



# Five-Star Interim Report

January 2020

Thames Path



**Over the past year, the media has exposed horrifying examples of children and young people in the care system being placed in entirely inappropriate settings – in caravans, tents, B&Bs and even in canal boats.**

**These young people have had the toughest starts in life. They don't need one-star accommodation, they need a safe place to call home, and a warm welcome from those that can offer them the stability, love and care that they need to flourish.**

**It's time to offer every child and young person truly five-star care.**

*Dr Krish Kandiah, Founding Director of Home for Good*



# Introduction

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In recent months, alarming reports and media stories have been released, exposing the poor-quality accommodation and inadequate support given to children in England's care system. Individual stories have been truly shocking and include a fourteen-year-old child placed on a canal-boat 200 miles away from home. While instances like this are thankfully rare, just one instance is one too many. Furthermore, it has become apparent that the nature and scale of this issue is not well-understood and the steps that could be taken to rectify the issues are therefore unclear. This report explores some of the key issues and makes some suggested next steps for the new Government and wider civil society.

As the issues of inappropriate accommodation and inadequate care have begun to be exposed, other reports have raised concerns about the link between the rise in this type of accommodation and increases in the number of children **going missing** or being recruited as part of County Lines. In addition, it has been found that children and young people have been **sexually abused or exploited** while missing from such settings. It is of utmost importance to understand the factors which make young people vulnerable to such exploitation and to take the necessary steps to safeguard against them; no matter how radical or costly.

This report is not about unregulated or unregistered accommodation, it is about the **spike in use of inappropriate accommodation and the proliferation of inadequate care**. This is not a new issue, but it is an enormously pressing one and whilst no previous government has effectively addressed this issue in the past, we think the new Government can.

It is important to note that some of the media coverage has led to confusion by failing to make technical distinctions, for example, between 'unregistered' or 'unregulated' accommodation. In some cases, the coverage has used technical terms such as 'unregulated' in a pejorative sense; to call provision out as poor-quality. **However, not all 'unregulated' provision is poor.** Provision that provides 'support' as opposed to 'care' is not regulated under current legislation but could still be good quality and appropriately meet the needs of the young people it provides for; it just simply isn't covered by a regulatory framework. However, as the media has exposed, much 'unregulated' provision is utterly inadequate. In addition, it is critical to note that placements that offer 'care' should be registered – if they fail to register, they are operating illegally.

In this report we make three key recommendations:

1. The Government should urgently bolster the registration system and regulatory frameworks such that no child is placed in inappropriate accommodation.
2. A set of aspirational 'five-star' standards should be developed and implemented for local authorities and/or providers so that the adequacy of accommodation is not judged by material provision but on its ability to meet the holistic needs of children.
3. The sufficiency challenge should be tackled by rapidly upscaling the use of Supported Lodgings provision.

This is a systemic issue and will require a response from all parties involved with our care system. This includes, but is not limited to, central Government. It is our hope that strong leadership from central Government will drive these much-needed improvements across the sector.

As this is a devolved issue, this report is applicable to England only. Home for Good is committed to tackling systemic issues across all four nations of the UK and will take a bespoke approach to the issues of inappropriate accommodation and inadequate care for each.

# Parliamentary Interest

It is not just the media that has taken a key interest in the issue of inappropriate accommodation. **Parliamentarians have been highlighting their concerns** through debates about the poor quality of much of this accommodation, resulting in young people going missing<sup>1</sup> within their constituencies<sup>2</sup> and becoming involved in organised crime<sup>3</sup>. Many Parliamentarians have called for regulation<sup>4</sup> of this type of accommodation.

In a recent debate, Andrew Selous MP asked the Government to reconsider a recommendation made by the Education Select Committee in 2014 “...that the DfE consult on a framework of individual regulatory oversight for all accommodation provision that falls within the category ‘other arrangements’ to ensure suitability while allowing for continuing diversity of provision.”<sup>5</sup>

The All-Party Parliamentary Group for Runaway and Missing Children and Adults released a report<sup>6</sup> entitled ‘No Place at Home’ which raised concerns about the high numbers of children being placed far from home, with two-thirds of children who live in children’s homes being placed out-of-area. Freedom of Information (FOI) requests highlighted that more than 70% of police forces reported concerns that children being **placed out-of-area made them more vulnerable to exploitation** and often resulted in them going missing. The group identified a lack of sufficiency as one of the primary reasons behind children being placed far away, although other organisations have highlighted that in some instances placing a child out of area can be in the child’s best interests if they are in danger in their local area.



**...When a local authority takes a vulnerable child into public care, it has a duty in law to be a good parent to that child.**

**Surely it is little short of outrageous for a child who has not had the best start in life to be placed in a caravan or a narrowboat without proper support?**

**Even worse, these children will have been separated from their wider family, friends and school, as they are often placed miles away from their homes.**

**Surely in this day and age this is unacceptable. Will the Minister do all he can to stop it happening?**

*Lord Laming - House of Lords Chamber - 4 November 2019*



1 <https://www.theyworkforyou.com/whall/?id=2019-10-23a.31.0#g32.1>

2 <https://www.theyworkforyou.com/debates/?id=2019-10-15c.261.2>

3 <https://www.theyworkforyou.com/debates/?id=2019-10-16b.271.2#g346.0>

4 <https://www.theyworkforyou.com/debates/?id=2019-01-17a.1395.0#g1416.0>

5 <https://hansard.parliament.uk/Commons/2019-10-15/debates/4E797934-E334-46F8-912F-8701F7F36E75/UnregulatedAccommodation16To17-Year-Olds?highlight=education%20select%20committee#contribution-8BD53520-042C-4139-9EB8-1DFA0737699A>

6 <https://www.childreassoc.org.uk/sites/default/files/no-place-at-home.pdf>

# Government Action

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The keen media and Parliamentary interest has **led the Government to take action**, including commissioning Sir Alan Wood to conduct some research into the use of unregulated and unregistered settings and most recently, the Secretary of State for Education writing to all council leaders to express his concern at the use of 'unregulated' provision for under-16s. **The Government's position is that no child aged under 16 years could possibly be without the need for 'care' and therefore, 'unregulated' provision cannot meet their needs**<sup>7</sup>.

Writing to all local authorities in November 2019, the Secretary of State for Education wrote:



**I am concerned about the number of children under 16 being placed in settings that are not registered with Ofsted, so should not be delivering care, and I am certain that you will want to pay immediate and close attention to those placements...I look forward to working together to make sure these types of placements are eliminated.**



We support this view and encourage the new Government to put all necessary safeguards in place to ensure that children under 16 years are never placed in 'unregulated' provision.

While there is some confusion around the nature and scale of the problem, one thing has become clear - there has been a **dramatic increase in the use of both 'unregistered' accommodation and 'unregulated'** independent and semi-independent living provisions.

Figures from the Department for Education show that between 2010 and 2018 there has been a **29% increase in the use of 'unregulated' independent living**. Though it would be reasonable to anticipate that with rising numbers of 16- and 17-year olds entering the care system, we would see a slight increase in the use of independent living provision, the scale of increase is significant. Further, BBC Newsnight<sup>8</sup> has highlighted that over the past decade, there has been a **70% increase** in the number of 16 and 17-year olds placed in **'unregistered' accommodation**.

There are around **5,000 young people**<sup>9</sup> living in independent or semi-independent accommodation but there is little understanding of the nature of the provision - how it is being commissioned, the demographics of children being served, the costs and the motivations of the providers.

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7 <https://www.bbc.co.uk/news/uk-50323652>

8 <https://www.bbc.co.uk/programmes/p07h8dtx>

9 <https://www.bbc.co.uk/news/uk-48300157>

# Increasing Demand

**W**hat we do know is that the number of children in care is rising and the number of teenagers in care is increasing at a faster rate.

In March 2010, there were 64,400 looked after children in England, while in March 2018 there were 75,420. New research produced by the Children's Commissioner for England's office found that the number of children in care aged 13 or over rose by 21% between 2013 and 2018<sup>10</sup>.



**It is clear that we have a care system which is playing catch up. The new norm is shifting so that fewer babies and very young children are being taken off parents who cannot cope. Instead it is teenagers who are being taken into care... the result is a care system that is struggling to cope and which in turn is not providing the stability that many highly vulnerable children need.**

*Anne Longfield, Children's Commissioner for England*



There is more to be done to understand the reasons for the increasing number of children in care and more investment needed to ensure that families receive the help they need in order to stay together. **We will not solve the care crisis until we support more children to thrive at home with their birth families.**

The Minister for Children and Families, Michelle Donelan recently said:



**This is a complex problem and we have a rising number of children in care, which we need to get to grips with... However, the age of those children is rising; the demand on the system is increasing; and it is a somewhat unprecedented situation.<sup>11</sup>**



Given the rising number of children in care, and the huge increase in the use of both 'unregistered' and 'unregulated' accommodation, there is an immediate **need to understand the drivers causing local authorities to opt for these forms of provision** and to quickly eradicate those which cause children to be vulnerable or even harmed.

<sup>10</sup> <https://www.theguardian.com/society/2019/aug/01/care-system-struggling-to-cope-says-childrens-commissioner>

<sup>11</sup> <https://hansard.parliament.uk/Commons/2019-10-15/debates/4E797934-E334-46F8-912F-8701F7F36E75/UnregulatedAccommodation16To17-Year-Olds>

# Local Decision-Making

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Speaking at a Parliamentary roundtable discussion in the House of Lords on Monday 4 November 2019, Lisa Pascoe, Deputy Director for Social Care at Ofsted said:



**I don't believe there's any social worker in this country who is deliberately making poor decisions but I believe we've got a market that's grown, but not in response to children - it's not where we need it. It's disproportionate in different parts of the country. If you look at the map of where children's homes are across the country, it is not where children are; it's where property is cheapest.**



The proliferation of 'unregulated' semi-independent and independent provision cannot be separated from the reality that the children's social care landscape is a marketplace and that many companies operating in this market are seeking to make a profit. When local authorities have increasing numbers of children in care and a lack of high-quality provision available, **they turn to companies who will house children, even at high expense.** In some cases, a local authority may be using a form of provision in an emergency or as a stop-gap, satisfying themselves that it can meet the immediate needs of a child or young person, but then do not secure better provision quickly enough, leaving the young person in poor provision for the long-term, or even permanently. In addition, the Department for Education has argued that in some cases, local authorities are making poor decisions, **not simply due to a lack of provision but because they do not understand their duties.**



**...recent research commissioned by the Department suggests that, despite our guidelines, some local authorities are genuinely unclear about what is permissible in relation to the use of unregulated and unregistered provision.<sup>12</sup>**



In response to this, the Department is working to ensure that there is **new statutory guidance<sup>13</sup>** so that local authorities and providers are **absolutely clear on the requirements.** The Office of the Children's Commissioner for England is now accessing information from all local authorities about the types of accommodation being used, the circumstances around decisions and how decisions are being made to better understand the reality on-the-ground leading to these events. The results of this research will help provide a clearer picture of some of the baseline processes and decision-making mechanisms leading to instances of poor practice.

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<sup>12</sup> <https://hansard.parliament.uk/Commons/2019-10-15/debates/4E797934-E334-46F8-912F-8701F7F36E75/UnregulatedAccommodation16To17-Year-Olds>

<sup>13</sup> <https://www.judiciary.uk/publications/practice-guidance-placements-in-unregistered-childrens-homes-in-england-or-unregistered-care-home-services-in-wales/>

# Understanding the needs of young people



**I think there's a question around what is appropriate for any 16 or 17-year old. Can any child that age succeed in this type of ('unregulated') accommodation?**

*Simone Vibert – Office of the Children's Commissioner*



As mentioned, 'unregulated' provision is that which offers 'support' rather than 'care' to a young person. Media rhetoric surrounding this issue has consistently painted **'unregulated' provision to be synonymous with inappropriate accommodation** that leaves young people vulnerable to exploitation. However, some 'unregulated' provision will be suitable for some young people and even accommodation that has made the headlines can in some circumstances be received well by young people and meet temporary needs.

'Unregulated' provision being considered acceptable for some young people derives from an implicit assumption that these young people only require 'support' rather than 'care'. **Legally, children under the age of 16 could be placed in 'unregulated' accommodation** and receive 'support' as opposed to 'care'. However, as mentioned earlier, the Department for Education has recently written to council leaders to state **the Government view that children aged under 16 will always require 'care' and should therefore never be placed in 'unregulated' settings**. We support this view.

The **vague definitions of 'support' and 'care'** may also mean that some well-intentioned provision could slip into being 'unregistered' as a young person's needs evolve and change and 'care' begins to be provided. One participant at the House of Lords roundtable suggested that this could apply particularly to Supported Lodgings placements, where the slippery definitions of 'support' and 'care' could result in these placements inadvertently becoming 'unregistered' provision. **It is important that Supported Lodgings hosts and other providers can respond to the needs of those they are supporting**. If there is an inherent risk of becoming 'unregistered' by doing so, this could indicate that the registration system is not sufficiently child-centred and should be reviewed.

However, even with current definitions, a question remains as to when a young person (even if aged 16+) requires 'support' as opposed to 'care' and therefore when an 'unregulated' setting can appropriately and adequately meet their needs.



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Care planning guidance suggests that “The assessment of the child’s needs to inform his/her care or pathway plan may conclude that for some children, these needs will be best met by a placement in ‘other arrangements’ [regulation 28]”<sup>14</sup> or in other words, there **will be instances in which a young person’s needs will dictate the need for a more independent living setting** that will offer ‘support’ and not ‘care’.

The guidance goes on to make it clear that whilst these settings will not be regulated by Ofsted, it will be the responsibility of the placing local authority to ensure that the child’s needs are “matched to the services provided by the placement”.

The Association of Directors of Children’s Services (ADCS) has cautioned against full regulation arguing “We recognise the role unregulated provision can play within the care placement market and the flexibility it offers when linked to a clear plan based on the needs of a young person and a clear support plan. There is a distinction to be made between using it as **part of a considered move** compared with using it to deal with a crisis when no other accommodation is available. **Total regulation would limit this flexibility** so we are keen to see all providers take their responsibilities seriously and **welcome increased expectations around standards and transparency as to how those will be delivered.**”<sup>15</sup>

Ensuring that ‘unregulated’ provision is reaching high expectations and being used as part of considered moves, in response to the needs of young people, will require work to (a) **drive up standards** and (b) **increase capacity** such that there is choice in decision-making. Without aspirational standards in place and sufficient high-quality placements, decisions will be dictated by resources and availability rather than in accordance with the needs of the child or young person.

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<sup>14</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/441643/Children\\_Act\\_Guidance\\_2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/441643/Children_Act_Guidance_2015.pdf) (p.74)

<sup>15</sup> <https://adcs.org.uk/general-subject/article/use-of-unregulated-settings>

# Making Good Decisions - The Role of Relationships



**Someone told me a long time ago that the only thing that a child needs to survive through anything is one adult irrationally committed to their success.**

*Baroness Sherlock*



From consultation with sector representatives, it is clear to us that ensuring provision enables the continuity of existing positive relationships and promotes the development of new relationships with individuals who can support young people, is of utmost importance. In recent years, there has rightly been a focus on ensuring that young people do not find themselves at a cliff-edge when ageing out of foster care or residential care. This has resulted in Staying Put and Staying Close schemes that enable young people to remain with foster carers or near to their residential care home, beyond the age of 18.

Both Staying Put and Staying Close have been welcome developments and are built on the premise that young people in care should experience a **staggered transition into independent living; akin to that of their non-care experienced peers**. However, if a young person goes straight into a semi-independent provision, they are not afforded the benefit of a transition provision such as Staying Put or Staying Close.



**We've always said there needs to be a minimum and shared national understanding of what these places should look like in terms of the children that goes beyond the building and premises but is about relationships and care and the suitability of need. It's about giving young people what they need.**

*Lisa Pascoe, Ofsted*



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**Rushed or pressured placement decisions** that are driven by the need to get a young person into accommodation to meet their basic material needs **will have long-term consequences**. It is vital that even when a young person is deemed to only require ‘support’ and can therefore be placed within an ‘unregulated’ semi-independent or independent provision, they are enabled to maintain and grow meaningful relationships.

These relationships can be with a whole range of individuals, from social workers, to friends, to teachers, to other trusted adults who can give guidance and advice. **Young people should be asked about the relationships that matter the most to them** and provision should be deemed unacceptable if it cannot meet these relational needs.



**They need a social worker who knows them well enough to know what brings them joy, what makes them laugh.**

*Stephanie Bishop, Essex County Council*



Achieving five-star care for children and young people will not simply be solved by improvements in accommodation. Appropriate accommodation is critical, but the importance of enabling strong ongoing relationships must be prioritised. This requires a change in culture; shifting the emphasis from accommodation needs to holistic wellbeing.



**What I needed was warmth of friendship and positive adult role models to help me transition into managing a home. How to fill out forms and make positive decisions. What I did not need was the worry about how I was going to furnish this property I had just signed to look after. No curtains, no carpets and a light bulb I burnt my hand on to take out as I moved room to room – because there was only one. I felt as cold and as empty as the flat that night.**

*Care experienced advocate*



# Making Good Decisions - The Role of Local Communities

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Not only is a young person's relationship with individuals of great importance, but also their connection to the surrounding community, enabling them to **feel part of a locale and understand where they can go to for support or guidance** when they need it. Community groups can play a role in facilitating this and offering support and connection with these young people.

The Centre for Social Justice participated in the Parliamentary roundtable and recently published a report that argues "...community engagement (purposeful participation) affords people social capital. And social capital depends on social infrastructure, that is, **face to face, local networks of people** that congregate in our libraries, village halls and youth clubs. Such places are a lifeline for so many of our most vulnerable and disadvantaged people." <sup>16</sup>



**There's also something that's important which seems to be about the empowerment of communities to actually take responsibility for this issue and to respond themselves.**

*The Rt Revd James Langstaff, Lord Bishop of Rochester and Bishop to HM Prisons*



Whilst we recognise the need for the Government to focus its energy on weeding out 'unregistered' provision and the rogue element of poor 'unregulated' settings, we maintain that securing five-star care for children and young people is what is needed and that this will not be possible if the issue is framed solely as a challenge of finding appropriate accommodation. Whilst in many ways welcome, the media and Parliamentary interest does tend to focus on the most acute cases and could run the risk of narrowing the focus of a policy response.

In achieving five-star care for children and young people, we must look to ensure that they are supported to **build and maintain individual relationships as well as deepening community ties**. Again, this will require a change in culture; moving away from a focus on accommodation towards holistic wellbeing.

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<sup>16</sup> <https://www.centreforsocialjustice.org.uk/core/wp-content/uploads/2019/09/CSJ-Community-Capital-Report-final-version.pdf>



**I first went into foster care when I was 3 years old. My younger siblings followed. They could never find a foster carer who could take all three of us, so we were always split up.**

**When I had just turned 17, I put all my stuff into two black binbags and went to meet my social worker outside my new flat. The first thing I remember is how cold and echoey it was. There was no carpet. No curtains. That first night, I slept on the floor with just a blanket. I felt so unsafe and alone.**

**I didn't need my own place – I needed a home. I needed to eat dinner with a family. I needed someone to tell me it was going to be ok. I needed a hug.**

**You would hope this doesn't happen often. But it does.**

*Becky\*, Care experienced advocate*

\*name has been changed



# Next Steps for Government and other Stakeholders

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**T**his is a systemic issue and there are **numerous actions needed to address it**. We are encouraging the Government to recognise their responsibility to drive significant change in this space and believe they are best placed for doing the following:

- » Firstly, the Government must identify a clear strategy for **eliminating 'unregistered' provision** and the "rogue element" of **low-quality 'unregulated' provision**. We are encouraged that the Government is keen to do so.
- » Secondly, the Government must consult on the role of **regulation** as an appropriate response to the risks to securing high-quality semi-independent or independent provision whilst left 'unregulated'.

While tackling the proliferation of 'unregistered' provision and ensuring that regulation is fit for purpose so that poor 'unregulated' provision cannot exist is the right starting place for Government action, there is much more that needs to be done alongside this. We believe that in addition to Government action and with its support, there is **a role for public, private and voluntary sector organisations** to address the following:

- » Firstly, there is the ongoing challenge of **sufficiency** at the local level and the urgent need to grow capacity to increase the number of appropriate, suitable forms of accommodation available to these young people. We believe that **Supported Lodgings provision could play a key role in this**. The nature of Supported Lodgings provision lends itself well to nurturing a young person's relationships and integrating young people into their local communities.
- » Secondly, while the regulations stipulate minimum requirements for accommodation to be considered 'suitable' for these young people to be placed in, we are exploring the possibility for **a set of aspirational voluntary standards for local authorities and/or providers** to drive up the quality of care that young people receive.
- » Finally, we believe that there is a **crucial role for the business community** to play. Not only in providing excellent semi-independent and independent living settings but also in helping young people in care to **integrate into society and flourish in adulthood**. The business community is already playing a significant role through the Care Leaver Covenant to offer young people in care apprenticeships, work experience and free or discounted goods and services. Any effort to secure five-star care should be linked in with opportunities provided by the Care Leaver Covenant.

Home for Good is currently exploring the potential of Supported Lodgings provision and the role of aspirational voluntary standards. The role of business should be included via the Care Leaver Covenant.

# Aspirational Standards: Five-Star Care

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Aspirational sets of voluntary standards, that encourage institutions or agencies to **go above and beyond minimum requirements**, are used and seen as beneficial across different sectors. Such standards can act as an aspirational 'carrot' in seeking to drive up the quality of care where regulations might provide the 'stick'.

An example might be the Real Living Wage (RLW) versus the National Living Wage or National Minimum Wage. While the latter two are statutory minimum financial standards that all organisations are required by law to oblige, the Real Living Wage suggests an aspirational standard of pay that companies can voluntarily choose to adopt.

The RLW was created because of an assertion that the national minimum and living wage set by the Government do not enable individuals to truly meet the cost of living and therefore the RLW aims to ensure that employees' financial needs can be sufficiently addressed<sup>17</sup>. Such a scheme often evokes a chain reaction; as more companies choose to pay this higher wage and attain the associated status of a 'Real Living Wage Employer', other companies feel incentivised to match the financial offer of other companies and a **cultural shift** happens through which salaries are lifted.

While the Government, together with Ofsted, are well-placed to enforce minimum standards, a set of aspirational standards held and managed by an independent group could bring about a cultural shift within the sector to **drive up standards of provision**. The existing minimum standards<sup>18</sup> that are used to determine whether accommodation is suitable simply cover practical elements such as whether the provision has a lock on the door or a gas safety certificate. However, much of the guidance is basic, loosely worded and vague, leaving room for wide variation in interpretation and therefore in quality.

## **Could a set of aspirational standards, co-produced with care experienced individuals result in uplift in quality of provision for these young people?**

If so, should the standards be produced by a third party and adopted by **local authorities** in their commissioning or should they be produced by a third party and awarded as a kind of **"kitemark" to providers** who meet them?

These questions were put to attendees at the Parliamentary roundtable hosted by Baroness Sherlock. While attendees were clear that more should be done to drive up standards, they were concerned that this should not be instead of **rigorous regulation** and that these standards will only be effective in tandem with a focus on **capacity building**.

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<sup>17</sup> <https://www.livingwage.org.uk/what-real-living-wage>

<sup>18</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/441643/Children\\_Act\\_Guidance\\_2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/441643/Children_Act_Guidance_2015.pdf)

# Aspirational Standards: Five-Star Care (continued)



**The challenge with voluntary standards particularly in an environment where sufficiency is an issue, is what is the motivation for providers to sign up? Is there a risk that you introduce another level for those providers who are already providing the kind of accommodation and support we want to see and potentially not getting at the part of the market where we're seeing the homes which are the problematic ones?**

*Katherine Sacks-Jones, Become*



However, a set of aspirational standards are offered as the 'carrot' to work in tandem with the 'stick' of baseline, minimum standards that should be implemented and enforced by the Government and possibly, Ofsted. As Baroness Sherlock highlighted:



**Children have fundamental rights and somehow those need to be identified, agreed together and protected. One of the reasons why we establish things in law is so that no matter how tough things get there are standards below which can't slip.**



The existing minimum requirements should be more effective in driving out provision operating with unacceptably low standards, but they cannot create a visionary picture of care for these young people in the same way that a separate set of aspirational standards can. Baroness Sherlock helpfully laid this out, saying:





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**I really want to encourage you to have a vision of what ‘good’ looks like. Even if it doesn’t seem possible at the moment or that we can move forward or manage it or move from here to there, how do we begin the journey so that we know where we’re going? At least understanding what it is we’re trying to get to occurs to me to be a really important part of the journey.**



Despite this visionary ideal, day-to-day practice in a context of insufficiency, when decisions are being made at the eleventh hour, could be challenging to marry with this set of standards and could render them ineffective:



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**When Local Authorities are scrabbling around for a place, are they going to put in that additional time looking for better quality homes?**

*Katherine Sacks-Jones, Become*



An important element of discussion around provision for this cohort of young people in care is the motivations and context of the providers. Anecdotally, it was suggested that most provision is given by for-profit agencies or individuals and this impacts their reasons for providing accommodation and/or support for these young people.

Participants highlighted that as such, this kind of provider may be less interested in considering an aspirational level of provision for these young people, which goes beyond accommodation and meeting basic requirements to providing holistic support.

# Aspirational Standards: Five-Star Care (continued)



**We've been talking about the need for building community and building connection but for-profit agencies are not interested in that. They're not interested in that lifelong connection.**

*Chris Allcock, Safe Families for Children*



An important question that was left unanswered through the discussions was whether a set of aspirational standards would be voluntarily adopted by providers or by local authorities. Clearly any effort to drive up the standards of providers will need to engage with their relative motivations; including profit-making.

Other participants mentioned how the sufficiency challenge impacts the scope of including young people and ensuring that their voice is meaningfully embedded and acted upon in making provision choices.



**I really want us to challenge ourselves about how we get the voice of the child into creating the quality standards of care that we're talking about and I think that's absolutely do-able. There's a good point that some of these children might not have high enough aspirations for themselves but there's no reason why their initial aspirations shouldn't be stretched over a period of time.**

*Emma Franklin, Social Care Lead, PwC*



Home for Good is continuing to explore the role of aspirational standards and will make recommendations on this in due course.

# Growing capacity: Supported Lodgings

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In addressing the issues relating to 'unregistered' and 'unregulated' provision, the issue of capacity or sufficiency must be addressed.

In conversation with sector stakeholders, Home for Good has been exploring the potential of upscaling **Supported Lodgings placements to address capacity and sufficiency issues at the local authority level**. Many local authorities are already making good use of this form of provision. However, we believe it is under-utilised and suffers from a lack of national guidance, infrastructure, funding and public awareness.

Volume 3 of the guidance and regulations surrounding the Children's Act (1989) is useful for understanding the existing guidance around Supported Lodgings, specifying that:

- 7.60 The term supported lodgings **has no formal definition or prescribed regulatory framework**, but supported lodgings services generally share key common characteristics. They provide accommodation for a young person within a family home, where the young person will have a degree of independence with their own room and will share the kitchen and bathroom facilities with the family or householder – or "host". Hosts can be families, couples or single people.

Supported Lodgings falls under the category of semi-independent accommodation and is therefore technically 'unregulated'. However, this form of provision is intended to provide young people in the care system with **a supportive household environment to enable them to develop practical, emotional and relational skills for independence**. For authorities who commission or provide Supported Lodgings schemes, they are required to ensure that clear procedures and policies are in place that set out the assessment and approval criteria for carers or hosts, the allowance and fees structure and income tax, national insurance and welfare benefit frameworks affecting payments made to carers or hosts.

Despite this guidance, our conversations with providers over the past six months has highlighted to us that there is **great variation in understanding** of what Supported Lodgings should look like in all aspects. As such, **we believe that it is underused** and holds untapped potential.

The strength of Supported Lodgings lies in its flexibility and ability to provide a family environment for a young person without requiring participation in family life in the same way as foster care. A host does not hold the same parental responsibility for a young person, but often benefits from a similar level of training as foster carers.

Supported Lodgings is well-placed to meet the relational needs of young people. Supported Lodgings Hosts generally go through a thorough assessment and approval process, giving local authorities confidence in the quality of the provision.

## Growing capacity: Supported Lodgings (continued)

At a conference on Supported Lodgings held in April 2009, schemes and stakeholders from across the sector expressed strong support for a **national umbrella body to represent Supported Lodgings as a whole**. This was intended to enable good practice to be shared nationally and to provide a vehicle through which cross-sector perspectives on Supported Lodgings could be communicated to decision makers around policy decisions. Such a body has never materialised.

Again, the idea to expand the scope of Supported Lodgings was stress-tested with participants at the Parliamentary Roundtable.

Participants present recognised, both within themselves and their own children, the need for ongoing support, development and teaching of natural life skills well beyond the age of 16. These life skills, including budgeting, gardening and paying rent and bills were identified as being just as important as the physical characteristics of the accommodation, especially given that young people are often entering this provision as a “stepping-stone” towards independence. Speaking from her own experience of being in care and what she needed at this age, a care-experienced adult in the room shared powerfully about her need for practical support and guidance, based on the absence of these from her experiences growing up:



**I came from a family who didn't budget, who didn't do normal living, I had no idea how to pay my rent, I was from a house that didn't do that. Living in a house wasn't the answer. I needed holistic, all-round support and guidance from adults who did adulting really well and not really bad.**



Similarly, Dr Krish Kandiah shared the story of a young man who thought he just needed accommodation, but quickly realized how important it was to live with people who truly cared for him:



**We met a lad who had come from Iraq, age 16 in the back of a refrigerated lorry and got really sick and then is welcomed into a family and he said 'I thought I was just looking for somewhere to live but I've found a family that love me'**



Attendees were keen to stress that a family-based setting would not be appropriate for all older teenagers in care and indeed, another care-experienced participant shared a little of her story saying:



**I was put into a family and I found that very difficult. I'd had a very chaotic upbringing and suddenly I was put in a family and they expected me to sit and eat at their table with a knife and fork every night. I'd never done that, and I had no intention to start doing that at the age of 15. I wanted to move out and be independent, but that option was taken away from me because it was assumed I wouldn't want that.**



**All attendees were clear that all provision must enable the growth and maintenance of strong personal relationships** and that for many young people, a Supported Lodgings arrangement with live-in carers could be instrumental in securing this. Furthermore, it is important to strike the appropriate balance between hearing from young people about the provision they feel they need and tempering this with the knowledge that young people should never lose an opportunity to go back to a family-based setting because at one stage they thought they would like to try a more independent setting.

Many participants agreed that the name 'Supported Lodgings' was no longer fit for purpose, due to its convoluted definition and varied understanding around what it constitutes. Not only that but it fails to communicate the relational emphasis behind this form of provision. Speaking into this, Samantha Callan said:



**Given it seems to be so unspecified and not many local authorities have much understanding of it, let's change the name right from the word go. It's got so little explanatory power. It sounds familiar but it also sounds so cold. I wouldn't want to live somewhere in supported lodging. We don't use the word lodging anymore. We urgently need to give an aspirational type of name to this."**



**Home for Good will continue to explore the scope of Supported Lodgings provision and make recommendations to the Government in due course.**

# Next Steps

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**While the new Government settles, Home for Good will continue to consult with the sector and explore the role of new aspirational standards and upscaled Supported Lodgings provision.**

In doing so we anticipate the need to address some or all of the following:

1. Consider further how a set of aspirational standards will gain traction within the sector and where they might be best targeted i.e. at providers or local authorities. We will give thought to whether there is a role that central Government can play in making these standards weighty and impactful.
2. It was highlighted that the lack of definition around Supported Lodgings was fueling uncertainty among Local Authorities about whether they should be using it and if so, how and who for. Home for Good has submitted FOI's to all local authorities across England to identify the use of Supported Lodgings in order to gather best practice and consider developing a definition and parameters to help provide clarity.

It is our intention to provide the new Government with a set of recommendations by Summer 2020.

If you would like to discuss any of the issues contained within this report with the advocacy team at Home for Good, please email [\*\*advocacy@homeforgood.org.uk\*\*](mailto:advocacy@homeforgood.org.uk)

# Glossary

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'Other Arrangements' is the term used for accommodation and placements for looked after children and care leavers (aged 16 & 17) that are not registered under the Care Standards Act 2000 and are therefore not inspected by Ofsted. These arrangements can fall into some of the following categories:

**Unregulated** – Provision that is not regulated by Ofsted as it is deemed as offering 'support' to young people to live independently.<sup>19</sup>

**Unregistered** – Provision that provides 'care' (which is beyond 'support') to a young person under the age of 18 should be registered with Ofsted. It is illegal to be unregistered if you are offering 'care' to a young person.

**Independent** – In this form of provision, a young person is placed outside of a domestic setting (with a host family or with family or friends) and instead is placed in accommodation by themselves or with a shared occupancy. Within these settings, young people should be able to access 'floating support' where housing support workers make regular visits to support young people in developing skills for adulthood.

**Semi-independent** – For the purposes of this report, this term generally refers to the placement of children and young people in family domestic settings but where the adults do not hold the same parental responsibility as foster care. It is a closer form of support for young people who are journeying towards independence.

**Staying Put** – An arrangement whereby a young person remains with their foster carer beyond the age of 18. When this transition occurs, the young person is no longer looked after but becomes a care leaver with the foster carer no longer acting in this capacity towards the young person. This arrangement can remain until a young person's 21st birthday.

**Staying Close** – Similarly to Staying Put, Staying Close allows young people who have been living in a residential home to be placed in accommodation nearby to the home and receive ongoing support from the residential home beyond the age of 18. This arrangement is designed to enable the continuity of relationships that the young person has developed with staff in the residential home.

**Care Leaver Covenant** – Introduced by the Government in 2018, this scheme enables private, voluntary and public sector bodies to pledge support and opportunities for care leavers to help them transition towards independence.<sup>20</sup>

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<sup>19</sup> <https://www.stephensons.co.uk/site/blog/professional-discipline-blog/ofsted-release-unregistered-and-unregulated-differences-guidance>

<sup>20</sup> <https://www.gov.uk/government/collections/care-leaver-covenant--2>



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