conclusions.

The review should enable the registered person to:

- identify areas of strength and possible weakness in the service's support,
- clearly identify any actions required for the next 6 months of delivery,
- including any specific actions to individual settings if appropriate, and how those actions will be addressed.





### **Accommodation Standard**

### Overview of the Accommodation Standard

The accommodation standard outlines what young people living in supported accommodation settings should expect from their living environment, including:

- Stability and consistency.
- Consistent and continuous access local services, including education and healthcare.
- Sense of belonging within the local community and promotion of positive self-esteem.
- Furnished and designed for each child individually and all children collectively.
- Accessible, safe, secure, and well-maintained.
- Designed, furnished, and maintained to remove avoidable hazards or possible health and safety risks, complying with all health and safety and fire legislation.
- Positive, comfortable, and nurturing a welcoming and homely space.
- A bedroom that Is sufficiently sized, equipped to their individual needs and has telephone or internet connectivity so that young people can stay connected.
- Provision of basic items such as bedding, towels, kitchen equipment and personal hygiene products (if a child does not have access to such items).
- Respect for their privacy and their own personal, physically secure space.

# Young Person's Guide

### Relevant legislation and guidance

- o <u>Promoting the education of looked-after children and previously looked-after children</u>
- o Participation of young people: education, employment and training
- o Care leaver covenant
- o Keep on Caring: Supporting Young People from Care to Independence
- Protection of Freedoms Act 2012 and the Surveillance Camera Code of Conduct (Home Office 2013)

### **Key points**

The young person's guide must be:

- o made available to all young people in a format that is easily accessible.
- o understood by each young person before or when they arrive at the setting.
- outline important details about the service such as staff rotation and how they can be in touch with staff, and what the young person can expect from the service.



- o provided in a format that is easily accessed and understood by each young person, taking into account the particular needs and requirements of the young person.
- o include information on the location of the setting including access to local amenities such as shops, transport routes, proximity to local colleges, facilities.
- o make reference to how the setting meets the accommodation standard.
- o include information on any processes or rules to keep the young people you accommodate safe, such as the use of CCTV in or outside the premises.

The young person's guide should help young people to understand:

- o the Statement of Purpose and what the day-to-day routine looks like.
- o what support the young person is entitled to through the service in a variety of areas such as education, training, employment, developing independent living skills, and how the young person can access the support, including for their physical and mental health.
- o expectations around behaviour and engaging with the service, such as good housekeeping, treating others with respect, and so on.
- o policies and agreements around the use of drugs and alcohol.
- o arrangements in place for staff entering young people's bedrooms, such as providing advance notice and when this might not be possible.
- how the young person can make a complaint in line with the service's complaints procedure.
- how the young person can access advocacy support or independent advocacy if eligible; and how the young person can contact the Office of the Children's Commissioner.

### **Location Assessment**

### **Key Points**

The location assessment should be completed at least annually and should inform decisions to accommodate a young person based on the extent to which it can meet their individual needs. This includes factors such as:

- the safety of young people, including any safeguarding concerns,
- wellbeing and personal development,
- o social, educational, employment and training needs.

