

## NCB's analysis of Supported Accommodation

Further to the recent publication of the Department for Education's [Guide](#) to the Supported Accommodation Regulations including Quality Standards', alongside the Government response to the consultation, NCB have analysed the opportunities and challenges in the new approach to regulating supported accommodation for young people aged 16 and 17 who are in or leaving care.

For too long now, over a third of the 16- and 17-year-old young people in the care system have been subject to decisions made to place them in variable quality, unregulated independent and semi-independent settings, in some cases with devastating outcomes. The recent media coverage of the findings of the inquest jury in relation to the tragic death of an 18-year-old living in one of these settings highlighted the significant issues across the decision-making and placement pathways including inaccurate information sharing both within the local authority and between the local authority and the provider.

Examples like this demonstrate not only the need to take urgent action to regulate supported accommodation but also to ensure that the issues across the system of care and support for looked after young people are addressed.

NCB believes there is an urgent need to address the current situation for young people living in these settings where they are not safe or where their needs have not been fully considered in placement decisions.

That is why we are working with local authorities and providers in the sector to ensure that there is a sufficient balance between improving outcomes for young people and improving the quality of settings, without overburdening an already struggling system. We believe that incremental change is the only realistic path to the longer-term step-change in the standards and expectations for this group of young people. There are real risks in trying to move too far, too fast – we could seriously harm a market that is already struggling and thereby make longer-term improvement in outcomes much harder. Instead, it makes sense to focus on critical quality improvements now to lay the groundwork for shared standards of care across all types of provision.

### The wider system of care and support

When looking at the experiences of, and outcomes for, young people it is critical to understand the wider context of the whole system that is intended to care for and support them. The Independent review of children's social care highlights a number of systemic challenges that impact on the lives and experiences of young people, putting them at greater risk of extra-familial harm as well as greater risk of entering the care system:

"Many of the problems which lead teenagers facing extra familial harms to be unable to stay safely with their families, are common to all of children's social care: inadequate help and support when issues start; poor multi-agency working; not enough consideration of wider family networks to stop children entering care; and social workers without enough experience, knowledge, skills and support."

NCB sees a critical role for the systems of care and support for young people in and leaving the care system, not only to ensure sufficient provision is available to meet needs for care and support and to keep young people safe, but also to effectively prepare young people for fulfilling adult lives. However, this journey does not start at 16, but as early as possible as it should for all young people regardless of their circumstances.

This means that the whole system of support from the point at which a child or young person comes into care should have a shared understanding of and commitment to delivering the type of care and support that enables young people to thrive into adulthood.

## **What does the Guide say?**

The 'Guide to the Supported Accommodation Regulations including Quality Standards' acknowledges that in order to make effective and appropriate placement decisions based on individual needs local authorities will need to consider sufficiency across the foster care, children's home and supported accommodation landscape to ensure the needs of young people can be met appropriately.

"In discharging their statutory duties, including sufficiency planning, local authorities must make placements that best meet the needs of the individual child and ensure there is sufficient accommodation to meet the needs of their looked after children and care leavers."

The Guide is clear that supported accommodation should not be seen as the default choice for 16- and 17-year-olds, reflecting the expectation, set out in 'The Children Act 1989 guidance and regulations - Volume 2: care planning, placement and case review', that local authorities make appropriate decisions based on a thorough assessment of needs. In practice, this means that where young people aged 16 and 17 have needs that would be best met in foster care or in a children's home that is where they should be living.

In the context of the existing landscape, we know that some groups of vulnerable young people are disproportionately represented in currently unregulated independent and semi-independent settings. For example, unaccompanied asylum-seeking children (UASC) make up 42% and 45% respectively, compared to 23% of CLA population aged 16 & 17. There is also evidence of disabled young people being placed in these settings although not to the same extent (7% in independent living and 8% in semi-independent living).

The Guide seeks to provide clarity on the young people that could be supported in high quality supported accommodation under the new regime, but also the young people who would not be expected to be living in these types of accommodation.

"Where a young person has complex needs and/or requires a greater level of ongoing care and supervision, we do not expect that supported accommodation would be appropriate. However, supported accommodation should be flexible enough to accommodate temporary increases in support for young people who would otherwise manage well in this type of provision, enabling placement stability where appropriate."

## What are the opportunities?

The [Ofsted registration process](#) creates a robust initial approach, including visits to settings and conversations with young people, which is critical in driving up standards in supported accommodation. Whilst there are concerns over the longer-term timelines and Provider level inspection model, we think that the registration approach is an important step. It will address the urgent requirement to understand and implement the expectations of both DfE and Ofsted in terms of the quality that young people should be able to consistently expect in their homes.

Furthermore, [Stable Homes, Built on Love](#) sets out the range of action that the Government intends to take in relation to improving outcomes for young people, some of which are particularly relevant to improving outcomes for young people living in supported accommodation:

- The Tackling Child Exploitation Support Programme which was funded to develop multi-agency practice principles for local partnerships when tackling harms outside the home. These principles will be available in Spring 2023.
- Providing funding to four local authorities to pilot an alternative child protection pathway for risk outside the home. Using the learning from these projects and from the Families First for Children Pathfinder to update child protection processes in statutory guidance Working Together to Safeguard Children, and support front-line staff in keeping teenagers safe.
- Recruiting more foster carers who will be able to provide homes for older children and young people, such as teenagers and Unaccompanied Asylum Seeking Children (UASC). UASC are often older with only 13% being under the age of 16.
- Undertaking a number of reforms for children in care and care leavers that will target teenagers, including an extension of post-16 Pupil Premium Plus (PP+) style funding, supporting care leavers into employment including apprenticeships and an uplift to the leaving care allowance.

We welcome this cross-system scrutiny and drive for improvement as well as the acknowledgement that all children and young people in care need a trusted adult they can turn to and the Government's commitment to:

"...provide over £30 million in the next two years to significantly increase the number of local authorities with family finding, befriending and mentoring programmes including Lifelong Links. These programmes help children in care and care leavers to identify and connect with the important people in their lives and create new relationships."

## What are the challenges?

Due to the scale of transformation necessary across the social care system, a complex and interdependent landscape of implementation and improvement programmes will be running in parallel. There will need to be well coordinated approaches to facilitating learning across

the system to accelerate change for young people in supported accommodation and avoid conflicting and misaligned 'solutions'.

Whilst the key principles and new Quality Standards are an important next step in improving a series of critical issues in supported accommodation provision, it will be a challenge to implement these changes at pace in a sector where one of the key issues is variable quality. For some providers this will likely require a more significant shift than others – this is almost inevitable in a landscape with over 1,100 providers and more than 3,000 settings, that we know of.

The workforce development necessary to equip staff across this landscape with the skills, knowledge, and understanding that is required to deliver some elements of the standards could be a significant and time-consuming process. This will need to be well managed to achieve the registration timelines and avoid leaving young people in unlawful settings or with their lives further disrupted by moves into an alternative, registered supported accommodation provision. Providers and local authorities will also need to be alert to the particular needs of UASC, young people experiencing homelessness, and those in the youth justice system.

The nuance in providing support in caring environments will need to be well articulated and understood as a spectrum from support through to care as set out in the Guide and this will need to be an integral part of the way in which Ofsted carries out both registration and inspection to avoid unintended perverse incentives which may lead to providers exiting the sector:

"'Care', insofar as it describes a service, is delivered in children's homes and 'support' is delivered in supported accommodation, however everybody delivering supported accommodation should care about young people and create a caring environment. Even though the service provided in supported accommodation is called 'support', this provision remains an important part of the children's social care system. As such, supported accommodation is part of the continuum of care and support for looked after children and care leavers as they grow up, and are ready for increased independence on the path to adulthood."

## **The Sector Awareness and Provider Preparedness programme**

NCB intends to use the opportunity of the [Sector Awareness and Provider Preparedness programme](#) to share insights and learning, gathered through the sector intelligence elements of the programme and the extensive activities planned to support Providers to prepare for registration. We will be able to identify where registration and adherence to the standards is improving experiences of young people and where the gaps in the system remain – and use this learning to inform both the wider social care change programme and the next steps in relation to the review of Care Standards.