



Department  
for Education

# **Analytical report: consultation on introducing national standards for unregulated provision**

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**Professor David Greatbatch and Sue Tate**

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# Executive summary

## Introduction

On 24 May 2021, the Government launched a consultation on introducing national standards and an Ofsted-led registration and inspection regime for independent and semi-independent settings for 16- and 17-year-old looked after children and care leavers. The Government launched both a main version of the consultation which was aimed at local authorities, providers, and other stakeholders and a version specifically intended to be answered by children and young people (CYP). This report presents the findings from an independent analysis of responses to both versions of the consultation.

## Methodology

The Department developed and published the consultation questions and supplied the researchers with an anonymised Excel file of all responses to the consultation. A total of 219 respondents completed the main consultation questionnaire, with 195 using the online portal and 24 submitting their responses offline. A total of 45 care-experienced children and young people completed the online questionnaire that was specifically designed for them.

For the open-ended questions, the researchers used an inductive analytical approach to identify key themes and subthemes in the responses and used these to develop coding frames. The researchers then used the coding frames to manually code responses to each of the open-ended questions in Excel. Having completed the coding, the researchers prepared frequency tables for all the closed-ended questions and open-ended questions.



# Key findings

## Main consultation

This section of the executive summary presents the key findings under each of the questions in the main consultation questionnaire, which was completed by 219 respondents.

### **How should the Government distinguish between ‘care’ and ‘support?’**

Respondents were asked to indicate the extent to which they found 12 indicators helpful in distinguishing between ‘care’ and ‘support’. As can be seen in Table 1, apart from an indicator concerning ‘aftercare’, all the indicators were rated as helpful or very helpful by a majority of respondents.

**Table 1: Percentage of respondents rating the indicators as helpful or very helpful in distinguishing between care and support**

<b>Proposed indicators</b>	<b>% of respondents</b>
Does the establishment’s literature promise the provision of care or relate to specific care support provided to all residents?	74 per cent
Can young people go out of the establishment without staff’s permission?	73 per cent
Are there regularly significant periods of time when young people are on the premises with no direct staff supervision?	70 per cent
Do young people have control over what they wear and the resources to buy clothes?	69 per cent
Do young people have full control of their own finances?	66 per cent
Are young people in charge of meeting all of their health needs?	60 per cent
If the establishment accommodates both adults and young people, do those under 18 have any different supervision, support, facilities or restrictions?	60 per cent
Does the establishment provide or commission a specialist support service, which forms part of the main function of the establishment?	59 per cent
Can young people choose to stay away overnight without first seeking permission?	59 per cent
Is there a sanctions policy that goes beyond house rules and legal sanctions that would be imposed on any adult?	58 per cent
Do staff have any access to any medical records?	57 per cent
Do staff have any responsibility for aftercare once a young person has left?	50 per cent

Respondents suggested that the indicators could be improved by: more clearly acknowledging that young people require (and often request) assistance with tasks such as budgeting and healthcare; taking more account of safeguarding issues; recognising that the journey to independence for young people also occurs in registered children’s homes and that, as a result, some of the indicators can also be true of them.

### **Should the Government define all of this provision as ‘supported accommodation for older children’ in future?**

Respondents were fairly evenly split on whether the Government should define all of this provision as ‘supported accommodation for older children’ in future. Thirty-seven percent (78) of respondents felt that the term ‘older children’ should be replaced with ‘young people/adult’ or similar expressions. For some, this was because they felt this would not be a term that would be welcomed by 16–17-year-olds transitioning to adulthood, for

others, accommodation often catered for young people up to 21 or 25 and so the term was not an appropriate description of provision. Conversely, others welcomed the term as it made clear that that 16–17-year-olds were not yet independent, and that support was still required.

Where respondents suggested a more comprehensive name change for this type of provision, there was no consensus on what that change should be, although a number of suggestions involved 'semi-independent' or some sense of this being a transitional phase. A frequent concern was the variation in types of current provision (including that which also housed young people up to age 25), as well as the role of care to meet the needs of some young people, and how this would be reflected in the proposals.

### **Examples of the types of independent or semi-independent provision that exist in the sector**

Respondents identified 43 examples of types of provision, including Supported Accommodation (also often called Supported or Group Living) (n=89), Semi-independent (n= 69), Supported Lodgings (n=34), Floating Support (n=27), single occupancy accommodation (n=25), Supported tenancies (n=14) , shared accommodation without on-site support (n=12) and outreach (n=9). It is clear that several terms are used interchangeably by some, whereas to others the terms have different and distinct meanings. However, there is no agreed definition for the majority of terms in use, although the range does reflect a very diverse range of provision in the semi-independent and independent space.

### **Are there examples of where it would be appropriate to place a looked after child or care leaver aged 16 or 17 in a setting that does not deliver any care or support?**

Over 80 per cent of respondents thought that it would be inappropriate for 16- or 17-year-olds to be in a setting that did not deliver care or support with only ten per cent feeling that this could be appropriate in some circumstances. The reason given by most respondents was that 16- and 17-year-olds are not yet adults and would need support to transition to successful independent living. Even those who thought that this would be appropriate in some circumstances frequently made the point that they would still expect young people to have access to support when required such as that provided by the local authority or universal services.

## **Are the proposed national standards missing anything that you would expect of any provider of independent and/or semi-independent provision?**

There was no one area in which respondents agreed that standards were missing, with the issues raised by the highest number of respondents being: more detail required on qualification and training requirements for staff, including minimum requirements (n=13); the need to strengthen requirements in respect of the standard of accommodation provided (n=11); the standards should simply be the same as those for children's homes (n=10); clearer requirements needed about the nature and frequency of inspections (n=9); the need for the standards to be specific about requirements for pre-placement visits and interviews with the provider, including the involvement of partner agencies (n=6); support requirements should be strengthened, the most frequent being that the provider should ensure the young person is at the centre of provision and that how their voice will be heard/influence service delivery and support planning (n=11); and the support element should include a requirement on how providers will support young people to transition to independence (n=9).

## **Are there any elements of the proposed national standards that you think would be difficult for providers to implement?**

Only 89 respondents raised issues in respect of this question. Of these, many raised issues concerning the totality of the requirements and the implications of these on costs (n=19) and the flexibility (n=9) linked by some to a perceived regulatory burden (n=9) and a concern over subsequent loss of provision (n=8). A particular concern of ten respondents was how the standards would apply when providers operated across multiple properties, some of which might be very small and/or short-term.

Uncertainty about what suitable qualifications would be for staff and how this would impact on recruitment was the biggest specific issue raised for individual elements of the standard (n=20). The requirement for location assessments was the next biggest concern (n=16).

## **Which elements of the proposed national standards would carry the most significant costs? How much do you expect the costs of provision to increase by if these national standards are introduced?**

Most respondents thought that staff-related additional costs were likely to be most significant, particularly the cost of additional training (n=71) but also in increased staffing (n=35) and in employing additional registered managers (n=21). Many respondents thought that increased training and qualification requirements would also have the effect of raising salary costs (n=30).

Additional costs associated with administration and reporting costs were also thought to be significant (n=51), along with improving standards of accommodation (n=33) and the cost of registering provision (n=29). Most respondents felt that they didn't have sufficient information as yet to quantify likely additional costs (n=97) and, for those that did make suggestions (n=30), these varied widely between no or minimal additional costs and a doubling of current costs. Where additional costs were given, it was often difficult to understand the basis of the figures (e.g. whether they applied per provider, setting or child; were they one off costs, annual or weekly?).

### **What are the main advantages and disadvantages of a model where Ofsted registers and inspects at individual-setting level (model 1)?**

The most cited advantage of registration and inspection of individual premises was that it would ensure high standards in all settings (n=133). Increasing the consistency of provision across different settings run by larger providers was highlighted by 40 respondents, while 21 respondents felt that setting-level registration and inspection would make managers accountable for their own services and would be more likely to identify cases of 'poor leadership on the ground'. Other advantages that were highlighted included: safeguarding concerns on the front line of the provisions being more easily identified by Ofsted (n=15); less likelihood of particularly poor settings or rogue providers evading detection (n=13); young people having the opportunity to speak directly to Ofsted inspectors (n=10); enhancing local authorities understanding of the quality of provision in their localities (n=10); and comprehensive checks on staff quality (n=5).

The main disadvantages identified by respondents were increased costs and workload for providers (n=71), Ofsted (n=39), local authorities (n=15) and for the sector in general (n=32). The possibility that that the model may not be practicable due to the volume of individual settings Ofsted would be required to inspect was mentioned by 37 respondents, while thirty-five respondents thought the model could result in providers leaving the 16-17 market due to the cost implications or because they are forced to close. Other disadvantages mentioned included: reduced flexibility of the market to respond quickly to needs, especially emergency placements (n=19); the possibility that young people might regard visits to their homes by Ofsted inspectors as intrusive (n=13); the potential development of a tick-box culture (n=12); providers may experience difficulties recruiting and retaining a registered manager for each setting (n=8); reduced sufficiency and flexibility of provision (n=5); and possible overlap between Ofsted and local authority monitoring of independent and semi-independent providers (n=4).

### **What are the main advantages and disadvantages of a model where Ofsted registers and inspects at provider level (model 2)?**

The main advantages identified in relation to provider-level registration and inspection were: Ofsted inspectors getting a holistic understanding of services operating under the

umbrella of one provider (n=54); being less administratively complex than model 1 (n=46); less costly for providers to implement and maintain due to having one manager responsible for an overall service and fewer on-costs for local authorities (n=36); effectiveness of the model as a means of improving the quality of provision (n=29); and streamlined processes of registration that would allow providers to flex their accommodation portfolios to meet the needs of young people being referred (n=17).

The main disadvantages identified were: less accountability for individual settings (n=67); the possibility of the Ofsted inspectorate overlooking poor practice and safeguarding issues in sub-standard settings (n=33) and/or inconsistencies in the way individual settings are being run under the umbrella of multi-setting providers (n=23); making it easier for providers to divert attention away from poor practice and unsuitable living environments (n=17); increased costs for providers due to need to register with Ofsted and recruit and pay the salaries of registered managers (n=13); and less contact with, and direct feedback, from service users (n=11).

### **If an alternative model would be appropriate, what should the key features of this be?**

The most common suggested alternative was inspection by the Local Authority (n=26), followed by a hybrid model combining models 1 and 2 (n=21), then a regime that mirrored that for children's homes (n=12). Local authorities, providers and charities were most likely to suggest a local authority led monitoring model, whereas a regime similar to that operating in children's homes was not supported by any providers and only two local authorities.

### **How often should providers and/or settings be inspected?**

Respondents suggested a wide range of models for inspection, but the largest number of respondents (n=64) favoured annual inspections for both providers and individual settings. This represents 40 per cent of those respondents who answered this question (n=159).

## **CYP Consultation**

This section of the executive summary presents the key findings under each of the questions in the CYP consultation questionnaire, which was completed by 45 care-experienced children and young people.

### **How should 'care' and 'support' be distinguished?**

As can be seen in Table 2, a small majority of the CYP (23) thought that the proposed indicators for distinguishing between 'care' and 'support' are fit for purpose. Responses

from the four CYP who did not think this was the case suggested that some of the indicators may need to be revised to accommodate help they receive from staff, which they regard as 'support' rather than 'care'.

**Table 2: CYP's views on the proposed indicators for distinguishing between 'care' and 'support'**

Indicators are a good way to distinguish between 'care' and 'support'	23
Indicators are not a good way to distinguish between 'care' and 'support'	4
Not sure	18
Total	25

### **Should this type of accommodation be called 'supported accommodation for older children'?**

Just over half (24) of the CYP indicated said that 'supported accommodation for older children' would be a good name to describe independent and semi-independent accommodation in the future. Eight of the CYP who thought the name should be used in the future explained their answer in terms of the name being clear and easy to understand, while 10 cited its accuracy. Of the 11 CYP who did not think it would be a good name, six indicated that that they were unhappy with the reference to 'children' and would prefer '16+', 'young adults' or something similar.

### **Experience of independent and semi-independent accommodation**

The majority of accommodation with which young people had experience or knowledge was semi-independent followed by shared or supported housing. Of 45 respondents, 21 said they shared, or had shared, accommodation with others. The number shared with ranged from one other to 19, but in some instances sharing seemed to be confined to the building and, possibly, some communal areas. Other respondents either lived alone or did not provide an answer to the question.

Six respondents made clear that accommodation was used for those aged 18 or over, including one respondent aged 18 who shared with one other person who was in his thirties. Five respondents felt that the support they were given was very limited but, for those who did receive support, the most common areas in which respondents said they received help were with money and budgeting (n=13), education (n=7), independent living (n=6) and cooking and healthy eating (n=7).

In terms of positives, the area cited by most respondents was the standard of the accommodation (n=9); this was followed by the quality of the care and the support they

received (n=7). When asked what could be improved, only 15 respondents provided an answer and those responses were very varied. The most common was issues linked to other occupants, particularly where they were older, as well as safety concerns.

### **Views on the proposed standards: Is there anything missing from or should not have been included in the new proposed rules?**

Twenty respondents could not see anything missing in the proposed standards and only eight gave suggestions for things that they felt should be added. Of these, most focused on ensuring that the support needs of young people were fully met. Only two respondents answered the question on whether anything had been included that shouldn't have been, both commenting that the focus was not on care.

### **Is it a good idea for Ofsted to inspect independent and semi-independent accommodation in future?**

Of the thirty respondents who answered this question, the majority (n=23) agreed that Ofsted should inspect provision. This was mostly because they thought this would raise standards with a smaller number thinking it would improve safety and ensure that the voices of children and young people in the provision were heard. For those with concerns about Ofsted carrying out inspections, this was predominantly to do with fears that this would lead to a reduction in their independence.



## Introduction

### Policy context

In February 2021 the Government published its consultation response on reforms to unregulated provision and committed to:

- Banning the use of unregulated provision for children under the age of 16.
- Consulting on the introduction of national quality standards for settings for 16 and 17 year olds and an Ofsted-led registration and inspection regime.
- Legislating to give Ofsted additional powers to take action against illegal unregistered children's homes.

On 24 May 2021, the Government launched the consultation on introducing national standards and Ofsted-led registration and inspection for unregulated independent and semi-independent provision that accommodates looked after children and care leavers aged 16 and 17. The Government launched both a main version of the consultation which was aimed at local authorities, providers, and other stakeholders and a version specifically intended to be answered by children and young people (CYP). This report presents the findings from an independent analysis of responses to both versions of the consultation.

### Objectives of the analysis

The objectives of the analysis were to:

- Analyse responses to the questions included in both versions of the consultation.
- In so far as possible, compare the views expressed within and between different groups of respondents.
- Summarise key findings in relation to each of the proposed reforms.

### Methodology

The Department developed the consultation and supplied the researchers with an anonymised Excel file of all responses to the main and CYP consultation; names of individuals and organisations were removed but the data indicated whether the response was by an individual or organisation, and the broad type of that organisation. A total of 219 respondents completed the main consultation questionnaire, with 195 using the online portal and 24 submitting their responses offline. Of these, 173 answered on behalf of organisations and 46 responded as individuals. As can be seen in Table 3, in the case

of organisations, the largest respondent groups were Independent and semi-independent provision providers, local authorities, charities and representative bodies.

**Table 3: Organisations by type**

<b>Organisations</b>	<b>Number of respondents</b>
Independent and semi-independent provision provider	54
Local authority	51
Charity	30
Representative body	13
Registered children's home provider	>5
Police	>5
NHS Trust	>5
Provider	>5
Other	19
Total	173

As Table 4 shows, those who indicated that they were responding as individuals described themselves in terms of an array of roles:

**Table 4: Individuals by type**

<b>Individuals – type</b>	<b>Number of respondents</b>
Independent/semi-independent accommodation worker	6
Social worker	6
Residential children's home worker	4
Local authority employee	3
Named/Designated nurse for looked after children	3
Parent/carer	3
Care leaver	3
Academic	2
Foster carer	1
Police officer	1
Children's services commissioner	1
Independent/semi-independent accommodation service manager	1
Responsible individual of a residential children's home organisation	1
Children's social care manager with responsibility for care leavers living independently with support	1
Regional manager	1
Service manager of semi-independent services	1
Director of Registered Provider of Children's Homes	1

Director of quality in education and children’s social care sector	1
Education director	1
Independent advocate	1
Regulation 44 visitor	1
Previous care leaver	1
Campaign Leader, Associate and Trustee of charities	1
Not indicated	1
<b>Total</b>	<b>46</b>

A total of 69 respondents completed the consultation questionnaire for care-experienced children and young people. Of these 45 represented valid responses, with the remainder comprising non-care-leaver adults and organisations who had mistakenly chosen to use this version of the consultation to provide feedback.<sup>1</sup> As can be seen in Table 5, 19 described themselves as currently in care and 20 described themselves as care leavers. Those CYP who did not select one of these terms, referred to themselves as UASC (2), CIN (children in need) (2) and living in semi-independent/supported accommodation (2).

**Table 5: Children and young people (CYP) by type**

<b>CYP</b>	<b>Number of respondents</b>
Currently in care	19
Care leavers	20
Other	6
<b>Total</b>	<b>45</b>

The main consultation contained a total of 25 questions, which comprised eight personal questions, 14 open questions, two closed questions and one Likert scale question. The children and young people’s version of the consultation was a shorter and more focused version of the main consultation, with some questions removed and some focussed questions to suit the interests and experience of children and young people. This version comprised four personal questions, six open questions and three closed questions.

For the open-ended questions, the researchers used an inductive analytical approach to identify key themes and subthemes in the responses and used these to develop coding frames. The coding frames were tested by both researchers coding a sample of responses and checking where any decisions differed or were problematic and amending

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<sup>1</sup> The responses of adults who completed the CYP questionnaire cannot be incorporated into the analysis of either the main consultation or the CYP consultation, as the questions answered were specifically designed for young people. An indication of the views of these respondents is provided in footnotes.

the frames where necessary. The researchers then used the coding frames to manually code responses to each of the open-ended questions in Excel.

Having completed the coding, the researchers prepared frequency tables for all the closed-ended questions and open-ended questions and used these tables to identify where respondents had contrasting views and where there was consensus.

## Main Consultation

### Questions 9 and 10: To what extent do you believe that each of these indicators is helpful in determining whether a provider is delivering 'care' or 'support'?<sup>2</sup>

Q9) To what extent do you believe that each of these indicators is helpful in determining whether a provider is delivering 'care' or 'support'?

Q9.1) Can young people go out of the establishment without staff's permission?

Q9.2) Do young people have full control of their own finances?

Q9.3) Do young people have control over what they wear and the resources to buy clothes?

Q9.4) Are young people in charge of meeting all of their health needs, including such things as arranging GP or specialist health care appointments? Are young people in full control of their medication?

Q9.5) Do staff have any access to any medical records?

Q9.6) Can young people choose to stay away overnight without first seeking permission?

Q9.7) Is there a sanctions policy that goes beyond house rules and legal sanctions that would be imposed on any adult?

Q9.8) If the establishment accommodates both adults and young people, do those under 18 have any different supervision, support, facilities or restrictions?

Q9.9) Are there regularly significant periods of time when young people are on the premises with no direct staff supervision?

Q9.10) Do staff have any responsibility for aftercare once a young person has left?

Q9.11) Does the establishment's literature promise the provision of care or relate to specific care support provided to all residents?

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<sup>2</sup> The first eight questions related to respondents' organisation, role etc.

Q9.12: Does the establishment provide or commission a specialist support service, which forms part of the main function of the establishment?

Q10) Please explain your answer - We are particularly interested in hearing why you disagree with the use of any of the above indicators, and if any important indicators are missing

These questions consisted of a Likert scale question that enabled respondents to indicate the extent to which they found 12 indicators helpful in distinguishing between care and support, followed by an open question that asked respondents to explain their answers. The latter question steered respondents toward explaining disagreement with any of the indicators and highlighting any indicators that were missing which they regarded as important.

With the Likert scale question, we show overall numbers/percentages of respondents that rated each indicator as 'very helpful', 'helpful', 'neither helpful nor unhelpful', 'unhelpful' or 'very unhelpful'. We also provide a breakdown of responses by the three largest respondent groups, which are providers, local authorities and charities. In the case of other organisation types and those who responded as individuals, the numbers were relatively small and there were no discernible patterns by how they described themselves. Full details of breakdown by organisation/individual respondent type are provided in Tables 12-35 in Annex A.

**Question 9 and question 10: To what extent do you believe that each of these indicators is helpful in determining whether a provider is delivering 'care' or 'support'?**

**Question 10: Why respondents disagree with the use of any indicators, and if any important indicators are missing**

Only 15 respondents suggested additional indicators that could be used to distinguish 'care' and 'support'. Their suggestions were varied and are listed in Table 36 in Annex A.

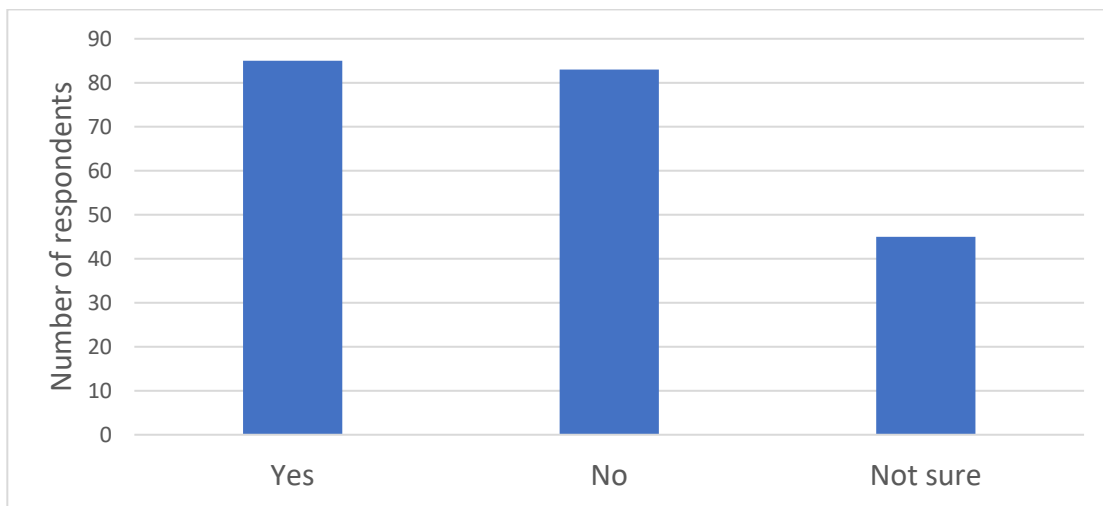
## Questions 11 and 12: Do you agree that the Government should define all of this provision as ‘supported accommodation for older children’ in future?

Q11) Do you agree that the Government should define all of this provision as ‘supported accommodation for older children’ in future?

Q12) Please explain your answer, including any alternative suggestions

### Question 11: Do you agree that the Government should define all of this provision as ‘supported accommodation for older children’ in future?

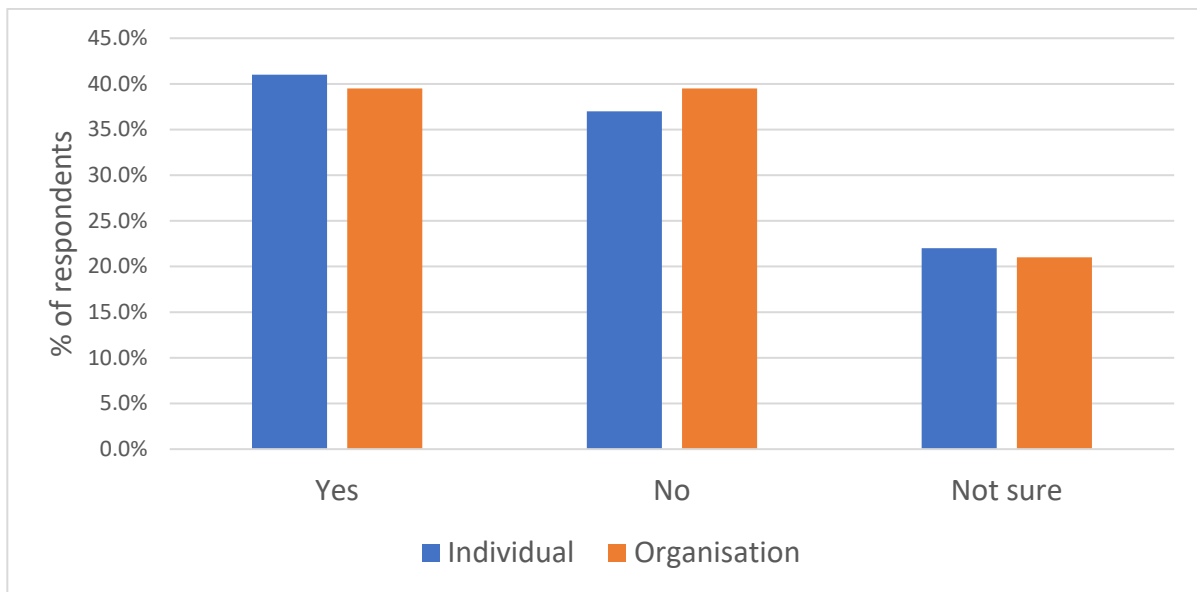
Figure 1: Q11: Do you agree that the Government should define all of this provision as ‘supported accommodation for older children’ in future?



Source: Responses to Q11; n=213

Respondents were almost evenly split between Yes (n=85) and No (n=83) on this question, with around a fifth of respondents (n=45) unsure. The split was similar whether respondents were answering as individuals or organisations.

**Figure 2: Q11: Do you agree that the Government should define all of this provision as ‘supported accommodation for older children’ in future (% of individuals and organisations)?**



Source: Responses to Q11; n=213

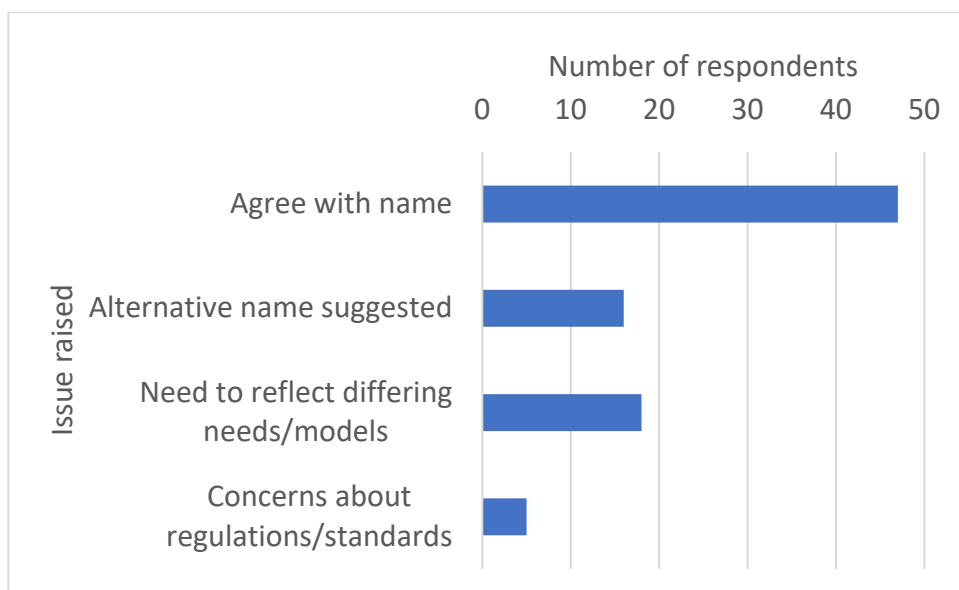
For those answering for an organisation, respondents demonstrated a similar split with the exception of those responding for a charity where a much higher number (17) answered ‘No’ (17 out of 28) than ‘Yes’ (5). For those responding as individuals, there was no obvious pattern by how they described themselves and their response; however, numbers are very small. Full details of breakdown by organisation/individual respondent type can be seen in Tables 37 and 38 in Annex A.

### **Question 12: Please explain your answer, including any alternative suggestions Those answering ‘yes’ to question 11**

Of the 85 respondents answering ‘yes’ to question 11, 70 provided further details in question 12. The number of respondents raising each issue is shown in the chart below (note respondents sometimes raised more than one).



**Figure 3: Q12 Issues raised by respondents answering 'yes' to Q11**



Source: Q12 explanation from respondents answering 'yes' to Q11; n=70

Forty-seven respondents agreed that the title 'supported accommodation for older children' was appropriate. A common reason given was that it differentiated between support and care, while being clear that support was required. A typical comment in this area is "the term is preferable to independent or semi-independent because the focus is on support and recognises that these young people are in need of and should be given an appropriate level of support" (Designated Nurse for Looked After Children). Others commented that 'unregulated provision' is a deficit term that describes what accommodation is not, rather than what is. Some respondents particularly approved of the use of the term 'older children': "I agree with this name because it gives clear intention that support is required, and we need to keep in mind that this age group are still children" (Director of quality in education and Children's social care sector).

Sixteen respondents suggested that an alternative name for this kind of provision should be used. For the majority, the issue was the term 'older child': 13 felt that 16/17-year-olds would prefer to be called 'young people' or 'young adults', with six respondents making the point that sometimes the same accommodation could be used for young adults.

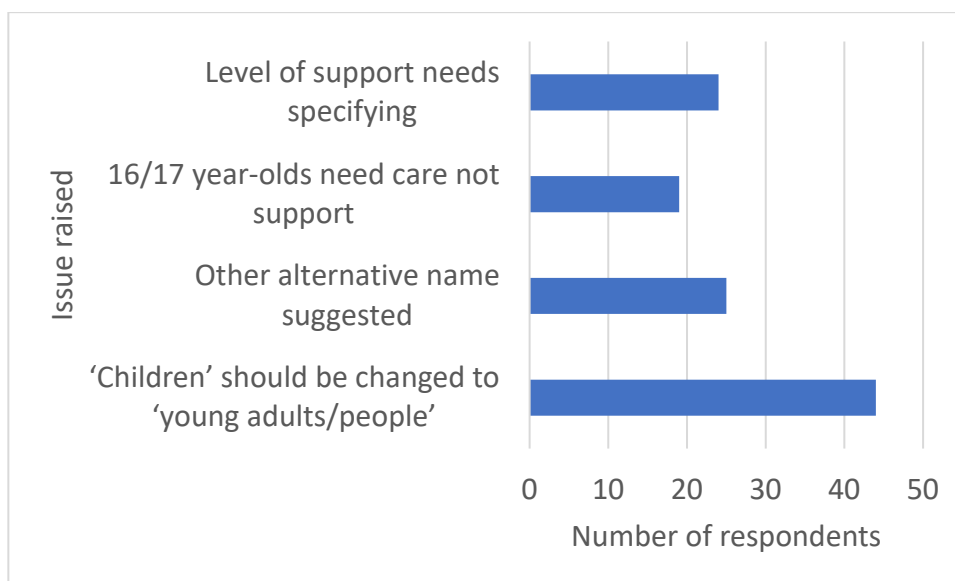
For 18 respondents, the concern was how far the proposed definition encompassed various types of provision: "within this high-level definition there may be a range of different types of provision relating to different levels of need for young people – within the definition it might therefore be useful for the range of different types of provision to be set out" (Local Authority). Two local authorities had particular concerns about the status of supported lodgings with one concerned that "supported lodgings could fall into this category and this is a different service" with, conversely, the other arguing that "it would need to be made clear that this definition also includes provision such as supported lodgings, to avoid confusion."

Finally, five respondents commented on the need to ensure that the standard expected of such accommodation should be clearly defined and nationally regulated.

### Those answering ‘no’ to question 11

Of the 83 respondents answering ‘no’ to question 11, 81 provided further details in question 12. The number of respondents raising each issue is shown in the chart below (note respondents sometimes raised more than one).

**Figure 4: Q12 Issues raised by respondents answering ‘no’ to Q11**



Source: Q12 explanation from respondents answering ‘no’ to Q11; n=81

Over half of respondents providing details in this category felt that the term ‘older children’ was misleading and potentially insulting or off-putting for 16–17-year-olds who would prefer an alternative such as ‘young people’ with many commenting that the latter is a term in wide usage and well understood. Many respondents also commented that the same provision might accommodate those older than 17 who were being supported into independence or who were entitled to support to age 25 and that, therefore, the term was misleading. Typical comments included:

“No, prefer the term ‘supported accommodation for young people’ - we know our 16/17-year-olds would not like to be referred to as ‘older children’ who they’d see as younger.” (Local Authority)

“Depending on level of need, 16- to 17-year-olds could reside in different supported living models, with young people up to the age of 25, of which supported accommodation is one such model.” (Local Authority)

Twenty-five respondents suggested alternative names for this type of provision (other than not using the term ‘older children’); in some cases, they suggested several names to

reflect the different types of provision that could be provided. However, there was very little consensus on what an alternative name might be. Suggested names are provided in Table 39 in Annex A.

The different suggested names for provision reflect the different types and purposes of accommodation that could potentially be covered by the definition with 24 respondents seeing this as an issue that needed clarifying. Supported lodgings and statutory provision for young adults were raised by a number, as well as how the type of support on offer would be defined and regulated. Comments included:

“...there has to be a clear line between semi or fully independent as the engagement level will differ. Both arrangements will home a specific profile of child and the Local Boroughs will need this flexibility of choice.” (Residential children’s home worker)

“I think there should be clear definition for sectors of support, due to the number of unregulated provisions without quality assurance it is essential that services are named appropriately to identify the service.” (Residential children’s home worker)

The concern of almost a quarter of respondents answering ‘no’ to Q11 was that 16- and 17-year-olds require care rather than support. Typical comments included:

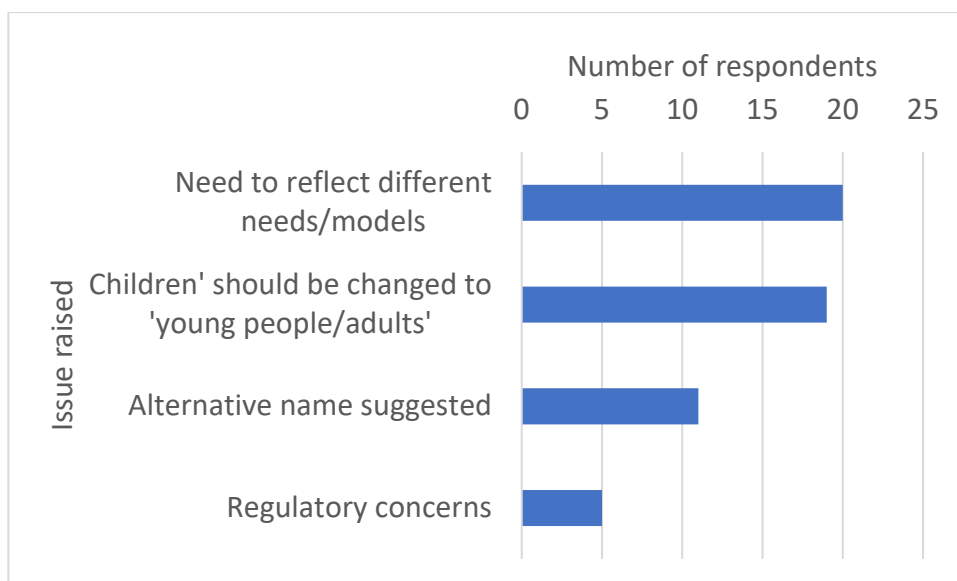
“The vast majority of children [are] in the care of the local authority due to abuse, neglect, sexual abuse and trauma they suffered in the care of their birth families and at 16 years old no child, let alone a child in care is able to support themselves semi-independently.” (Social worker)

“Children should be cared for. The reason they are looked after is because no one has done so and by just 'supporting' them only continues this theme.” (Residential children’s home worker)

### **Those answering ‘not sure’ to question 11**

Of the 45 respondents answering ‘not sure’ to question 11, 42 provided further details in question 12. The number of respondents raising each issue is shown in the chart below (note respondents sometimes raised more than one).

**Figure 5: Q12 Issues raised by respondents answering 'not sure' to Q11**



Source: Q12 explanation from respondents answering 'not sure' to Q11; n=42

Almost half of respondents (20 of 42) had concerns around the extent to which the proposed name and definition would encompass or distinguish between different types of provision. One respondent (provider) wrote “I struggle to see how certain supported accommodations can be grouped together e.g., supported lodgings is completely different in needs/provision than a block contract semi-independent provision.” Others raised the difference between leaving care provision and foyer/hostel type accommodation with young people older than 18 in residence, while others commented that some provision caters for 16–25-year-olds. Several others described the continuum of care and support that could be provided depending on need. This seemed to be, for a small number of respondents (5), linked to issues around regulation and standardisation. Most argued that the standards which apply to different forms of provision need to be clearly stated and applied but expressed concerns about exactly which forms of provision would be included in the definition.

Almost half of respondents raised the issue of using the terminology ‘older children’ and suggested alternatives such as ‘young people’, ‘young adults’ or ‘16-17-year-olds’. Around a quarter suggested other alternative names – see Table 39 in Annex A.

## Question 13: Please provide examples of the types of independent or semi-independent provision that exist in the sector

Q13) Please provide examples of the types of independent or semi-independent provision that exist in the sector.

This question elicited a wide range of responses based on different interpretations of what was being asked, which has made analysis challenging. A text box accompanying the consultation question asked four further questions about provision, support provided and the features of current provision that respondents wished to retain or to dispense with. A minority of respondents answered these questions separately (predominantly local authorities); some included responses to one or more of the supplementary questions in their response without separating them; still others simply listed a whole range of provision without explanation of what this entailed, or the kind of support provided; other respondents listed types of support without linking them to specific types of provision. Many stated that support was designed to meet the needs of the young person regardless of the type of accommodation in which they were placed. Some respondents listed only the kind of provision or support they themselves provided whereas others listed provision that they were aware of, whether or not they had first-hand experience of that provision type. Local authorities were inclined to list all of the provision that they commissioned, although not usually with the numbers of young people in each.

### All respondents

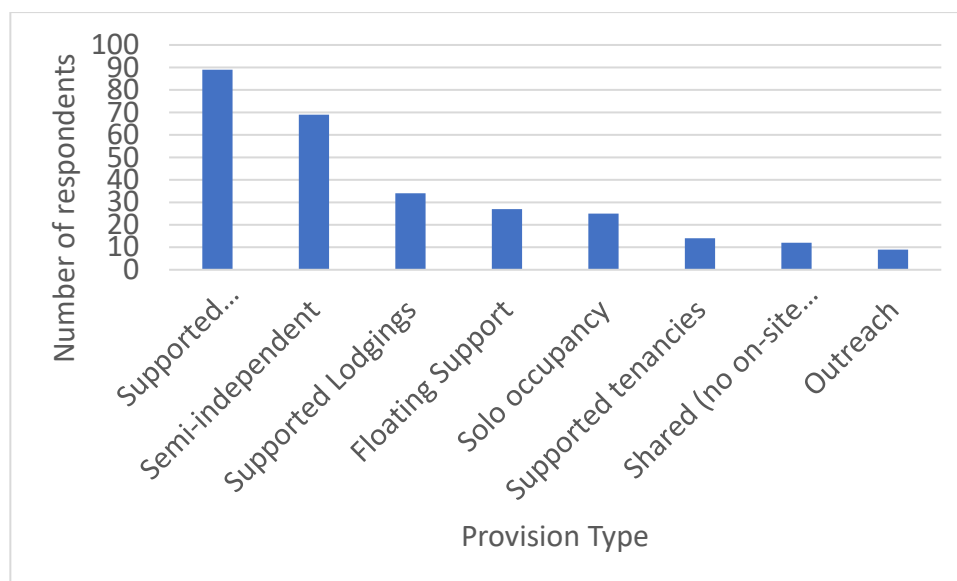
In all, around 40 provision examples were given by 202 respondents, the majority of whom provided multiple examples. It was often clear from descriptions that different terms often meant the same thing and, conversely, the same terms meant different things to different people:

“Semi Independent, Semi-Independent supported living, 16+ provision, 16+ accommodation and support. It depends on which local authority we are working with as they all have different definitions and names for the contracts we work under.” (Provider)

“Supported Accommodation though some professionals refer to it as Semi-Independent Living.” (Local Authority)

The chart below shows the provision types mentioned most frequently.

Figure 6: Q13 provision types



Source: responses to Q13; n=202

The most commonly cited example of provision was Supported Accommodation (also often called Supported or Group Living) (n=89). For most, this included some form of live-in support, but for others the amount of support available could vary considerably with categories of support provided depending on the needs of the young people living there:

“Supported accommodation for young people (high/intensive = 24/7 service for young people with complex needs, Medium = daytime support and access to out of hours support, Low = visiting support, no staff based at the accommodation).” (provider)

The next most common term (n= 69) was Semi-independent. For some this seemed to be a catch-all term, with supported accommodation falling under that general heading as a type of semi-independent provision; for others, there seemed to be a distinction between the two forms of provision, but it was not always clear what that distinction is:

“Authorities distinguish semi-independent provision (expect 24-hour staffing) and supported accommodation (minimal support needs typically 3 to 6 hours per week, but much more however if more complex needs).” (Organisation, Other)

“Semi-independent or supported accommodation - the terms are used interchangeably.” (Local Authority)

Supported Lodgings was the next form of provision most frequently mentioned (n=34) and here there seemed to be more clarity about the nature of this provision. However, Host Families were also mentioned by three respondents, and it is not clear how this differs (although two of the three respondents mentioning Host Families said they also used/provided Supported Lodgings so there appears to be a distinction).

Floating Support was mentioned by 27 respondents, although often as an adjunct to other forms of independent or semi-independent provision. Outreach support was mentioned by nine respondents. Again, the difference between outreach and floating support is not clear.

Providing young people with single occupancy accommodation was given as an example by 25 respondents, often with mention of floating support. Supported tenancies were cited by 14 respondents and shared accommodation without on-site support by 12. All other forms of provision were given as examples by fewer than ten respondents. A full list of provision cited can be found in Table 40 in Annex A.

Fewer respondents provided clear answers to the supplementary questions on positive and negative features of current provision. Local authorities were more likely to answer this than other types of respondents and we have discussed their responses separately in the section below. Providers were inclined to see the positive aspects of their own provision as being caring, responsive and tailored to the needs of the young people they accommodated and/or supported. Other organisations cited examples of good provision they were aware of, although there was little commonality in the small number of examples given.

There were different interpretations of what was being asked in the supplementary question which asked about negative aspects; some took this to mean negative aspects of their own provision where they tended not to identify any. Others took a broader view of what the question was asking and the predominant concern here was funding; a significant number thought commissioners were inclined to prioritise cheaper provision over quality provision better suited to young people's needs and/or drive down fees that left providers struggling to provide the quality needed. Short-term placements were also a concern here. Those providing supported lodgings saw the switch from housing benefit to universal credit causing problems with being able to pay sufficient rent. A small number of providers were concerned about the term 'unregulated' as they felt this gave a negative view of the sector. Some providers and other organisations and charities raised concerns about the poor quality of some provision.

### **Local authority responses**

We understand that the DfE is keen to understand which types of provision are the most common and the kind of support typically provided with each. The first of these is likely to be especially challenging as: this is a self-selected sample in which providers and individuals generally only commented on provision they are involved with; no definitions seem to exist for different provision types and so some terms seem to be used interchangeably whereas others mean different things to different people; frequency of naming provision is not necessarily synonymous with the numbers of young people accommodated (for example, respondents might mention supported accommodation and emergency accommodation, with the former accommodating a significantly higher

number). Understanding the support provided in each type of provision is also challenging since, as well as differences in nomenclature, many respondents did not provide this information or said that support was not linked to accommodation type.

As noted above, local authorities often (although not universally) provided more detailed responses to the question than other respondent types, including the supplementary questions. As commissioners, they are also likely to have a wider view of the range of provision available. We therefore undertook a separate analysis of local authority responses (n=50) to explore provision types and support.

The types of provision that local authorities said they provide or commission, plus frequency, is given in Table 6, with the caveats that we do not know how many young people are accommodated in each type and that different names may be being used to mean similar types of provision:

**Table 6: Provision type cited by local authorities**

<b>Provision type</b>	<b>Number</b>
Supported lodgings	20
Supported accommodation	20
Semi-independent	16
Supported living	5
Solo provision	4
Shared accommodation	4
Tenancies	3
16 plus provision	2
Foyer	2
Shared lives	2
Housing Related support and accommodation	1
Bespoke arrangements	1
Crash pads	1
Emergency accommodation	1
Group living as a type of semi-independent	1
Group supported accommodation	1
High intensity	1
High needs	1
High support semi-independent	1
Housing Related Support Funded Supported Accommodation Provisions	1
Independent flats	1
Lead worker support	1
Low lodgings	1
Night and Day stops	1
Safe base	1



Semi-supported	1
Single occupancy supported accommodation	1
Staying close	1
Supported and Independent Living Services (SallS)	1
Supported Living Plus	1
Supported shared accommodation	1
Supported tenancies	1
Supporting People Young People's Accommodation	1
Training flats	1
Transitions Centre Service	1
Volunteer host service	1
Xroads	1
Youth hub	1

Local authority responses to Q13; n=50

Of all setting types, supported lodgings are the most consistent in terms of the description offered, with young people staying in family homes. However, at least one local authority suggests this is a short-term placement, whereas others suggest that young people could be accommodated for longer periods. Some local authorities suggest that young people in this kind of provision will have fairly low-level needs and will just need support towards independence, whereas others suggest young people could have fairly complex needs.

Supported accommodation seems to be a name given to a wide range of provision which can be sub-divided into different categories by local authorities describing either different types of accommodation (shared, solo etc.) or different levels of support (24/7, floating etc.) or both. For some local authorities, semi-independent seems to be a sub-set of supported accommodation, although for others, the reverse is true. Semi-independent accommodation is equally as varied in terms of accommodation type and levels of support that can be provided and there is nothing in the descriptions given that allows us to determine the difference between the two (if any exists).

Solo provision also seems to be a term that is used in some local authorities to mean intensive one-to-one live-in support for young people with complex needs, whereas in others, it is (similar to tenancies) to be for young people close to independence who receive floating support. Equally, supported living varies between local authorities to mean a degree of support for those predominantly living fairly independently and short-term emergency care for young people with complex needs.

Other types of provision just referenced by one or two local authorities often seem to be different names for similar things (e.g. emergency accommodation) or specific names for a subset of provision/support that, in other local authorities, comes under the umbrella terms of supported or semi-independent accommodation. Table 41 in Annex A sets out

the range of descriptions provided by local authorities for different provision types, including support provided, but it can be seen that there is very little agreement on definitions.

The accompanying supplementary questions asked what aspects of current provision respondents wished to retain. This was answered by comparatively fewer respondents. Some local authorities listed the terms of their current framework arrangements in full detail, saying that they wished to retain these. These tended to cover a range of things including staff qualifications and experience, accommodation standards and policies and procedures. An analysis of different framework provisions (perhaps accompanied by interviews with local authority staff to understand which were most valuable or challenging) could help inform national standards. For the most part, local authorities stressed that it was important that the proposed national standards do not prevent them from being able to source a wide-range of provision types, along with support packages that are sufficiently flexible to meet the highly varied needs of older children, including the ability to taper support as they move towards independence.

The supplementary questions also asked what respondents would like to change about the current provision – invariably, respondents wished to be able to remove poor quality provision.

## Questions 14 and 15: Are there examples of where it would be appropriate to place a looked after child or care leaver aged 16 or 17 in a setting that does not deliver any care or support?

Q14) Are there examples of where it would be appropriate to place a looked after child or care leaver aged 16 or 17 in a setting that does not deliver any care or support?

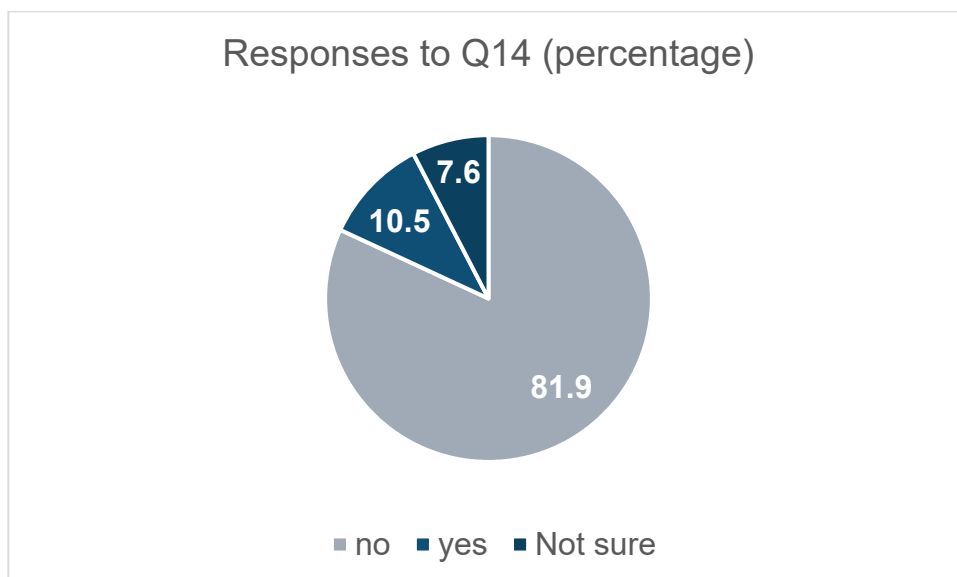
Q15) Please explain your answer

These consisted of a closed question, followed by an open one that asked respondents to explain their answer.

### Question 14: Are there examples of where it would be appropriate to place a looked after child or care leaver aged 16 or 17 in a setting that does not deliver any care or support?

This was answered by 210 respondents. Overwhelmingly (n=172), respondents thought that it would be inappropriate for 16 or 17 year-olds to be in a setting that did not deliver care or support with only 22 feeling that this could be appropriate in some circumstances.

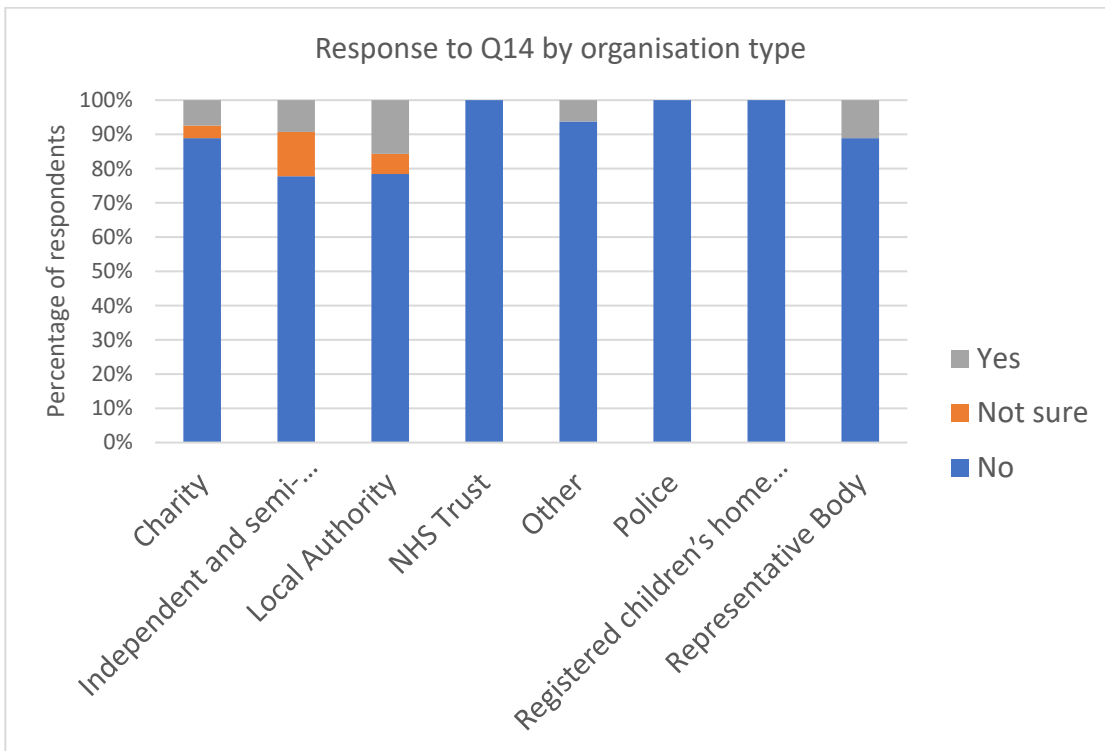
**Figure 7: Responses to Q14 Are there examples of where it would be appropriate to place a looked after child or care leaver aged 16 or 17 in a setting that does not deliver any care or support?**



Source: responses to Q14; n=210

Of the 164 responses that came from an organisation, 134 felt it was inappropriate for 16- and 17-year-olds to be placed in a setting without care or support with 17 responding that it could be appropriate and 13 unsure. Those answering 'yes' were predominantly from local authorities (n=8) and providers (n=5).

**Figure 8: Are there examples of where it would be appropriate to place a looked after child or care leaver aged 16 or 17 in a setting that does not deliver any care or support? Response by organisation type**



Source: response to Q14; n=210

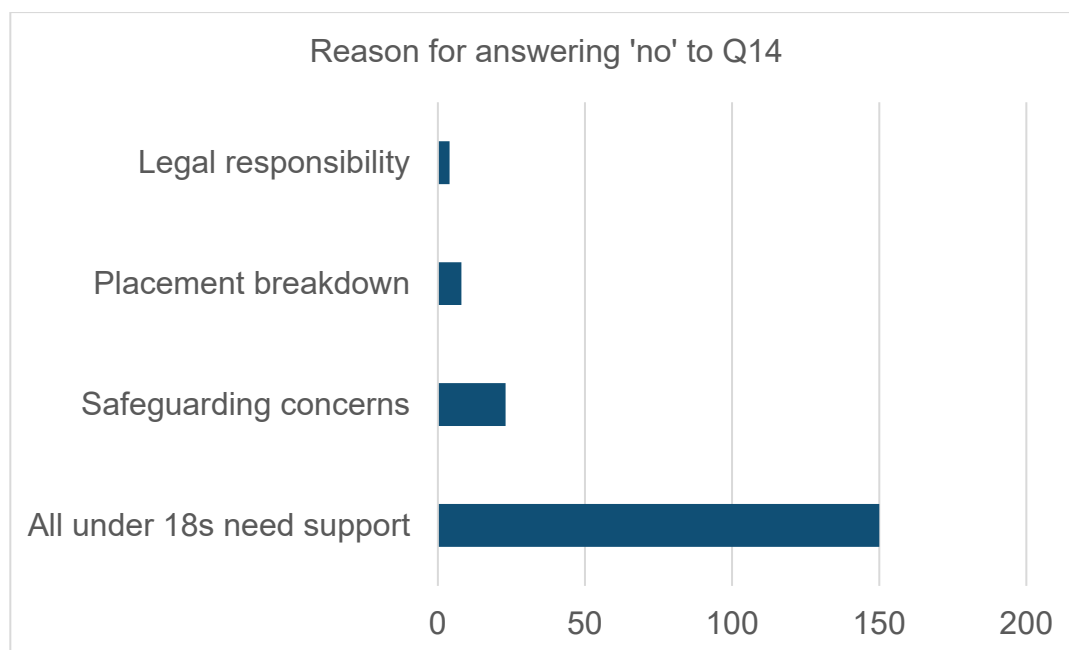
There was no discernible pattern in those responding as individuals in terms of how they described themselves, with no more than one individual responding 'yes' it might be appropriate to place 16- and 17-year-olds in settings without care or support.

## Responses to Q15: explanation of response to Q14

### Those answering 'no' to question 14

Of the 172 respondents who said that it was not appropriate to place 16- and 17-year-olds in settings without care and support, 162 explained their reasoning.

**Figure 9: Q15 Reasons for answering 'no' to Q14**



Source: Q15 respondents answering 'no' to Q14; n=162

Of these, the overwhelming majority (n=150) said that this was because 16- and 17-year-olds are not fully adult and would necessarily require a degree of support:

“I can't see many scenarios where there would be a 16- or 17-year-old living in somewhere new that didn't need any support whatsoever. Or that they wouldn't at least benefit from some support even if it wasn't an urgent need.” (Charity)

“Young people are still experiencing adolescence at this age and finding their own feet. They have no concept of bills and daily living skills that are particularly associated with living alone and rely heavily on support staff.” (Independent / semi-independent accommodation worker)”

While some respondents commented that support and care needs differed, it was important that support was in place to help young people make the transition to adulthood and to respond to problems as they arose:

“All 16–17-year-olds whether in care or not need to be provided with care and support in some form. The level of care and support will vary depending on the circumstances of the child. But the child can only grow and develop if they know that the care is there for them if they need it.” (Charity)

Other respondents made the point that 16- and 17-year-olds of any background do not usually live without support from family and carers and that looked after children are a group that have likely experienced the kind of traumatic background that makes them in need of more, rather than less, support:

“However able a young person is, managing alone is hard for anyone, let alone a child that has been taken into care as they are often disadvantaged through their situation in terms of education and skills in relation to their peers.” (Independent and semi-independent provision provider)

“Young people in care and care leavers aged 16 or 17 will have a history of trauma, vulnerability or complexity which requires them to be suitably supported.” (Local Authority)

Of those responding, 23 raised the issue of safeguarding arguing that, without some form of regular contact, vulnerable young people were at risk:

“The risk of exploitation and or harm would be so high I would not feel that this would be an ideal situation for any 16/17-year-old.” (Independent and semi-independent provision provider)

A small number of respondents (n=8) felt that leaving young people without care or support was more likely to lead to placement breakdown:

“Referrals to our supported lodgings service are significantly populated with 16/17 year olds and 18 year old former Looked After Children who were given 'independent' accommodation with minimal or no support and have come back through the homeless services when that accommodation has broken down.” (Charity)

A small number of respondents (n=4) noted that providing support was a legal duty of the local authority.

#### **Those answering ‘yes’ to question 14**

Of those who responded that it could be appropriate to place 16- and 17-year-olds in settings that did not provide care or support, 19 provided more details. Of these, most (n=13) made it clear that this would only be appropriate for a small number of young people:

“Sometimes it is appropriate for some 16/17-year-olds to live independently. This can be based on their previous experiences such as those YP who have already been doing a lot of the 'home items' on their own, or those that have had a very good foster placement etc that has taught many of the independent living skills.” (Local Authority)

Eight respondents made the point that, even where on-site care or support was not provided, it was important that 16- and 17-year-olds living independently had access to other forms of support such as family support, flexible off-site support and signposted

universal support. One respondent commented on the importance of providing young people with the stability of a bed, even where they choose not to engage with support.

### **Those answering 'not sure' to question 14**

Only nine respondents in this category gave an explanation. Of these, six said that they had not experienced a situation in which 16- and 17-year-olds were not provided with some degree of support, although this may not always be on-site. One felt that support in some form would always be needed by this age group. A Local Authority felt that this should only be the case for short-term emergency placements. One respondent was uncertain what the definition of support was:

“It very much depends what the definition of support is - they will not be without the support of their corporate family (social worker, PA etc) they may be working, in full time education etc. The support of family, a wide range is available - some "paid" support, some less formal, unpaid.” (Local Authority)

## **Question 16: Are the proposed national standards missing anything that you would expect of any provider of independent and/or semi-independent provision**

Q16) Are the proposed national standards missing anything that you would expect of any provider of independent and/or semi-independent provision? - Please explain your answer

There were 199 responses to this question; however, of these 79 responses either stated that there were no missing elements or did not attempt to answer the question and so were excluded. Of the 120 remaining responses, there was often little consistency even where responses touched on similar areas. Many responses contained a fairly lengthy list of areas where respondents felt the standards were lacking – in many instances, respondents simply provided a list of standards that were used in their locality, some of which were not matched by the proposed national standards<sup>3</sup>, although they did not always say why they felt these things should be included.

We have attempted to group these responses into themes; where more than one respondent made a similar point, we have indicated the number in brackets.

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<sup>3</sup> The draft national standards were provided in 'Introducing national standards for independent and semi-independent provision for looked-after children and care leavers aged 16 and 17' Annex B: [https://consult.education.gov.uk/children-in-care-and-permanence/introducing-national-standards-for-unregulated-pro/supporting\\_documents/National%20standards%20consultation.pdf](https://consult.education.gov.uk/children-in-care-and-permanence/introducing-national-standards-for-unregulated-pro/supporting_documents/National%20standards%20consultation.pdf)

There was no one area in which respondents agreed that standards were missing, with the issues raised by the highest number of respondents being:

- **Relationship with standards for children's homes:** ten respondents argued that the standards should simply be the same as those for children's homes. Conversely, two respondents felt that the proposed standards were too akin to those for children's homes and do not have the flexibility needed for the sector.
- **Staff recruitment and training:** Including more detail on qualification and training requirements for staff, including setting minimum requirements (n=13); a requirement for Safe Recruitment practice (n=5); and minimum qualification requirements for management and leadership roles (n=3). Some asked for more clarity on whether the proposed standards would apply to subcontractors and hosts of supported lodgings.
- **Placement decisions:** six respondents commented on the need for the standards to be specific about requirements for pre-placement visits and interviews with the provider, including the involvement of partner agencies. Three respondents commented that the standards should include a requirement about matching young people to the placement, including the suitability of provision and compatibility with other young people in the provision. Two wanted a requirement that providers prioritise local young people when offering placements.
- **Support requirements:** this was the area which gave rise to the most comments; those raised by more than one responded were:
  - the Statement of Purpose/Intent should include how the provider will ensure the young person is at the centre of the support and that their voice will be heard (n=11);
  - the support element should include a requirement on how providers will support young people to transition to independence (n=9);
  - accommodation should provide support for physical, emotional and mental health, including trauma and the impact of abuse or neglect (n=8);
  - it should be a requirement that support is clearly specified and provided (n=5);
  - requirements should include something on kindness, compassion and love (n=4);
  - providers should be required to have processes in place for supporting young people's access to local services and community integration (n=4);



- stronger recommendations needed around promoting appropriate and safe relationships with family and friends, rather than that young people are "enabled to maintain" (n=3);
  - providers should establish positive relationships with young people (n=3);
  - minimum support requirements should be nationally specified, not just 'appropriate arrangements' (n=3);
  - should include helping young people to access education, employment or training (n=2).
- **Governance, policies and monitoring:**
    - The standards should specify the policies and procedures each setting is expected to have (e.g., safeguarding, equality and inclusion, data protection and information sharing, whistleblowing, drugs and alcohol, staff appraisal and supervision) (n=10);
    - further clarification is needed on notification of harm with concerns that the definition is too narrow and should include missing persons (n=8)
    - four respondents thought that the ownership of provision should be regulated, including requirements for transparency of ownership, with the same number thinking that settings should also provide clear governance and accountability structures. This should also be accompanied by a clear complaints and resolution process (n=3);
    - fees should be regulated (n=3).
    - There should be a requirement that providers notify Local Authorities when they set up in their area and engage with local monitoring arrangements (n=2) along with a mechanism for provider feedback to the local authority (n=2).
  - **Inspections:** clearer requirements needed about the nature and frequency of inspections (n=9).
  - **Safeguarding, risk and multi-agency working:** there should be more about risk management and multi-agency working and information sharing if a young person frequently goes missing or is at risk of harm or of harming others (n=7) and requirements for working in partnership should be strengthened (n=7).
  - **Accommodation:** eleven respondents commented on the need to strengthen requirements in respect of the standard of accommodation provided. One thought

that the standards should require working locks on bathroom doors, three thought that good WIFI throughout the provision should be a requirement and three thought that that the standards should ensure young people's privacy. More generally, ten thought that the standards should require that properties were well-maintained, comfortably furnished and 'homely.'

## Question 17: Are there any elements of the proposed national standards that you think would be difficult for providers to implement?

Q17) Are there any elements of the proposed national standards that you think would be difficult for providers to implement? - Please explain your answer

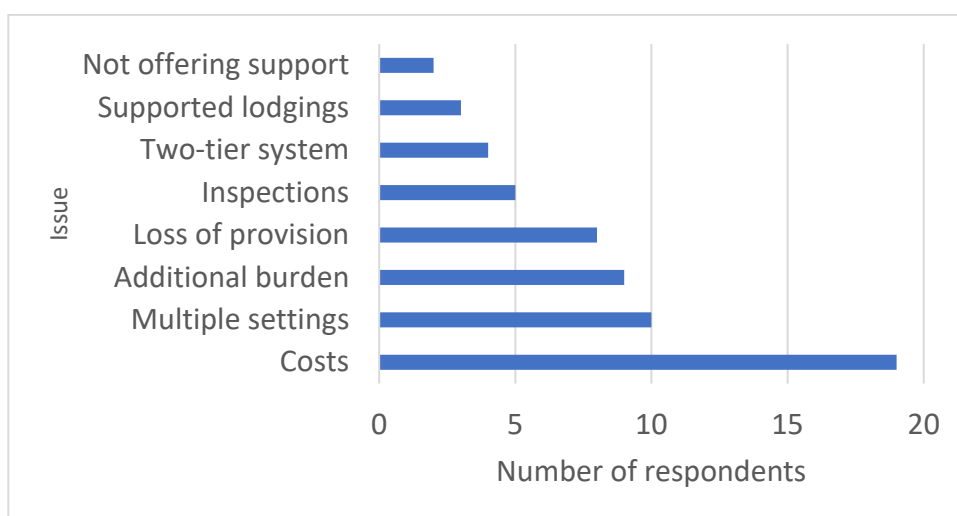
This question was answered by 183 respondents. A significant proportion answered 'No'. A few of those answering 'no' expanded on their response, with the majority of those saying that this was what happened in their setting/locality already. Removing these and a small number of respondents whose response was not relevant to the question, 89 respondents thought there would be one or more elements that would be difficult to implement.

Where people did respond to the question, some provided a more general response about issues such as capacity and costs or identified particular types of provision as being most likely to experience difficulty. Others did identify particular aspects of the proposed standards that they saw as likely to be problematic (although in some instances this was more about lack of clarity).

### Wider issues

The follow chart shows the issues raised by respondents that were not linked to specific standards:

Figure 10: Response to Q17 Wider Issues



Source: responses to Q17; n=183

The most common issue raised by respondents under this heading was the impact of the proposed standards on costs (n=19), linked by many to a perceived regulatory burden (n=9) and a concern over subsequent loss of provision (n=8):

“We anticipate that a robust application of these sorts of standards will drive a number of providers (especially the smaller ones) out of the market due to the cost of meeting and evidencing them, and the inability to recruit any additional staffing that may be required. This is likely to reduce the availability of semi-independent provision, reduce sufficiency and place more young people at risk by the removal of this resource from the market resulting in young people being placed in unsuitable accommodation e.g. B&B. A similar worry is that some larger not for profit providers see additional business risk in having to meet additional requirements and may leave the sector. We do not want to discourage the not-for-profit sector” (Local Authority).

A particular concern of ten respondents was how the standards would apply when providers operated across multiple properties, some of which might be very small and/or short-term. This could cause problems in terms of the flexibility of provision if individual properties were to require registration and if a manager per property was required:

“There is some confusion for us over the following: 'Each individual service must have an allocated person who is accountable for all elements of service delivery.' We have a service manager who over sees all homes, plus allocated social workers responsible for an allocated number of cases. We do not have one manager per home, and are unclear if this is the suggestion in the proposed standards. If this is indeed the suggestion, in our view this would be most difficult for providers to implement, and detrimental in parts to service operation” (Independent and semi-independent provision provider).

Inspection was an issue raised by five respondents, in part linked to the above and the concern that those with multiple small accommodations would need to also have multiple inspections and the regulatory burden this would create. Two respondents raised issues about the capacity of inspectors to carry out multiple property visits for inspection purposes.

Three respondents raised the issue of supported lodgings as being particularly difficult to fit to the proposed standards as these are in the private and voluntary sector. Respondents felt that this would raise particular problems around qualifications of staff, location assessments, accommodation standards and the requirement for an accountable person responsible for all aspects of delivery and whether this relates to the placing local authority or to the Host family.

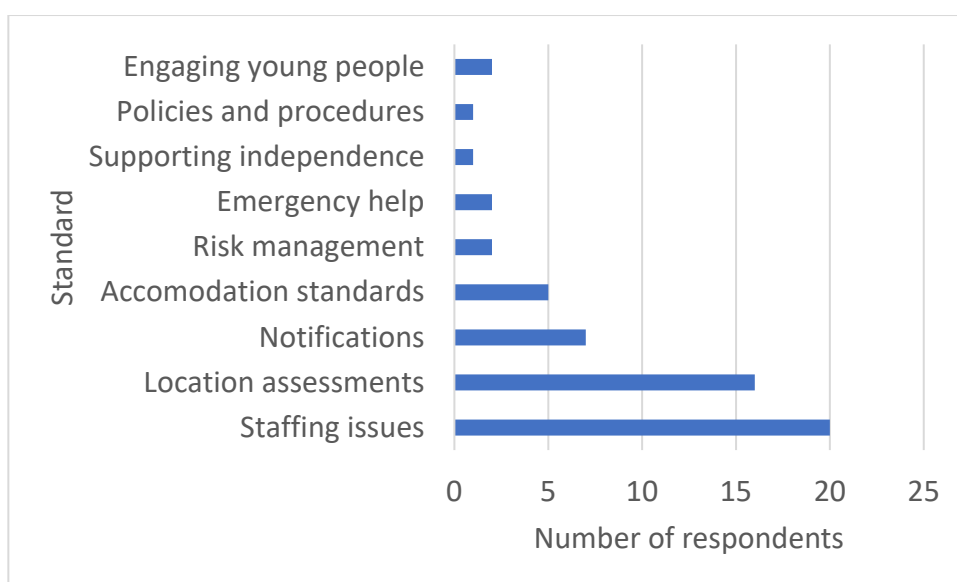
Additionally, two respondents noted that sometimes providers of accommodation were not the providers of support and questioned how the standards would be applied in those circumstances.

Another concern of three respondents was how the new standards would apply to provision that catered for young people 18 or over as well as 16 and 17 year-olds: “Would we have to work against 2 frameworks, one as a regulated body for those aged 16/17 and then a different framework for those aged 18+” (Supported Housing (Charity)?

### Standards likely to be difficult to implement

The most problematic standards, according to respondents, were those related to staffing requirements, particularly qualifications, and how location assessments might impact on the cost, availability and flexibility of different forms of provision:

**Figure 11: Q17 Standards seen as problematic**



Source: responses to Q17; n=183

**Staffing requirements.** The requirements around staffing were those most likely to be problematic according to 20 respondents. For six respondents this was to do with uncertainty about the requirements:

“... staff should have ‘the qualifications to meet the needs of each child’. It is unclear what the required minimum qualification should be and therefore this could lead to a lack of understanding around the type and level of qualification required by staff (Organisation; other).”

Another two raised the issue of the requirement to have a registered manager and the costs of this, including training and increased competition for staff, as well as potential shortages. More generally, 13 respondents raised the issue of the recruitment market

being unable to cope with demands for more qualified staff, noting existing challenges for recruitment and retention and what would happen to experienced but not qualified staff, with several also noting the implications of this for costs.

**Location assessments.** Requirements in this area were cited as problematic by 16 respondents. For one this was to do with reducing current flexibility:

“While we could get all the addresses checked before we put them onto the local framework, one of the huge benefits of our model is that we can be flexible. So, for example, if a particular property is a target for unwanted attention - from criminals e.g. child sexual or criminal exploitation, county lines, cuckooing - or from neighbours, we can re-assign that property to a different project, and move the young person to another property. Currently, we can do this very quickly - which is paramount in preventing further risk to the young person - as we only need to get approval from social care (who of course know their patch very well.) We strongly feel that this flexibility is vital to the success of the service that we provide (Supported housing provider).

Another three respondents commented that affordable areas were often those with higher crime rates and poorer community facilities so that this could gain act as a driver for increased costs. One respondent felt the proposals did not take into account the need to respect the wishes and preferences of the young people being placed. Two respondents wondered what the implications would be for existing provision: “we can’t move our buildings.” Related administrative burdens were cited by four respondents; two felt the requirement should be that one document for all properties would suffice, rather than separate ones for every property in the area. Another noted that “having to do location assessments for each home used in dispersed schemes, such as Nightstop and supported lodgings, would add a considerable regulatory burden to these services” (Independent and semi-independent provision provider). Two providers felt feasibility would depend on the cooperation of local police which one had found to be variable, while a local authority argued that there needed to be more clarity on the role of the police.

**Notifications** were seen as problematic by seven respondents. Two respondents thought that the use of the word ‘suspected’ would lead to a large number of routine notifications being sent, while two others also commented on the likely volume of referrals. A local authority wondered if this was proportionate and manageable, suggesting instead referral to the local authority who would decide whether to notify Ofsted. The definitions of ‘serious’ and ‘relevant person’ were questioned by two respondents.

**Accommodation standards** were raised as an issue by five respondents. One commented that the creation of a homely type environment would be difficult for foyer type accommodation, with another wondering how these might apply to Host schemes

such as Nightstop. One noted that many semi-independent homes were governed by HMO (Houses in Multiple Occupation) regulations and wondered whether both sets would now apply. Who would do the checks and how costs would be met was raised by one respondent. Another felt that requirements should be more realistic:

“e.g. in some of the self-contained flats, there would not be fire doors on bedrooms, but all properties would have smoke and carbon monoxide detectors which we test weekly with young people. We would not be doing a full fire drill every week with a young person living alone, but we do a fire safety walk through and life skill qualification with all young people” (Independent and semi-independent provision provider).

**Other standards** were raised as problematic by only one or two respondents. These included difficulty in engaging some young people who would still need to be accommodated; an overly cautious approach to managing risk when also trying to support young people to become independent; difficulties for small providers in developing policies and procedures; and two were uncertain about the requirements for emergency help and whether this would be satisfied by ensuring young people had access to external services or meant 24/7 staff on call.

## **Questions 18: Which elements of the proposed national standards do you expect would carry the most significant costs and 19: How much do you expect the costs of provision to increase by if these national standards are introduced?**

Q18) Which elements of the proposed national standards do you expect would carry the most significant costs?

Q19) How much do you expect the costs of provision to increase by if these national standards are introduced? - Please explain your answer, providing estimates of cost where possible

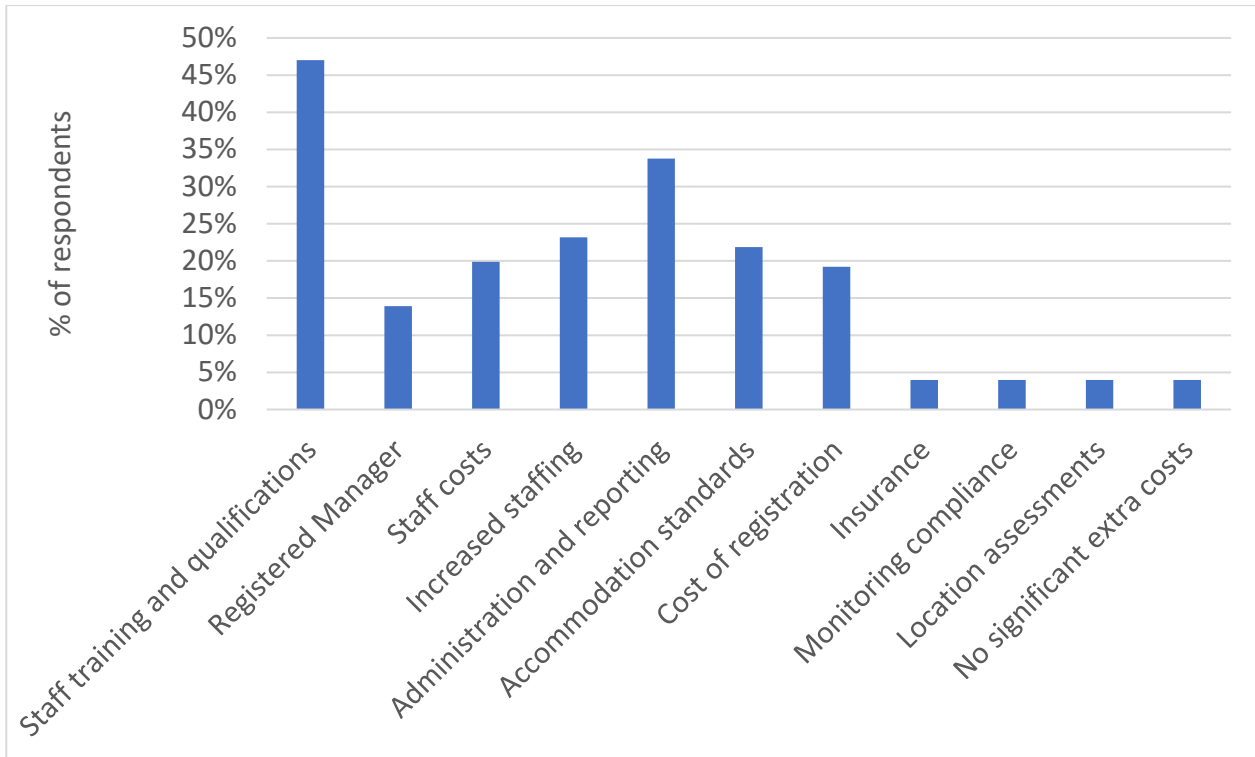
These were both open questions. While responses to the first of these were fairly clear, responses to the second were widely varied and difficult to quantify. We assume that this question relates to any likely increase in the cost of placements but respondents often did not interpret it this way. Some respondents gave a percentage increase (often a range) but were frequently unclear whether this would translate into an equivalent increase in placement charges, whereas many others provided a figure (for example, £250,000). It was not always clear whether this figure related to an initial outlay (for example, to improve accommodation) or annual additional expenditure; even where respondents stated that this was likely to be an annual sum, this could not be translated into potential placement cost increases without additional information. Others provided figures for revised average costs of placements (per week or year) but without stating what they had been previously. Some local authorities interpreted this as being about their own administrative costs, others about provider costs likely to be reflected in fees. Many others felt that more information was needed to be able to put a precise figure on cost increases.

### **Question 18: elements of proposed standards carrying most significant costs**

This question was answered by 151 respondents after excluding for those answering 'not sure' or similar and those not responding to the question. Six respondents thought that there would be unlikely to be any significant additional costs. However, a significant proportion of respondents identified several areas where they thought costs would rise, often interrelated.



**Figure 12: Standards expected to carry the most significant costs by percentage of respondents**



Source: response to Q18; n=151

Costs related to staffing were cited by the greatest number of respondents. Almost half of respondents (n=71) thought that staff needing additional training and/or be supported to achieve qualifications would be the most significant. Other costs were cited with employing additional staff (n=35), with many mentioning having staff available 24 hours driving this). Staffing costs were likely to rise according to 20 per cent of respondents (n=30) as the need to employ and retain more qualified staff would drive up wages. Additionally, the cost of employing registered managers (especially if these were required for each separate site) were seen as a significant additional cost by 21 respondents.

“We expect that the biggest additional costs of the proposed national standards will relate to staff and training costs. As mentioned above, if staff were required to complete specific qualifications, then this would incur significant costs to enable staff to complete these courses. The level of this cost would of course depend of what type and level of qualifications the Department required staff to have. Another aspect to consider is that some of our Service Managers currently cover a number of sites. So if under the regulations an allocated person was required for each individual site, then initial costs would be even higher” (Charity).

Over a third of respondents (n=51) saw administration and reporting costs rising significantly as a result of the proposed standards. This was partly increased paperwork as a result of ensuring compliance, as well as managing monitoring visits and overseeing

increased checks. For some, the need to separate arrangements for 16 and 17 year-olds from those for older young people would add to the likely administrative costs.

Over a fifth of respondents (n=33) thought the costs of meeting the accommodation standards would be significant. This was especially problematic, according to some respondents, for houses of multiple occupancy where standards of accommodation tend to be lower than in children's homes:

“The cost of the accommodation in a supported provision may actually cost more [than in a children's home] e.g. a washing machine in each 'flat' a cooker in each 'flat', maybe separate boiler and heating systems in each 'flat' where a children's home only needs one” (Responsible Individual of a Residential Children's Home Organisation).

“Lockable bedrooms – Although adding locks to all doors will not be costly, the unintended knock-on impacts e.g. potential to then require separate TV licences for each room could be costly” (Local Authority).

The cost of registration fees was cited by almost a fifth of those replying to this question (n=29), although many also stated that the costs were, as yet unknown. A particular concern raised by several correspondents was the issue of whether they would need to pay registration fees for each separate property.

Other potential costs (each raised by n=6 respondents) were additional insurance, location assessments (principally to do with needing to source provision in more expensive locations) and, for local authorities, the costs of monitoring compliance.

### **Question 19: likely cost increase**

Respondents generally found it difficult to give any idea of cost increases and, where they did, it was often difficult to determine what the figure provided related to (per child, per setting, per week etc.). Of the 141 who replied, 30 either said they had no idea or the answer given was not relevant to the question. A further 67 said that costs would rise but they were unable to give an indication of by how much. Two thought that providers would use the opportunity to raise costs more than necessary, while 11 thought cost increases would be minimal. A further respondent said that local authorities would be able to prevent cost increases.

Of those that quantified their response (n=30), these varied widely between no or minimal additional costs and a doubling of current costs. Some gave percentage increases while others gave actual figures, but it was often difficult to understand the basis of these (for example, whether they applied per provider, setting or child, whether they represented one-off, annual or weekly costs). Table 7 attempts to capture these responses:

**Table 7: Response to Q19, anticipated cost increase**

<b>Increase</b>	<b>Number of respondents</b>
Up to 10%	8
10 - 20%	3
20 - 30%	4
30 - 50%	4
90 -100%	2
£300 per week	1
£1,200 per week	1
£100,000 per annum	1
£150,000	1
£2,500 pw per child	1
£40,000 per child, per year	1
£750 to £2,300	1
£21,000 per annum	1
£1,000 per week per child	1

Respondents who quantified their responses to Q19; n=30

The highest number of respondents thought that the cost would likely rise by up to 10 per cent, although in number terms, this was only eight respondents. For those providing actual figures, it is generally unclear whether this related to revised actual costs or the anticipated increase in fees (or both).

## Questions 20 and 21: Ofsted-led registration and inspection: model 1

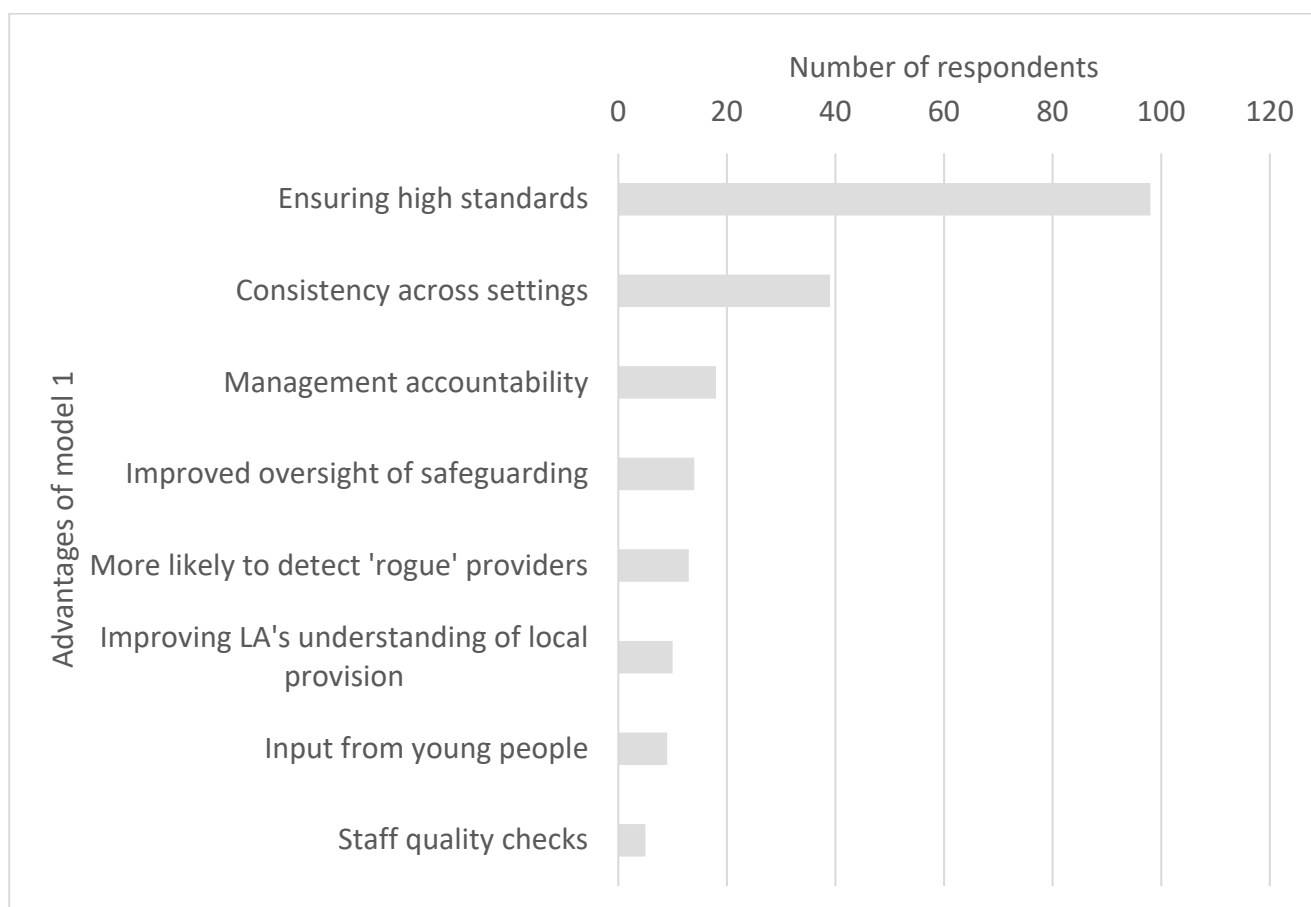
Q20) What do you think the main advantages would be of a model where Ofsted registers and inspects at individual-setting level (model 1)?

Q21) What do you think the main disadvantages would be of a model where Ofsted registers and inspects at individual-setting level (model 1)?

### Question 20: the main advantages of a model where Ofsted registers and inspects at individual-setting level (model 1)

This question was answered by 188 respondents, 41 of whom indicated that they could not see any advantages of a model where Ofsted registers and inspects at individual-setting level (model 1). The following chart shows the advantages that were identified by the other 147 respondents:

**Figure 13: Q20: The main advantages of a model where Ofsted registers and inspects at individual-setting level (model 1)**



The most cited advantage of registration and inspection of individual premises was that it would ensure high standards in all settings (n=133).

“It would provide greater oversight over the standards in individual premises and offer placing authorities some reassurance that standards have been met.”

(Representative body)

Increasing the consistency of provision across different settings run by larger providers was highlighted by 40 respondents. These respondents believed that, even within the same provider, different provisions may vary in quality and that inspecting each individual setting would counteract this.

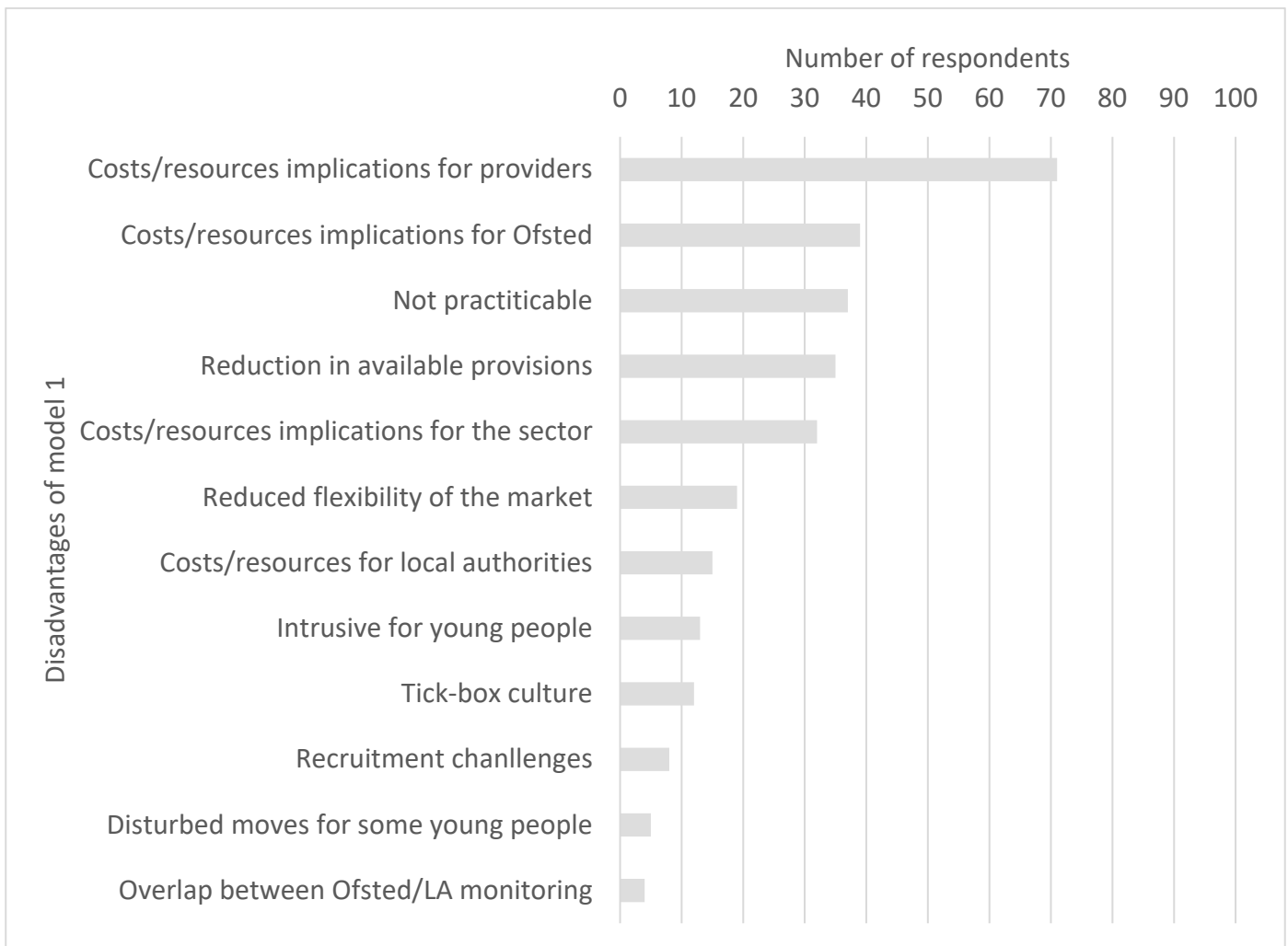
“I think it would prevent providers from showing their 'best' homes or most compliant provisions, it would ensure all provisions are maintained and meet the standards.” (Provider)

Twenty-one respondents felt that setting-level registration and inspection renders managers accountable for their own services and would be more likely to identify cases of “poor leadership on the ground”. Other advantages that were highlighted included: safeguarding concerns on the front line of the provisions being more easily identified by Ofsted (n=15); reduced likelihood of particularly poor settings or rogue providers evading detection (n=13); young people having the opportunity to speak directly to Ofsted inspectors (n=10); enhancing local authorities understanding of the quality of provision in their localities (n=10); more input from young people (mentioned by six); and comprehensive checks on staff quality (n=5).

### **Question 21: the main disadvantages of a model where Ofsted registers and inspects at individual-setting level (model 1)**

This question was answered by 185 respondents, including 20 respondents who indicated that they could not see any disadvantages of a model where Ofsted registers and inspects at individual-setting level (model 1) and 30 who offered a range of comments concerning this model. Figure 27 shows the main disadvantages identified by the remaining 135 respondents:

**Figure 14: Q21: The main disadvantages of a model where Ofsted registers and inspects at individual-setting level (model 1)**



Source: Q21; n=185

The main disadvantages identified by respondents concerned the resources/costs implications for providers (n=71), Ofsted (n=39), local authorities (n=15) and for the sector in general (costs in general, n=21; resources in general, n=11). For providers, there would be significant additional administrative costs if they had a number of settings because each one would need its own Registered Manager. There could also be significant duplication in the case of larger providers that have numerous services operating under the same policies and procedures,

“We would be particularly concerned if each individual setting had to have an allocated person similar to a registered manager who had completed formal training programmes as this would incur significant extra costs for providers if this had to be done across every setting.” (Charity)

For local authorities, there would be significant placement cost increases, as most providers would not be able to absorb the costs of Registered Managers in each setting

and might pass on the costs of registration to them. Setting-level inspection would also put additional pressure on Ofsted's resources and would require Ofsted to have a larger number of inspectors, who would need to be trained on the independent and semi-independent sector and the inspection regime.

This option would require significant recruitment of Ofsted inspectors, and it is not clear how this would be funded or whether this would be passed onto providers as part of annual inspection fees, which would then be passed onto placing authorities.  
(Local authority)

Concerns about the practicality of the proposed provider registration scheme and Ofsted inspection regime were highlighted by 37 respondents. The issues raised included the likelihood that the model may not be practicable given the volume of individual settings Ofsted inspectors would be required to visit. In this regard, it was suggested that the model would not be practicable for supported lodgings and placements in individual houses, unless each household was registered as a setting.

“There are likely be too many provisions to inspect, particularly with the flexible pop-up nature of supported accommodation.” (Representative body)

Thirty-five respondents thought that the complications of registration could result in many providers leaving the 16-17 market due to the cost implications or because they were forced to close, and that this would exacerbate the current national placement insufficiency.

“It would be a big change for providers to go from being ‘unregulated’ to something so prescriptive as model 1, which may cause a large number of providers to exit the market, creating sufficiency issues.” (Local authority)

Nineteen respondents thought that this approach could reduce the flexibility of the market to respond quickly to needs (especially emergency placements) as providers would have to wait for any new services to be registered before they could be used and might also be reluctant to take on challenging young people because it could negatively affect their Ofsted rating. Other disadvantages that were identified included: the possibility that young people might regard visits to their homes by Ofsted inspectors as intrusive was mentioned (n=13); the emergence of a tick-box culture and less time to focus on the young people they support (n=12); difficulties recruiting and retaining a registered manager for each setting, as it is unclear whether sufficient qualified and experienced staff are available in the job market (n=8); a reduction in the flexibility of provision that could result in ‘disturbed moves’ for some young people (n=5); the possibility of overlap between Ofsted and local authority monitoring of independent and semi-independent providers (n=4).

## Questions 22 and 23: Ofsted-led registration and inspection: model 2

Q22) What do you think the main advantages would be of a model where Ofsted registers and inspects at provider level (model 2)?

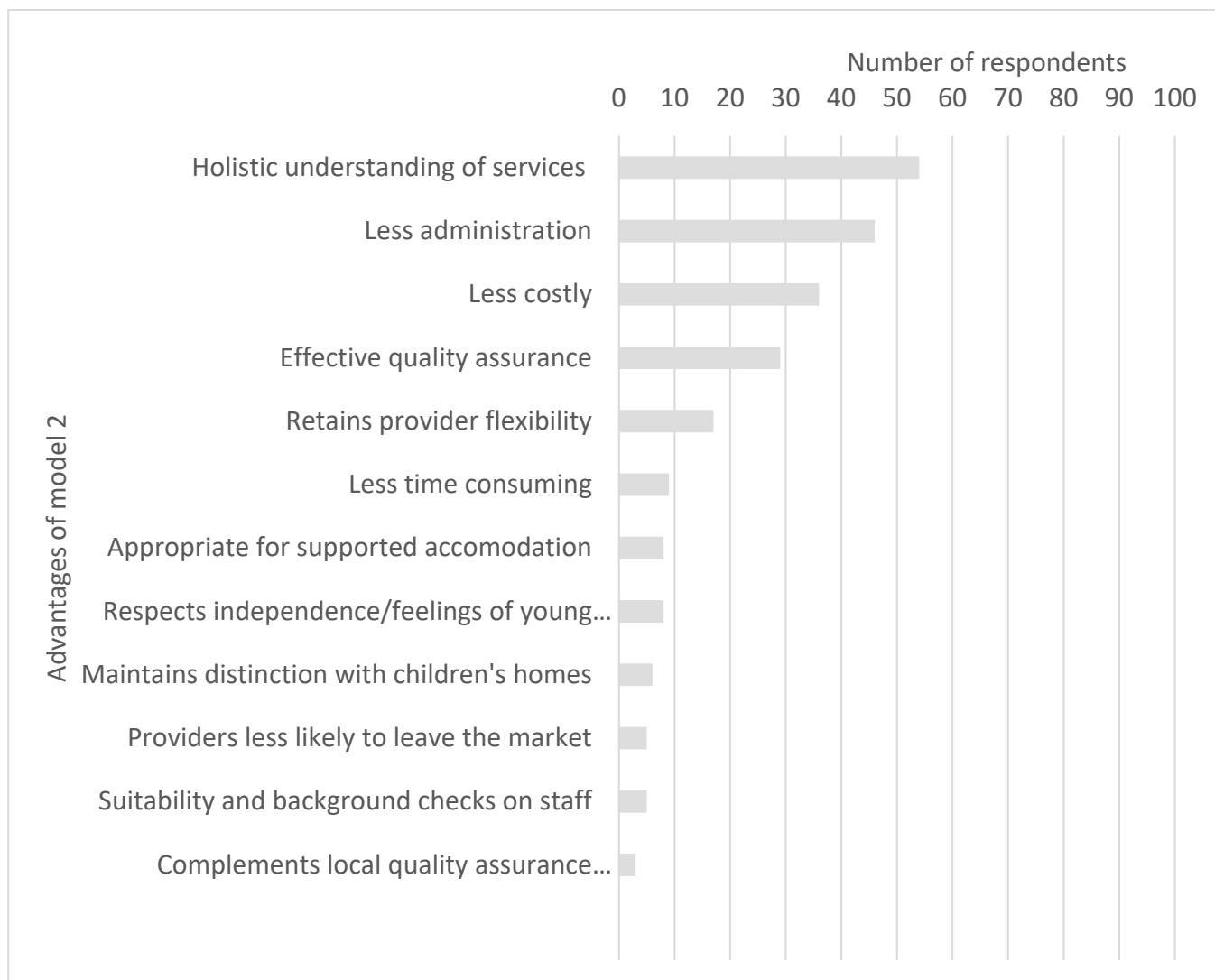
Q23) What do you think the main disadvantages would be of a model where Ofsted registers and inspects at provider level? (model 2)

### Question 22: the main advantages of a model where Ofsted registers and inspects at provider level (model 2)?

This question was answered by 188 respondents, including 17 respondents who stated that they could not see any advantages of model 2 and 27 who offered a range of comments concerning this model. Figure 28 shows the advantages that were identified by the remaining 144 respondents:



**Figure 15: Q22: The main advantages of a model where Ofsted registers and inspects at provider level (model 2)**



Source Q22: n=188

Fifty-four respondents thought that a key advantage of model 2, compared to model 1, is that it would enable Ofsted inspectors to get a holistic understanding of services operating under the umbrella of individual providers. According to these respondents, by focusing on the organisational offering and systems in place to oversee the whole service/scheme, inspections at provider level would be in a position to assess quality across the whole organisation. The importance of inspectors also visiting samples of individual settings was mentioned by 14 respondents.

“It would allow an inspector to be able to get an oversight and understand the service as a whole where there are diverse options offered.” (Provider)

Provider level registration and inspection was seen as being less administratively complex than individual setting registration/inspection (model 1) by forty-six respondents. Respondents who expressed this view suggested that it involves a more manageable

process for registration and inspection for providers and a smaller overall workload for Ofsted.

“(I)t would be more effective of one lead person having oversight and responsibility, instead of numerous leads.” (Local authority)

“Ofsted are more likely to be able to keep up with this model.” (Registered children’s home provider)

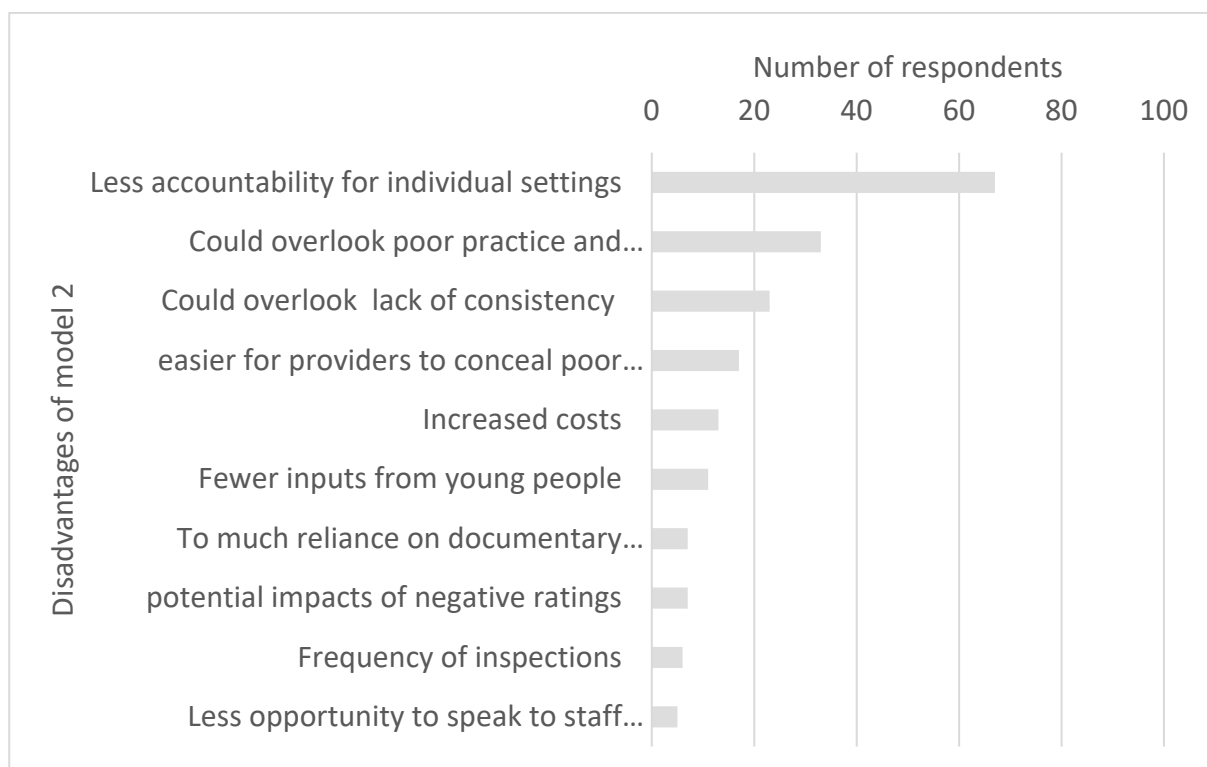
According to thirty-six respondents, having one manager responsible for an overall service would be less costly for providers to implement and maintain and there would be minimal on-costs for local authorities. The effectiveness of the model as a means of improving the quality of provision was mentioned by twenty-nine respondents, while 17 respondents thought that the provider-level model offers streamlined processes of registration and flexibility that would allow providers to flex their accommodation portfolios to meet the needs of young people being referred.

Other advantages of registering and inspecting at provider level mentioned by respondents were: it would be less time consuming for both providers and Ofsted (n=9) and more appropriate for supported accommodation (n=8); it respects young people’s feeling of being in control and having ‘ownership’ of their accommodation (n=8); it maintains a clear distinction between residential children’s homes and the supported accommodation sector (n=6); it would be less likely to have a negative impact on placement sufficiency (n=5); it subjects individuals associated with the registration of providers to suitability and background checks (n=5); it would complement local quality assurance arrangements that are in place in many local authorities (n=3).

### **Question 23: the main disadvantages of a model where Ofsted registers and inspects at provider level (model 2)**

This question was answered by 165 respondents, including 25 respondents who indicated that they could not see any disadvantages of a model where Ofsted registers and inspects at provider-setting level (model 2) and eight who offered a range of comments concerning this model. Figure 29 shows the most cited disadvantages identified by the remaining 132 respondents:

**Figure 16: Q23: The main disadvantages of a model where Ofsted registers and inspects at provider (model 2)**



Source: respondents to Q23 who identified disadvantages of model 2; n=132

Less accountability for individual settings was seen as a disadvantage of model 2 by 67 respondents. According to these respondents, provider level inspections, involving visits to a sample of the settings operating under the umbrella of multi-setting providers, would involve significantly less oversight of the quality of the settings than model 1, and would mean that no one would be held to account to comply with policy and procedures from Ofsted at the individual setting level.

“Seeing as most of the concerning elements that have led to this review are about how young people are supervised on premises and what tasks are actually being undertaken by homes, it seems like it would be difficult to implement standards that would not have a regulator visiting properties.” (Local authority)

“A less stringent regime, such as proposed model 2, would not offer the same level of quality and safety assurance for young people in independent/semi-independent accommodation, as model 1.” (Charity)

The concern that some sub-standard settings might not be inspected during provider-level inspections and that, as a result, poor practice and safeguarding issues could be overlooked by the Ofsted inspectorate was expressed by 33 respondents. Twenty-three respondents thought the model is too overarching and could overlook inconsistencies in the way individual settings are being run under the umbrella of multi-setting providers.

According to 17 respondents, provider-level inspections would make it easier for providers to divert attention away from poor practice and unsuitable living environments.

““This model would make it much easier for providers to cover up poor practice. It relies too much on provider evidence rather than Ofsted inspectors getting underneath the service and asking the right questions to find out what is really being delivered.” (Charity)

Other disadvantages of the provider level model identified by respondents were: providers would incur significant costs due to need to register with Ofsted, recruit and pay the salaries of registered managers and allocate staff time to deal with inspections (n=13); it would involve less contact with, and direct feedback, from young people (n=13) and the staff employed to look after them (n=5); the model relies too heavily on documentary evidence with multi providers and that organisations could compile evidence to show themselves in a favourable light (n=7); and regulatory compliance issues with an individual setting could result in poor inspection outcomes at provider level, thereby affecting all settings operated by the provider, and/or a provider being rated inadequate could impact on individual settings that are operating satisfactorily (n=7).<sup>4</sup>

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<sup>4</sup> It was also suggested that, if the frequency of Ofsted inspections were more than annually, this would make them less effective and would reduce the local authorities confidence at provider level (n=6) and that the model would provide less opportunities than model 1 for Ofsted inspectors to speak to staff (n=5).

**Questions 24: If you think an alternative model would be appropriate, please explain what you think the key features of this should be, and 25: How often do you think providers and/or settings should be inspected?**

Q24) If you think an alternative model would be appropriate, please explain what you think the key features of this should be - If you think an alternative model would be appropriate, please explain this.

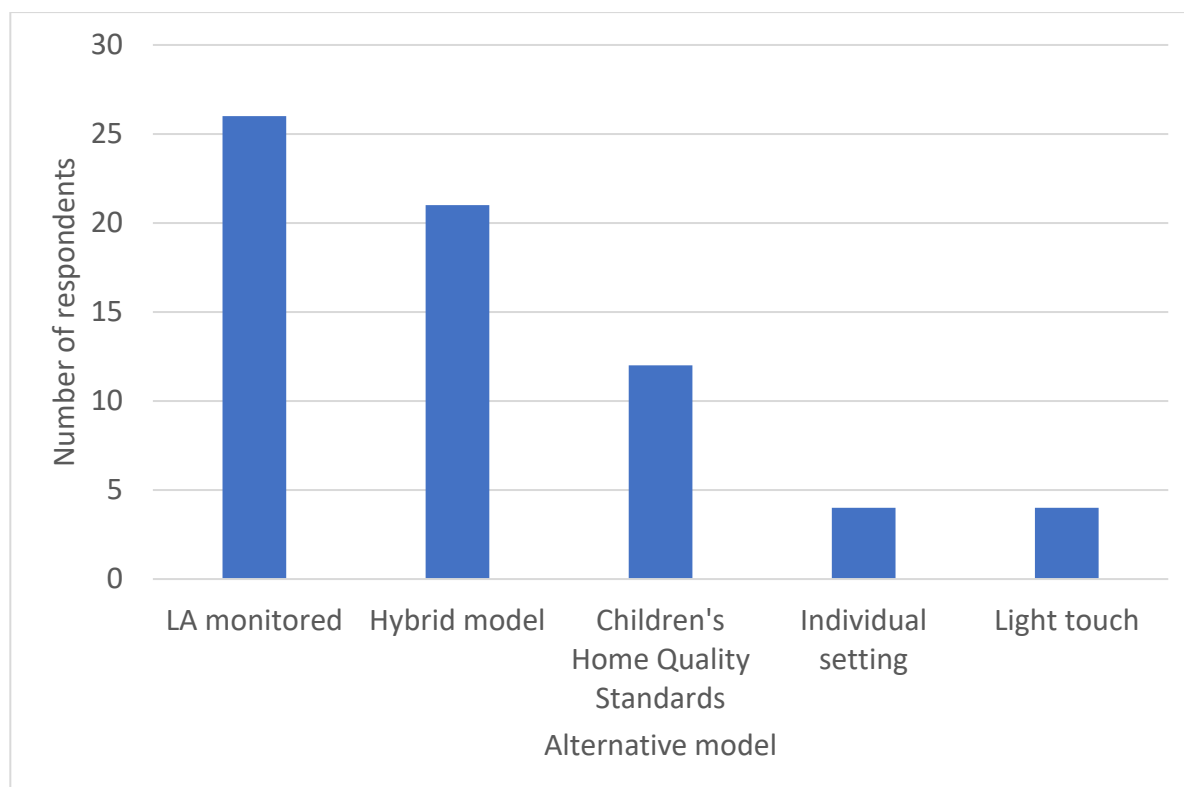
Q25) How often do you think providers and/or settings should be inspected? Please explain your answer, including if you think this inspection should be at provider-level or individual-setting level, as set out in the previous question

These were both open questions, each with more than one element. The majority of respondents either left a blank or provided a response that did not relate to the questions. This may be because respondents did not have a view, were unsure what the questions were asking or were fatigued by the time they came to the end of a long questionnaire with an unusually high number of complex open questions.

**Question 24: suggestions for alternative models**

This question was answered by 82 respondents, with others either leaving the question blank or providing a response that did not answer the question. A number of alternative models were only proposed by a single respondent, but similar suggestions that came from several respondents can be seen in the following chart:

**Figure 17: Question 24 Alternative inspection models**



Source: suggestions in response to Q24 made by more than one respondent; n=67

The most common suggested alternative was inspection by the Local Authority (n=26), although there were differences in how respondents saw this as working with suggestions including outsourcing this via tendering, local authorities leading but feeding into wider Ofsted reviews and local authorities being responsible for ensuring the implementation of the national standards with Ofsted monitoring their effectiveness as part of their inspections of children's services. Of the 23 organisations advocating a Local Authority led model, seven were charities, seven were providers and nine were local authorities.

An approach described as a hybrid of models 1 and 2 was proposed by 21 respondents (including six local authorities, four charities, three representative bodies and two providers). While some simply said that a mix of the two models was preferable, others provided more details on how they saw this working, often with an element of intelligence-led inspection or slightly different arrangements depending on the size/type of provision:

“There could potentially be a hybrid model, where providers are inspected with random unannounced spot checks on settings, or targeted ones according to concerns which may offer some assurance. This would be the best balance of time demand and setting checking” (Representative Body).

“If model one was selected there could be a hybrid model where LAs support the QA of individual tenancies using a standard template and online portal which would then trigger the need for Ofsted visits to provisions of concern” (Semi Independent, children's homes and fostering independent provider).

A regime more akin to that applying to registered children's homes was the preferred model of 12 respondents although the nine organisations advocating this were predominantly charities (n=4) and representative bodies (n=2) and just two local authorities. No providers supported this option. Respondents supporting this model largely felt that there was no obvious justification for treating older children differently to younger ones.

Most other options proposed were confined to one or two respondents, although four said that whatever option was chosen, inspections should be light touch. Two suggested that registration should be at registered manager level rather than at setting level – although one did concede that this could be problematic should the individual leave and the provision they had been responsible for was no longer within the regulatory system. Conversely, four respondents said that the model should be based on individual settings rather than providers. A full breakdown of responses can be found in Table 42 in Annex A.

Local authorities, providers and charities were most likely to suggest a local authority led monitoring model as an alternative, whereas a regime similar to that operating in children's homes was not supported by any providers and by only two local authorities.

## **Question 25: Frequency of inspections**

This question asked respondents how often they thought providers and/or settings should be inspected. Some respondents simply gave a frequency whereas others related their answer to their preferred model (providers or settings); some gave different frequencies for providers and settings in which some thought that providers should be inspected more frequently than settings and others the reverse. However, as this was an open question inviting a narrative response, and the second part of the question asked them to explain their answer, including if they thought this inspection should be at provider-level or individual-setting level, as set out in the previous question, many also chose to revisit question 24 and reiterate their views on inspection models. Still others chose to set out a complex schedule of visits and inspections by different bodies of different types of settings according to a range of criteria, often based on their preferred inspection model. This makes responses difficult to aggregate; for example (noting that it is not clear whether this is at the provider or setting level):

“Ofsted should inspect at the initial stage and the LA should review and report any issues back to Ofsted. Yearly inspections from Ofsted with three unannounced visits from the LA, however the LA would need investment in staff to build

capacity. Monitoring should include; Independent visitors every month; LA quarterly monitoring visits; Providers to submit a quarterly analysis; Ask registered Manager to go to regulated body; Events feedback may escalate to Ofsted” (Local Authority).

An alternative inspection regime was suggested by a Charity:

“Whilst we have confidence in our own services, we have, based on our professional experience, such a lack of confidence in unregulated service provision for children aged 16+ and care leavers aged 18+ as a whole, that we would want to see an inspection of 25-30% of the total of a provider’s individual settings within the first year after a provider is registered with Ofsted has children in placement. Once a provider has been inspected and has met all the standards, then the inspections could reasonably be reduced to once within every three-year window, in line with Independent Fostering Agency rules.”

In a different proposal, a Representative Body argued:

“Because this is an inspection of residential settings accommodating children, the future inspection schedule should align with Her Majesty’s Chief Inspector of Education, Children’s Services and Skills (Fees and Frequency of Inspections) (Children’s Homes etc.) Regulations 2015 and Ofsted’s inspection framework for children’s homes<sup>13</sup> – and will require amendments being made to each.”

In all, 175 respondents provided an answer to question 25. Coding these responses gave 84 distinct suggestions, with many respondents describing their ideal inspection regime with multiple components. Therefore, even where an aspect of an inspection protocol is suggested by two or more respondents, when combined with the other elements of the proposed by each respondent, these can form part of very different proposed regimes. With those caveats, we have attempted some analysis.

Only 24 respondents specifically stated whether they preferred provider or setting level inspections and they were equally divided between the two. Additionally, many respondents distinguished between provider and setting level inspections, suggesting different regimes for each (or just giving suggestions for one or the other). Some provided different ideas depending on the eventual model. Some suggested inspection frequencies without stating whether these should be at provider or setting level. Four respondents explicitly stated that inspections should be at both provider and setting level.



Of those that did not state the level at which the inspection should take place (n=46), 50 per cent of respondents thought that inspections should take place annually.<sup>5</sup> Table 8 sets out the suggested frequency:

**Table 8: Q25. Suggested frequency of inspections, level not stated**

Frequency	Number of respondents
Annually	23
2 years	6
3 years	4
2-3 years	4
6 months	2
At/before registration	2
2 in the first 12 months	1
12-18 months	1
Quarterly	1
3-5 years	1
5 years	1

Source: respondents who did not state the level at which the inspection should take place; n=46

As can be seen in Table 9 below, just under a third (n=24) of those whose responses specifically related to provider level inspections thought that annual inspections were appropriate. However, 17 respondents thought that inspections every three years was optimum with another five agreeing, providing that no concerns had been raised about the provider and/or the previous inspection had been positive. A number of respondents suggested different levels of frequency based on risk although usually with a minimum frequency of inspections for all. Four respondents suggested an entirely risk-based approach with inspections only taking place if a risk assessment triggered one. A number of triggers were suggested including complaints, results of local authorities' quality assurance processes and/or provider self-assessments.

**Table 9: Q25. Suggested frequency of inspections, provider level**

Frequency	Number of respondents
Annually	24
3 years	17
2 years	7
3 years if no concerns	5
Risk based	4

<sup>5</sup> In addition, a very small number thought they should take place in less than one year.

6-12 months	2
Established providers 4-5 years	2
Annually if no concerns	2
2-3 years	2
6 monthly if concerns	2
Every 2 years if no concerns	2
3-4 years	1
New provider annually for 5 years then every 3 years	1
Annually unannounced plus sample of settings	1
At registration then year 1, then every 3 years	1
3 monthly if severe concerns	1
3-4 months	1
Spot checks	1

Source: respondents who suggested that inspections should take place at provider level; n=76

As with provider level and unstated responses, the highest number of respondents providing a frequency for settings level inspections thought this should take place annually (n=17).

**Table 10: Q25. Suggested frequency of inspections, settings level**

<b>Frequency</b>	<b>Number of respondents</b>
Annually	17
2 years	6
6 months	5
3 years	3
3-6 months	1
2 months after young person moves in	1
Frequently	1
2-3 years	1
25-30% of settings in first year of registration	1
Sample	1

Source: respondents who suggested that inspections should take place at settings level; n=37

Some respondents instead of, or in addition to, providing a suggested frequency of inspections, suggested that the system should mirror those for other provision, most

predominantly children's homes, suggested by 19 respondents. While not all of these stated what the frequency of inspections is, where they did so this differed between those who stated that children's homes were inspected annually and those who said they were inspected twice-yearly. One respondent suggested that the frequency of inspections should be the same as that for fostering, one the same as for schools, and a third that it should be somewhere between that of children's homes and fostering. Where respondents also gave a frequency, this was noted in the charts above.

Several respondents suggested that inspection should be by local authorities instead of, or supplementary to, Ofsted inspections. Six respondents suggested that local authorities should conduct annual inspections (it was not clear whether this would be of providers, settings or both), one that this should be every six months and two that this should be quarterly.

While there were a vast number of suggested features of inspections suggested by respondents, there were none other than those already referenced that were suggested by more than one respondent. A series of more closed responses giving possible levels of inspection, frequencies for each, possible gradings and what might trigger emergency inspections or increased frequency, might be able to establish the extent of any consensus.

## Children and Young People's Consultation

### Questions 5 and 6: Do you think the suggested differences in the table are a good way to tell the difference between care and support?

Q5) Do you think the suggested differences in the table are a good way to tell the difference between the two?

Q6) We would like to know why you answered the way you did. Please explain your answer here in more detail - The things that you might want to explain in more detail could include anything you think that the table is missing and anything in the table that you don't agree with

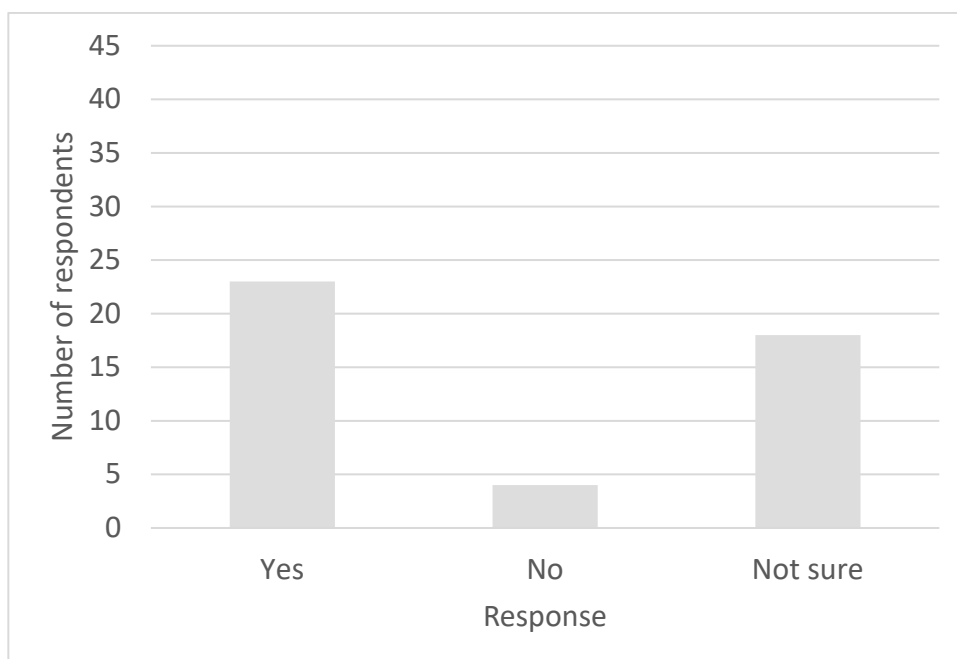
### Question 5 and Question 6: Do you think the suggested differences in the table are a good way to tell the difference between care and support?

As Figure 12 shows, just over half (23) of the CYP who answered Question 5 (n=45) thought the differences in the table are a good way to tell the difference between 'care' and 'support', while only four said that they did not think this was the case. The remaining 18 CYP were not sure one way or the other.<sup>6</sup>

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<sup>6</sup> There was a mixed response amongst adults who completed the CYP survey, with 11 answering 'yes' to this question, six answering 'no' and seven answering 'not sure'.

**Figure 18: Q5: Do you think the suggested differences in the table are a good way to tell the difference between the two?**



Source: responses to question 5; n=45)

### Those answering ‘yes’ to question 5

Of the 23 CYP who answered yes, 15 expanded on their responses in answers to Q6. Six of these CYP thought that the table clearly explained the differences between ‘care’ and ‘support’.

“There is a clear difference between care and independent, so it is easy to see what you are looking at.” (Currently in care)

“I believe that the differences are clear and reasonable” (Care leaver)

Seven CYP thought the indicators highlight the independence of those who reside in semi-independent accommodation, however two were concerned that the table could be seen as portraying children’s homes in a negative light.

“it shows what we can do where we are rather than if we were in a residential home.” (Currently in care)

“Personally I just believe that to make people reading that feel better about care homes maybe include more positives as it does seem very portrayed as if they have no power over themselves which may lead them to believe their voices will not be heard.” (Currently in care)

One CYP thought the table clearly explained the difference between ‘care’ and ‘support, but was concerned that the indicators do not adequately explain the support a young

person would receive in semi-independent accommodation if they needed it. One CYP emphasised their agreement with the criteria.

### **Those answering 'no' to question 5**

The four CYP who answered 'no' explained why they did so in response to Q6. One described how staff arrange their health care appointments, transport them to their appointments and help them to manage their finances. In their opinion, contrary to what the table suggests, these actions constitute 'support' not 'care'. This chimes with the views of another CYP who makes the point that care leavers do need help and, by implication, that the table should reflect this.

“Even care leavers need people to look out for them and step in to keep them safe. Social services already want to get rid of us at 18 and this helps them to not care.”  
(Currently in care)

Another CYP who answered 'no' thought the table was accurate but that more information is required in regards how 'care' is defined.

### **Those answering 'not sure' to Q5**

Five of those who were 'not sure' answered Q6. Three emphasised the importance of semi-independent accommodation staff assisting young people with some areas such as budgeting, meeting their health care needs and safeguarding.

“Sometimes you need to tell people where you are, so they know you are safe. Sometimes they need to help with budgeting, and I wouldn't mind staff knowing my medical.” (Currently in care)

One CYP was unclear about what they were looking at, while another felt that they did not know enough about the topic to comment on it.

## Questions 7 and 8: Should we call this type of accommodation ‘supported accommodation for older children’?

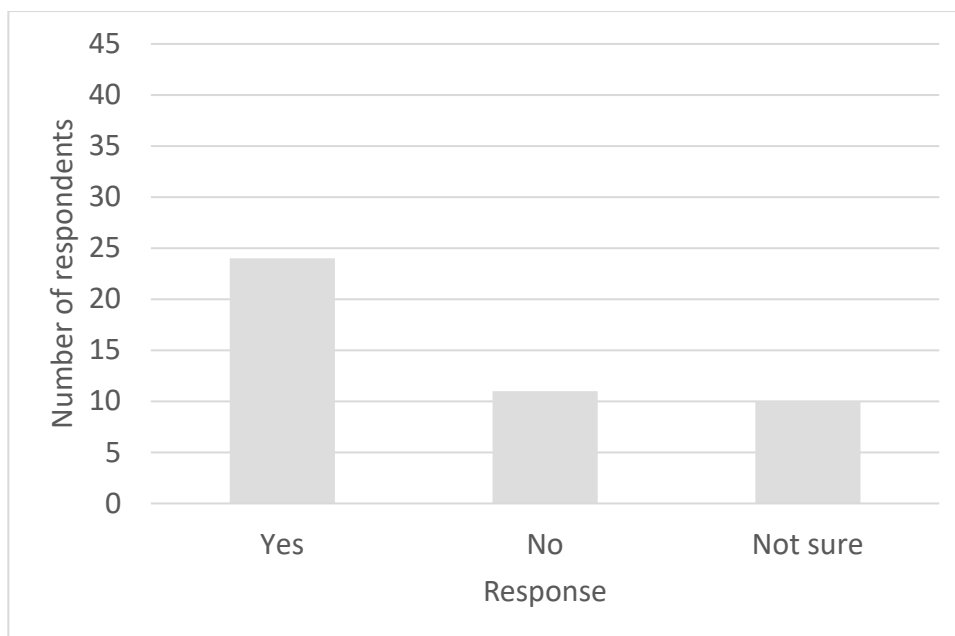
Q7) Should we call this type of accommodation ‘supported accommodation for older children’?

Q8) We would like to know why you answered the way you did. Please explain your answer here in more detail. - The things that you might want to explain in more detail could include why you think this is/isn't a good name to use or if you have any other suggestions for names

### Question 7: Should we call this type of accommodation ‘supported accommodation for older children’?

This question was answered by 45 CYP. As Figure 3 shows, just over half (24) of the CYP indicated that they thought ‘supported accommodation for older children’ was a good name to use in the future, 11 thought it was not a good name to use and 10 were not sure.<sup>7</sup>

Figure 19: Q7: Do you think this is a good name to use in the future?



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<sup>7</sup> Six of the adults who responded to this question answered in the affirmative, 15 answered ‘no’ and seven were ‘not sure’.

### Those answering 'yes' to question 7

In their responses to Q8, eight of the CYP who thought the name should be used in the future explained their answer in terms of the name being clear and easy to understand, while 10 cited its accuracy.

"The name is very clear and understanding for others and children moving into semi-independent living." (Care leaver)

"Because it is where someone lives, and it is supported." (Other/CIN)

"Because it describes what it is." (UASC)

### Those answering 'No' to question 7

In their responses to Q8, ten CYP who answered 'no' elaborated on their views in response to Q7. Of these six indicated that were unhappy with the reference to 'children' and would prefer '16+', 'young adults' or something similar.

"Post 16 accommodation. Like we have post 16 education." (Care leaver)

"Older children can mean anything but if the government is trying to establish that under 16's shouldn't live here then it should be called 16 Plus Accommodation." (Care leaver)

"I don't like the bit that says older children it weird. I think it should just be called 16+." (Care leaver)

"I think there should be differences in the names of accommodation to provide an absolute clarity. As independent living is very different to supported living. The age in which the accommodation is for should be specified in its name also." (Currently in care)

"Supported living for young adults. The name above does not make sense and does not always apply if someone is over 18." (Living independently)

"It feels like at 16 and 17 I am not a child." (Currently in care)

"I prefer young person or young people." (Care leaver)

Two CYP felt there should be more emphasis on the independence of young people in these types of accommodation:

"I do think all should be called supported as certain things we can do our self so are not always support, I would ask my staff if I wasn't sure." (Currently in care)



“It sounds like it’s for people with learning difficulties or not able to manage.”  
(Currently in care)

One response excluded as the respondent may have been ineligible to participate in the CYP consultation.

### **Those answering ‘Not sure’ to question 7**

In their response to Q8, one CYP who answered ‘not sure’ elaborated on their views in response to Q7. They suggested ‘Supported Accommodation and Care’, as she felt that this is what she was getting from her accommodation and support from the establishment in which she resided.

## Question 9: Please share examples of independent or semi-independent accommodation that you have lived in or heard of

Please share examples of independent or semi-independent accommodation that you have lived in or heard of - Please explain your answer

Q9.1) What the accommodation was called, for example, was it shared housing?

Q9.2) Did you share the accommodation with anyone else?

Q9.3) If you did, were they the same age as you?

Q9.4) What support did you get from people while you lived there, for example, did you get help with money, school or relationships?

Q9.5) What was good about where you lived?

Q9.6) What could have been better?

This question was subdivided into seven open questions; not all respondents answered all parts.

### Question 9.1 What the accommodation was called, for example, was it shared housing?

This was answered by three quarters (34) of the CYP (Children and Young People) who responded to the consultation; a small number gave more than one example of accommodation they had lived in or heard of, but the majority restricted themselves to a single answer describing the accommodation they currently or most recently lived in. Twenty-two gave relevant examples, the most common of which were semi-independent (n=7) and shared (n=5). It is likely that some similar types of accommodation have been given different names and, conversely, some types with the same name might encompass quite varied provision.

**Table 11: Q9.1 Examples of independent or semi-independent accommodation that CYP have lived in or heard of**

Type of accommodation	Number of CYP
Semi-independent	7
Shared	5
Supported	4
Children's home	2

Solo/independent	2
Foyer	1
Answer not relevant	1
Foster	1
Independent Supported Accommodation	1
Unstated	2

Source: Responses to Q9.1 that provided examples of accommodation in which respondents had lived; n=22 (some respondents identified more than one example)

## **Questions 9.2: Did you share the accommodation with anyone else? and 9.3: If you did, were they the same age as you?**

Twenty one (from a potential 45) respondents said they shared, or had shared, accommodation with others. One of these was fostered so shared with the foster family. Other respondents either lived alone or did not provide an answer to the question. The number shared with ranged from one other to 19, but in some instances sharing seemed to be confined to the building and, possibly, some communal areas.

It was clear that some respondents interpreted ‘the same age’ to be their own precise age, whereas others had a broader interpretation. Some gave the age of those they shared with but not their own, so the difference between them was not always apparent. Some simply said that they shared with people of a range of ages but it was not clear whether this included adults. However, five made clear that accommodation was used for those older than 18, including one respondent aged 18 who shared with one other person who was in his thirties. A sixth respondent was themselves 19 and sharing with at least one other of almost 19. Table 40 in annex A sets out the number and ages that respondents shared with by accommodation type in more detail.

## **Question 9.4: What support did you get from people while you lived there, for example, did you get help with money, school or relationships?**

This question asked about the support young people received and elicited a wide range of answers. Five respondents said the support they received was very limited:

“There was very little support and people from the neighbourhood got access to the property. They stole belongings and brought drugs into the place. It didn't always feel very safe and you always had to keep your food in your room. There was very little support from adults at any time” (Care leaver).

“They don't help me with anything really. Nothing is good about it. I would like them to help me with everything. Be there a lot, take me places, talk to me and I would like them to understand me, my needs and do activities with me. I am very lonely in my placement. I wish they would cook with me. I would like it to be more

like a home. even though I'm 18 I'm not ready to be independent. I wish there was a living room with a tv and they [had] games nights" (Currently in care).

The most common areas in which respondents said they received help were with money and budgeting (n=13), education (n=7), independent living (n=6) and cooking and healthy eating (n=7). Support for mental health was much lower (n=3). Table 40 in annex A sets out the areas in which one or more respondents said they received support.

"I am getting help with everyone, eating healthy, budgeting, seeing family, work experience" (Currently in care)

### **Question 9.5: What was good about where you lived?**

The positive area cited by most correspondents was the standard of the accommodation (n=9); this was followed by the quality of the care and the support they received (n=7). Friendly staff were cited as a positive by two respondents and the fact that the provision was staffed 24/7 contributing to a feeling of safety was mentioned by one. While one, who had been in foster care, liked being in a family setting, for three respondents the feeling of independence was an important positive aspect of their provision. Table 40 in annex A provides further detail about the responses.

"I like some of the staff and the area. The house is really nice and I enjoy living here" (Currently in care)

### **Question 9.6: What could have been better?**

Only 15 respondents provided an answer to this question and those responses were very varied.

Issues around other occupants were cited by five as things that could be better. This was often around age range:

"It was dreadful, and it was 16-24 age range far too wide, girls and boys, and you can imagine the amount of pregnancies that ended in" (Care leaver)

"I lived at \*\*\*\* - it was a children's home ! didn't like anything here as I was with really younger kids and it just didn't work for me" (Currently in care).

In two instances, issues around other occupants were also linked to safety concerns:

"Unfortunately, my experience was marred by the fact that I received no effectual support and that people above the age I was told lived in the house. I was not told that supported accommodation was unregulated. I shared the house with 5 other people of the ages 17-30. I think this unacceptable and that different ages dictate different needs, and they cannot be grouped together..." (Currently in care).

“I went to shared accommodation at age 17. I lived with lots of young people I had never met before. We shared a kitchen, toilets and showers. There was very little support and people from the neighbourhood got access to the property. They stole belongings and brought drugs into the place. It didn't always feel very safe and you always had to keep your food in your room. There was very little support from adults at any time...It was bad because it felt like being dumped in the roughest area without support.” (Care leaver).

One respondent living in semi-independent accommodation felt that more rules, particularly around visitors, that are strictly enforced would be helpful. In relation to socialising, another respondent wanted to be able to socialise in own rooms but was restricted to communal areas. One respondent liked everything about their accommodation but would have preferred to be closer to a town where they have friends.

The quality of the accommodation was an issue for four respondents: two commented on the poor quality of decoration, one on slow Wi-Fi and another on the time it took to get issues dealt with. Another two respondents felt games and activities would improve the setting.

One respondent felt that the quality of support from staff could be better; another that there was a problem because of the high use of agency staff although the permanent staff were helpful.

## Questions 10, 11, 12 and 13: Views on the proposed new standards

Q10) Do you think we have missed anything that you would expect the new rules to cover? - Please explain here

Q11) Do you think we have included anything that shouldn't be included in the new rules? - Please explain here

Q12) Do you think it is a good idea for Ofsted to inspect independent and semi-independent accommodation in future?

Q13) We would like to know why you answered the way you did. Could you please explain this in more detail? - In this, you might want to include what you think the positives and negatives could be if Ofsted inspected this accommodation in the future.

### Question 10: Do you think we have missed anything that you would expect the new rules to cover?

This question was answered by 31 respondents. Twenty answered that they could not see anything missing and two were not sure, one commenting that there was "too much to read and understand." Another response did not relate to the question.

Of the eight that did suggest additions, one (Care leaver) gave a very comprehensive and informed response:

"This is very reassuring; I would just add emphasis on the below points that are already mentioned above.

- The number, relevant qualifications and experience of staff working at the service.
- The arrangements in place to protect and promote the mental and physical health needs of young people at the service.
- The arrangements in place to support the development of skills which will enable the young person's transition towards independence.
- The arrangements in place to promote the young person's involvement in education, training or employment.
- The arrangements in place to ensure a young person is fully aware of their entitlements.

- That a 'location assessment' is undertaken, with focus on any potential safeguarding concerns, and the accessibility of local services.
- Publicly available local data, such as local crime rates and the availability of amenities and services.
- is suitable for its stated purpose, is accessible, safe and secure, well maintained and provides for the young person's individual and collective needs in a comfortable, positive and therapeutic environment, while respecting their privacy; and is adequately insured" (Care leaver).

Another care leaver thought that the proposed standards were difficult to understand and were "cold and distant". They also asked:

"What if a young person needs additional support will staff be able to provide it? Are there any rules on physical intervention or should young people who might be at risk just be allowed to leave the service? Are there any rules for how many hours staff should be around to support young people?" (Care leaver)

Another care leaver (who, in their current role had also responded to the main questionnaire) felt that the standards should ensure that those in any form of residential care "are afforded the same rights, protections and safeguards and love as those afforded in Foster Care and to implement in full existing standards as applied under existing Statutory Regulation and Oversight as exists with Children's Homes". Another care leaver felt the standards could be improved to cover aspects of support, access to services and ensuring accommodation standards are maintained.

Of the others, one thought that curfews for "older kids" should be later. Another felt that the rules should be more flexible to take account of different types of provision. Finally, one felt more consideration should be given to how young people are supported to move from a children's home towards independence over time:

"loneliness should be one of the factors when supporting young people like me. how my time is mapped and support. I shouldn't have everyday mapped in a children's homes and then nothing when I'm in an ISA. I need a couple of years in the ISA being fully supported and this should step down slowly over the years" (Currently in care).

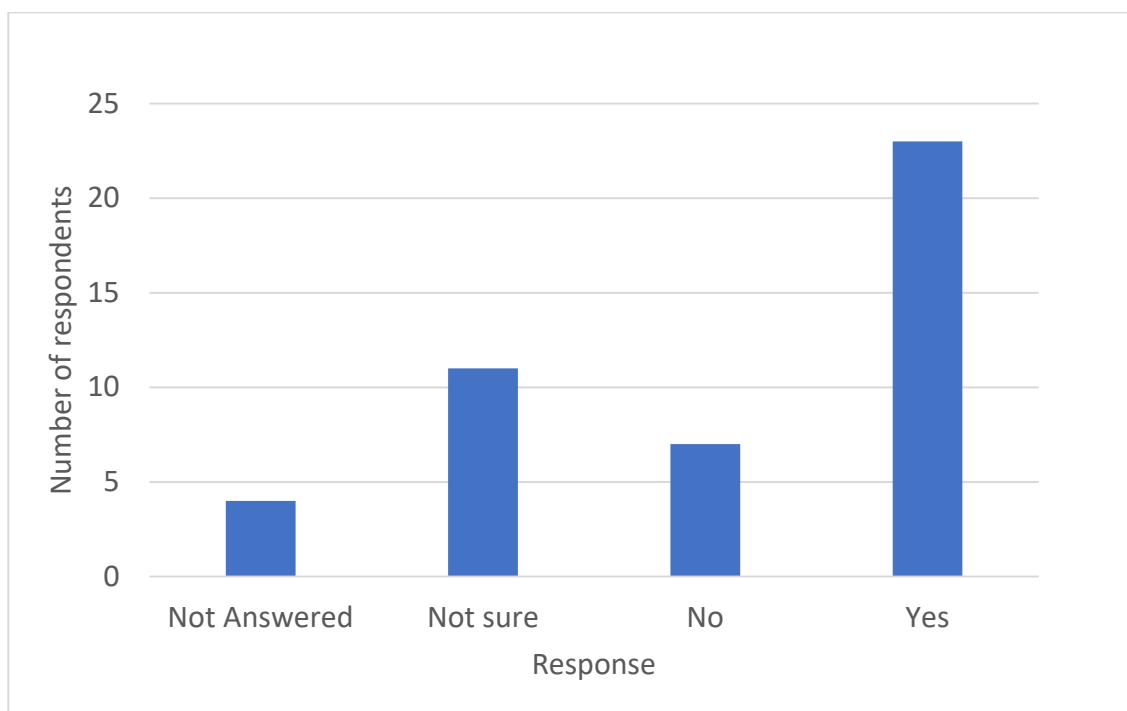
### **Question 11: Do you think we have included anything that shouldn't be included in the new rules?**

Only two respondents gave a response to this question that went beyond 'no' or 'I don't know'. One (Currently in care) commented "just that its more support and guidance for our age group not care". In a similar vein, a respondent who had also responded to the main survey, said that:

## Question 12: Do you think it is a good idea for Ofsted to inspect independent and semi-independent accommodation in future?

Fifteen of the 45 respondents either did not answer this question or said they were unsure. Of those that answered, the overwhelming majority answered 'yes' (n=23) and only seven answered 'no'.<sup>8</sup>

**Figure 20: Table 11: Response to Q12. Should Ofsted inspect independent and semi-independent accommodation?**



Source: Responses to Q12; n=45

## Question 13: We would like to know why you answered the way you did. Could you please explain this in more detail?

### Those answering 'yes' to question 12

Five of those answering 'yes' to Q12 did not provide an explanation. Of those that did, the most common reason provided (n=11) was that this would raise the standards of provision. Four respondents thought that inspection by Ofsted would be helpful in keeping young people safe ensuring provision was compliant with the new rules was cited by two respondents. That Ofsted inspections were a route to ensuring the views of

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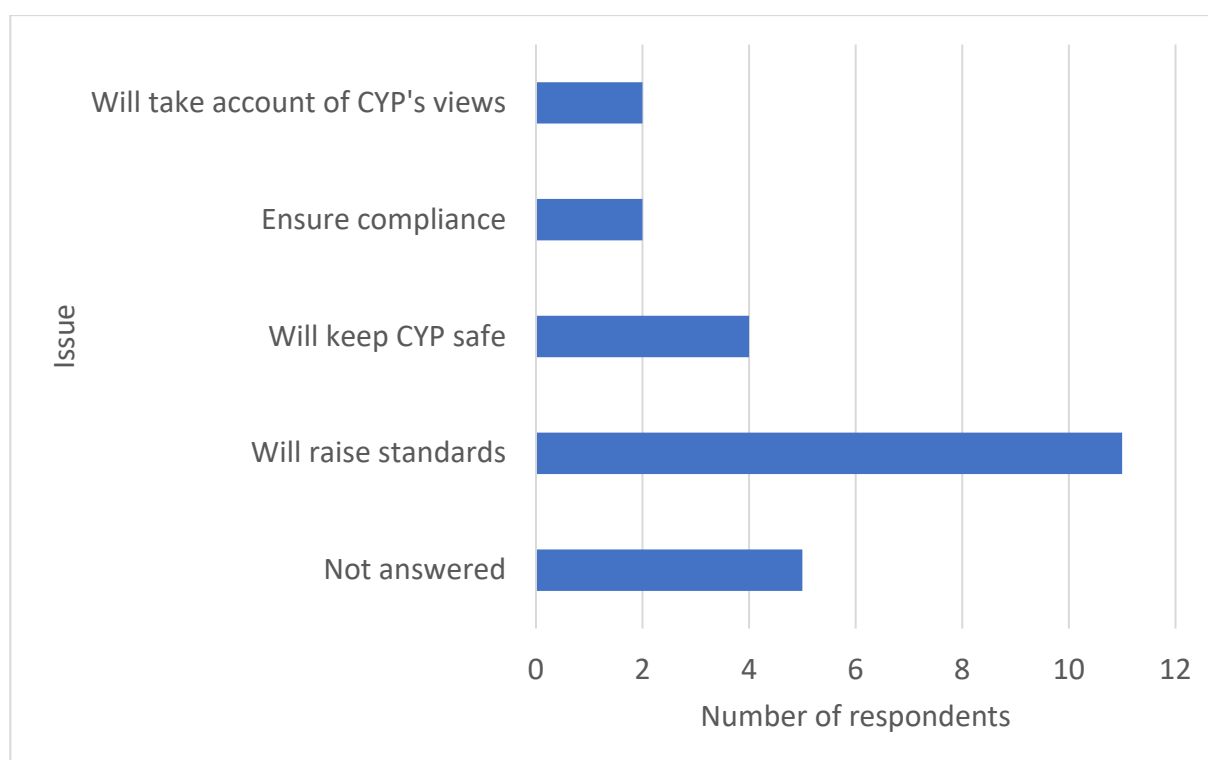
<sup>8</sup> Nineteen of the adults who answered this question were in favour of Ofsted inspections, three were opposed to them and two were 'not sure'.



young people living in the accommodation are taken into account was given as a positive by two respondents.

Only two respondents came up with potential negatives for Ofsted inspecting provision. One was concerned that “some people might not like it as they want to just be left alone and get on with being independent” (Care leaver) and another worried that changes may be enforced to some things currently working well.

**Figure 21: Q13. Explanation of those answering ‘yes’ to Q12**



Source: responses to Q12; n=23

### Those answering ‘no’ to question 12

Of the seven who answered ‘no’ to whether Ofsted should inspect independent and semi-independent provision, one did not provide an explanation and the other simply answered that they could not see any benefits of the proposal. Four of the five who provided details gave reasons that related to their fear that Ofsted would restrict their independence:

“I’m not a child. Some checks are required I’m sure it helps but that’s just a bit too much” (Care leaver)

One respondent had experience of an Ofsted in a previous setting which coloured their views “this happened in my last home and it was really strict and panic when Ofsted were coming” (Currently in care).

## Those answering 'not sure' to question 12

Five of those answering 'not sure' offered an explanation. Two explained that their setting was doing a really good job, so inspection was not needed. One felt that "Ofsted might bring rules that don't apply to my placement." Another could see that "some people don't like it but some people do". Finally, a respondent thought that inspections should be triggered only by those living in the accommodation:

"I think it should be the people living within the accommodation who decide if people come and look around, they already have the staff there to raise concerns, if there is concerns people should come and look around, if people believe it is all good it should be left that way for the young people to get on with their lives"  
(Currently in care).

# Conclusions

## Distinguishing between ‘care’ and ‘support’

With one exception, the proposed indicators for distinguishing between ‘care’ and ‘support’ were positively rated by a majority of those who responded to the main consultation, while a small majority respondents to the CYP consultation thought the indicators are fit for purpose. There was a strong current of opinion in responses to the main consultation, however, that the indicators (and accompanying guidance) should be revised in at least three respects. First, they should more clearly acknowledge that young people require (and often request) assistance with tasks such as budgeting and healthcare until they develop the skills to manage them on their own. This point was also made by a small number of respondents to the CYP consultation who had misgivings about the indicators. Second, the indicators should take more account of the safeguarding issues that providers and local authorities have to deal with, especially for young people with complex needs. Finally, it should be recognised that the journey to independence for young people also occurs in registered children’s homes and that, as a result, some of the indicators can also be true of them.

## Naming and defining different types of provision

It is clear from question responses that there is little consensus in the sector or CYP about how different types of provision are named and defined. It is apparent that some similar provision may be given different names and, conversely, some very different provision may share a name. This is further complicated by, in some instances, support being provided separately from accommodation contracts. It will be important that it is clear to all how, and to which provision, the proposed standards will apply. As a first step, the DfE will need to set out definitions and begin to establish an agreed terminology for provision and support types. Of particular concern to the sector is if and how the standards will apply to provision with host families (such as supported lodgings); provision that also accommodates young people aged 18 or over; and where support is provided separately from accommodation, for example, solo tenancies.

## Models of registration and inspection by Ofsted

Responses to the questionnaire provide a clear indication of the issues that the DfE will need to balance against each other when making a choice between the two models of registration and inspection. The setting-level model is generally viewed positively in terms of offering accountability at the level of individual premises, consistency across settings, and making it easier to identify poor practice and safeguarding issues. However, many respondents were sceptical as to whether this model was practical and cost effective due to the volume of settings that would need to be inspected and the need for registered managers in each setting. Concerns were also expressed about a lack of flexibility for

providers to develop bespoke arrangements at short notice and the possibility that many providers might leave the 16/17 -year-old market due to the costs involved. The provider-level model was viewed by many respondents as being more practicable and cost efficient, more flexible, and less likely to reduce the number of providers in the market. However, many respondents expressed misgivings about this approach on the grounds that it involves less accountability for individual settings, is potentially open to 'gaming' by providers and could make it more likely that inspectors would miss poor practice and/or inconsistencies in the way individual settings operate under the umbrella of a provider.

Like respondents to the main consultation, young people who participated in the CYP consultation, also identified issues that the DfE will need to consider. Those who looked favourably on Ofsted inspections generally thought this would raise standards, with a smaller number suggesting it would improve safeguarding and ensure young people in the provision can share their experiences and views with Ofsted inspectors. Other young people, however, expressed concerns about Ofsted carrying out inspections, mainly due to fears that this could result in a reduction in their independence.

## **The national standards**

Another issue to consider for implementation is how the standards will ensure the flexibility and range of provision that many respondents saw as necessary to meet the needs of 16- to 17-year-olds who may be at very different points on their journey to independence. This was echoed by the responses to the consultation from those who had, or were, experiencing this kind of provision. Amongst those respondents were those who felt that they received insufficient support and others who valued the opportunity to be more independent and were concerned at losing this. This makes it imperative that the focus is on providing for the needs of each and every 16- and 17-year-old, recognising that those needs are many and varied and what is right for one young person may not be right for another.

DfE will also need to consider concerns, not only about the impact of the proposals on costs, but also how to support the sector to upskill their current workforce and to attract and retain new, suitably qualified staff if the standards have implications for both staff levels and staff quality.

## **Further research**

Many localities operate frameworks for provision, either at local authority level or more widely across the region. Many respondents quoted parts of these framework requirements in response to questions. An analysis of these that explores differences and commonalities, perhaps accompanied by interviews or round table discussions with those operating them might be helpful in establishing what works well in these frameworks and which aspects are more problematic to help inform national standards.

The main consultation questionnaire consisted primarily of fairly complex open questions which respondents interpreted and answered in a myriad of different ways. This has provided policy makers with a rich source of views and experiences from a wide range of perspectives to help them understand what a complex and fragmented sector this is.

## Annex A

**Table 12: Response to Q9.1 by organisation type: Can young people go out of the establishment without staff's permission?**

Organisation type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Charity	9	5	1	3	7	25
Independent and semi-independent provision provider	26	21	2	3	2	54
Local Authority	17	19	7	6	1	50
NHS Trust			>5			>5
Other	6	9			1	16
Police		>5				>5
Provider			>5			>5
Registered children's home provider	>5		>5			>5
Representative Body	4	3	1		1	9
<b>Total</b>	<b>65</b>	<b>57</b>	<b>14</b>	<b>12</b>	<b>12</b>	<b>160</b>

**Table 13: Response to Q9.1 by individual type: Can young people go out of the establishment without staff's permission?**

Individual type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Academic					2	2
Care leaver			1		1	2
Child in care					1	1
Foster Carer				1		1
Independent / semi-independent accommodation worker	3	2			1	6
Local authority employee		1		1	1	3
Other	3	6	2	3	2	16
Parent / carer	1	2				3

Police officer	1					1
Residential children's home worker		2	1		1	4
Social worker	4	1			1	6
Not indicated		1				1
<b>Total</b>	<b>12</b>	<b>15</b>	<b>4</b>	<b>5</b>	<b>10</b>	<b>46</b>

**Table 14: Response to Q9.2 by organisation type: Do young people have full control of their own finances?**

Organisation type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Charity	9	4	4	1	7	25
Independent and semi-independent provision provider	18	20	4	9	3	54
Local Authority	8	24	7	10	1	50
NHS Trust			>5			>5
Other	8	6	1		1	16
Police	>5					>5
Provider		>5				>5
Registered children's home provider	>5	>5				>5
Representative Body	4	2	2		1	9
<b>Total</b>	<b>50</b>	<b>58</b>	<b>19</b>	<b>20</b>	<b>13</b>	<b>206</b>

**Table 15: Response to Q9.2 by organisation type: Do young people have full control of their own finances?**

Individual type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Academic					2	2
Care leaver			1		1	2
Child in care	1					1
Foster Carer			1			1

Independent / semi-independent accommodation worker	4	1	1			6
Local authority employee		2			1	3
Other	4	5	2	3	2	16
Parent / carer		1		1	1	3
Police officer	1					1
Residential children's home worker	2	1			1	4
Social worker	4	1			1	6
Not indicated		1				1
<b>Total</b>	<b>16</b>	<b>12</b>	<b>5</b>	<b>4</b>	<b>9</b>	<b>46</b>

**Table 16: Responses to Q9.3 by organisation type: Do young people have control over what they wear and the resources to buy clothes?**

Organisation type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Charity	8	5	4	1	7	25
Independent and semi-independent provision provider	30	17	3	1	3	54
Local Authority	16	19	6	4	5	50
NHS Trust			>5			>5
Other	6	5	2	2	1	16
Police	>5	>5				>5
Provider	1					>5
Registered children's home provider		>5			>5	>5
Representative Body	3	1	1	3	1	9
<b>Total</b>	<b>65</b>	<b>49</b>	<b>17</b>	<b>11</b>	<b>1</b>	<b>160</b>



**Table 17: Responses to Q9.3 by individual type: Do young people have control over what they wear and the resources to buy clothes?**

Individual type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Academic					2	2
Care leaver			1		1	2
Child in care	1					1
Foster Carer		1				1
Independent / semi-independent accommodation worker	3					6
		3				
Local authority employee		1		1	1	3
Other	3	6	2	3	2	16
Parent / carer	2				1	3
Police officer	1					1
Residential children's home worker	1	1		1	1	4
Social worker	4	1			1	6
Not indicated		1				1
<b>Total</b>	<b>15</b>	<b>14</b>	<b>3</b>	<b>5</b>	<b>9</b>	<b>46</b>

**Table 18: Response to Q9.4 by organisation type: Are young people in charge of meeting all of their health needs?**

Organisation type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Charity	9	4	3	1	8	25
Independent and semi-independent provision provider	15					54
		13	12	10	4	
Local Authority	9	19	8	13	1	50
NHS Trust			>5			>5
Other	7	5	1	2	1	16
Police		>5				>5
Provider						

Registered children's home provider	>5	>5				2>5
Representative Body	2	3	1	2	1	9
<b>Total</b>	<b>44</b>	<b>46</b>	<b>26</b>	<b>28</b>	<b>15</b>	<b>159</b>

**Table 19: Response to Q9.4 by individual type: Are young people in charge of meeting all of their health needs?**

Individual type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Academic					2	2
Care leaver			1		1	2
Child in care	1					1
Foster Carer			1			1
Independent / semi-independent accommodation worker	5			1		6
Local authority employee			2			2
Other	5	6	2	1	2	16
Parent / carer	1	1		1		3
Police officer	1					1
Residential children's home worker	3				1	4
Social worker	4	1			1	6
Not indicated			1			1
<b>Total</b>	<b>20</b>	<b>12</b>	<b>3</b>	<b>3</b>	<b>8</b>	<b>46</b>

**Table 20: Response to Q9.5 by organisation type: Do staff have any access to any medical records?**

Organisation type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Charity	11	2	3	1	8	25

Independent and semi-independent provision provider	19					54
Local Authority	7	16	6	8	5	50
NHS Trust			>5			>5
Other	8	3	2	2	1	16
Police	>5	>5				>5
Provider		>5				>5
Registered children's home provider	>5					>5
Representative Body	2	1	2	3	1	9
<b>Total</b>	<b>50</b>	<b>42</b>	<b>26</b>	<b>24</b>	<b>18</b>	<b>160</b>

Table 21: Response to Q9.5 by individual type: Do staff have any access to any medical records?

Individual type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Academic					2	2
Care leaver				1	1	2
Child in care	1					1
Foster Carer			1			1
Independent / semi-independent accommodation worker	2					6
Local authority employee		1	1		1	3
Other	4	6	2	2	2	16
Parent / carer	1	2				3
Police officer	1					1
Residential children's home worker	1					4
Social worker	4	1			1	6
Not indicated			1			1
<b>Total</b>	<b>14</b>	<b>11</b>	<b>9</b>	<b>3</b>	<b>9</b>	<b>46</b>

**Table 22: Responses to Q9.6 by organisation type: Can young people choose to stay away overnight without first seeking permission?**

Organisation type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Charity	8	2	2	4	9	25
Independent and semi-independent provision provider	21	11	8	9	5	54
Local Authority	10	21	10	9		50
NHS Trust			>5			>5
Other	3	8	1	3	1	16
Police	>5					>5
Provider			>5			>5
Registered children's home provider	>5	>5				>5
Representative Body	4	1	3		1	9
<b>Total</b>	<b>49</b>	<b>44</b>	<b>26</b>	<b>25</b>	<b>16</b>	<b>160</b>

**Table 23: Responses to Q9.6 by individual type: Can young people choose to stay away overnight without first seeking permission?**

Individual type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Academic					2	2
Care leaver	1			1		2
Child in care	1					1
Foster Carer			1			1
Independent / semi-independent accommodation worker	3	2			1	6
Local authority employee		1		1	1	3

Other	4	5	3	2	2	16
Parent / carer	1	1		1		3
Police officer	1					1
Residential children's home worker	1	2			1	4
Social worker	4	1			1	6
Not indicated		1				1
<b>Total</b>	<b>15</b>	<b>13</b>	<b>4</b>	<b>5</b>	<b>9</b>	<b>46</b>

**Table 24: Responses to Q9.7 by organisation type: Is there a sanctions policy that goes beyond house rules and legal sanctions that would be imposed on any adult?**

Organisation type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Charity	10	3	4		8	25
Independent and semi-independent provision provider	23	13	11	2	5	54
Local Authority	15	16	10	4	5	50
NHS Trust			>5			>5
Other	4	5	4	2	1	16
Police	>5			>5		>5
Provider			>5			>5
Registered children's home provider		>5	>5			>5
Representative Body	2	3	1	2	1	9
<b>Total</b>	<b>55</b>	<b>41</b>	<b>33</b>	<b>11</b>	<b>20</b>	<b>160</b>

**Table 25: Responses to Q9.7 by individual type: Is there a sanctions policy that goes beyond house rules and legal sanctions that would be imposed on any adult?**

Individual type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Academic					2	2
Care leaver			1		1	2
Child in care	1					1
Foster Carer			1			1
Independent / semi-independent accommodation worker	5	1				6
Local authority employee		1	1		1	3
Other	2	5	5	2	2	16
Parent / carer	1	1		1		3
Police officer			1			1
Residential children's home worker	2	1			1	4
Social worker	3	2			1	6
Not indicated			1			1
<b>Total</b>	<b>14</b>	<b>11</b>	<b>10</b>	<b>3</b>	<b>8</b>	<b>46</b>

**Table 26: Q9.8 by organisation type: If the establishment accommodates both adults and young people, do those under 18 have any different supervision, support, facilities or restrictions?**

Organisation type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Charity	7	3	6	2	7	25
Independent and semi-independent provision provider	19	12	11	7	5	54
Local Authority	7	21	9	10	3	50
NHS Trust			>5			>5
Other	5	7	3		1	16
Police	>5		>5			>5
Provider			>5			>5
Registered children's home provider	>5	>5				>5
Representative Body	2	3	1	2	1	9
<b>Total</b>	<b>42</b>	<b>47</b>	<b>33</b>	<b>21</b>	<b>17</b>	<b>160</b>

**Table 27: Q9.8 by individual type: If the establishment accommodates both adults and young people, do those under 18 have any different supervision, support, facilities or restrictions?**

Individual type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Academic					2	2
Care leaver	1		1			2
Child in care		1				1
Foster Carer		1				1
Independent / semi-independent accommodation worker	5		1			6

Local authority employee	1	2				3
Other	3	10	1		2	16
Parent / carer	2	1				3
Police officer	1					1
Residential children's home worker	1	2			1	4
Social worker	4	1			1	6
Not indicated		1				
<b>Total</b>	<b>16</b>	<b>19</b>	<b>3</b>		<b>8</b>	<b>46</b>

**Table 28: Q9.9 by organisation type: Are there regularly significant periods of time when young people are on the premises with no direct staff supervision?**

Organisation type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Charity	7	4	2	2	10	25
Independent and semi-independent provision provider	26	16	4	5	3	54
Local Authority	14	24	7	4	1	50
NHS Trust			>5			>5
Other	4	9	2		1	16
Police	>5		>5			>5
Provider			>5			>5
Registered children's home provider	>5					>5



Representative Body	3	1	1	3	1	9
<b>Total</b>	<b>57</b>	<b>55</b>	<b>18</b>	<b>14</b>	<b>16</b>	<b>160</b>

**Table 29: Q9.9 by individual type: Are there regularly significant periods of time when young people are on the premises with no direct staff supervision?**

Individual type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Academic					2	2
Care leaver			1			1
Child in care	1					1
Foster Carer		1				1
Independent / semi-independent accommodation worker	4	1			1	6
Local authority employee		2			1	3
Other	6	6		1	3	16
Parent / carer	1	1			1	3
Police officer	1					1
Residential children's home worker	2	1			1	4
Social worker	4	1			1	6
Not indicated			1			1
<b>Total</b>	<b>19</b>	<b>13</b>	<b>2</b>	<b>1</b>	<b>11</b>	<b>46</b>

**Table 30: Q9.10 by organisation type: Do staff have any responsibility for aftercare once a young person has left?**

Organisation type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Charity	2	5	7	4	7	25

Independent and semi-independent provision provider	21	11	8	9	5	54
Local Authority	8	13	19	7	3	50
NHS Trust			>5			>5
Other	3	5	2	5	1	16
Police	>5		>5			>5
Provider			>5			>5
Registered children's home provider	>5		>5			>5
Representative Body	2	1	3	2	1	9
<b>Total</b>	<b>38</b>	<b>35</b>	<b>43</b>	<b>27</b>	<b>17</b>	<b>160</b>

**Table 31: Q9.10 by individual type: Do staff have any responsibility for aftercare once a young person has left?**

Individual type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Academic					2	2
Care leaver		1			1	2
Child in care	1					
Foster Carer			1			1
Independent / semi-independent accommodation worker	4	2				6
Local authority employee	1		1		1	3
Other	3	6	3	2	2	16
Parent / carer	2	1				3
Police officer		1				1
Residential children's home worker	1					4
		1	1		1	
Social worker	3	2			1	6
Not indicated		1				1
<b>Total</b>	<b>15</b>	<b>15</b>	<b>6</b>	<b>2</b>	<b>8</b>	<b>46</b>

**Table 32: Q9.11 by organisation type: Does the establishment's literature promise the provision of care or relate to specific care support provided to all residents?**

Organisation type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Charity	11	2	4	1	6	24
Independent and semi-independent provision provider	28	14	3	4	5	54
Local Authority	19	20	7	2	2	50
NHS Trust			>5			>5
Other	8	6	1		1	16
Police	>5		>5			>5
Provider			>5			>5
Registered children's home provider	>5					>5
Representative Body	3	2	1	1	1	8
<b>Total</b>	<b>72</b>	<b>44</b>	<b>19</b>	<b>8</b>	<b>15</b>	<b>158</b>

**Table 33: Q9.11 by individual type: Does the establishment's literature promise the provision of care or relate to specific care support provided to all residents?**

Individual type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Academic					2	2
Care leaver			1		1	2
Child in care	1					1
Foster Carer	1					1
Independent / semi-independent accommodation worker	4	2				6
Local authority employee		2			1	3
Other	5	8	1		2	16
Parent / carer	1	2				3
Police officer	1					1

Residential children's home worker	2		1		1	4
Social worker	4	1			1	6
Not indicated			1			
<b>Total</b>	<b>19</b>	<b>15</b>	<b>4</b>		<b>8</b>	<b>46</b>

**Table 34: Q9.12 by organisation type: Does the establishment provide or commission a specialist support service, which forms part of the main function of the establishment?**

Organisation type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Charity	4	9	1	5	6	25
Independent and semi-independent provision provider	15	12	10	8	5	54
Local Authority	10	20	10	5	5	50
NHS Trust			>5			>5
Other	6	4	2	2	2	16
Police	>5		>5			>5
Provider			>5			>5
Registered children's home provider	>5		>5			>5
Representative Body	2		1	4	1	8
<b>Total</b>	<b>43</b>	<b>45</b>	<b>28</b>	<b>24</b>	<b>19</b>	<b>159</b>

**Table 35: Q9.12 by individual type: Does the establishment provide or commission a specialist support service, which forms part of the main function of the establishment?**

Individual type	Response					Total
	Very helpful	Helpful	Neither	Unhelpful	Very unhelpful	
Academic					2	2
Care leaver			1		1	2
Child in care	1					1

Foster Carer	1					1
Independent / semi-independent accommodation worker	4			2		6
Local authority employee		1	1		1	3
Other	4	9	1		2	16
Parent / carer	1	2				3
Police officer	1					1
Residential children's home worker	2	1			1	4
Social worker	4	1			1	6
Not indicated			1			1
<b>Total</b>	<b>18</b>	<b>14</b>	<b>4</b>	<b>2</b>	<b>8</b>	<b>46</b>

**Table 36: Question 10 Missing indicators**

<b>Possible indicators</b>
<p>Indicators which may be missing from our perspective (which may be helpful) include clarity on:</p> <ul style="list-style-type: none"> <li>*Staff transporting young people in emergencies</li> <li>*When to report missing if not keeping in contact (even though they can choose to stay out overnight)</li> <li>*If a young person is 16 years old but still in compulsory education (last year of school) - would this automatically indicate care</li> <li>*Legal orders (e.g. police tag/Youth Offending) - when this includes a curfew</li> <li>*Young people with learning or other disability - what indicates care v support</li> <li>*Social worker advising a curfew - the provider cannot enforce this but can they encourage it without it being 'care'</li> <li>*Activities - if staff complete social activities with young people does this indicate 'care' (Provider)</li> </ul>
<p>One significant difference between care provision and semi-independent provision is the use of restraint. (Local authority)</p>
<p>An additional indicator I would add is that of intervention, it is not appropriate for any physical intervention in semi-independence, if a Young Person requires this they should be in a Children's Home. (Provider)</p>

<p>Cooking food, buying food, cleaning bedrooms could be added as an indicator for care not support (Provider)</p>
<p>You need to include 'what safeguarding measures are in place' (Charity)</p>
<p>Please consider:</p> <ol style="list-style-type: none"> <li>1) Contact arrangements</li> <li>2) Transport facilities</li> <li>3) What recording and reporting is expected</li> <li>4) Disability</li> <li>5) Numbers of staff</li> <li>6) Levels of engagement (</li> </ol> <p>(Residential children's home worker)</p>
<p>In terms of missing criteria or indicators, we believe there should be something included around:</p> <ul style="list-style-type: none"> <li>- Placement stability</li> <li>- Placement efficacy (outcomes)</li> <li>- Young persons voice</li> <li>- Appropriateness of support level (hours)</li> <li>- Transition/move on plan</li> </ul> <p>We also feel very strongly that the levels of support for solo placements should be clarified for local authorities once and for all. A lot of authorities see high support placements as 'illegal' when in accordance with current guidance, this is not the case. As the consultation eludes to, the application or care versus support indicators is not always black and white, but to suggest that young people who display risk taking behaviors are not eligible for independence support as they would need a higher level of support hours is not correct. (Residential children's home worker)</p>
<p>Suggestions for a new table include:</p> <ul style="list-style-type: none"> <li>- A requirement for Local Authority specifications to comply with the standards and not contradict or deviate from them.</li> <li>- The promotion of long-term homelessness reduction aims.</li> <li>- Staff practice to enable young people to be able to be manage the challenges of living independently in the future and learn life and tenancy skills.</li> </ul> <p>(Provider)</p>
<p>In our view the key and perhaps the crucial or overarching indicator required to identify how a provider should register, either as a children's home or supported accommodation, should be whether the provision type is one that is designed to support the young person towards independence. Also, has the child been assessed by Children's Services, in conversation with the child, to be 'ready' for a service type that supports them on the journey towards increased independence and autonomy? (Charity)</p>

To adequately distinguish 'care' from 'support', indicators must address the nature of the provision rather than focus on the degree of autonomy available to children. 'Care' provision should actively address and promote the material, physical and emotional needs of a child to a higher degree than 'support' provision. A more helpful set of indicators would better distinguish the specific interventions a facility is providing. The final three indicators do reflect this to some extent, as they relate to the nature of the services provided by the setting.

However, most of the current indicators are monitoring the permissions and privacy norms that may be appropriate depending on the child's age. While it may be helpful to know the degree of independence or autonomy a child has in a setting, these indicators do not relate to the responsibilities of the placement towards the child. As part of a child-centred approach, appropriate boundaries tailored to the age and individual circumstances of a child should be agreed in all settings on a case-by-case basis, regardless of whether these settings are categorised as providing care or support.

Useful alternative indicators would monitor the extent to which a setting is actively preparing a child for adulthood. 'Independence' is one aspect of adulthood, and placements should ensure they support a child "to develop the skills s/he will need to make a positive transition to greater independence in the future". This is an expectation laid out in the Children Act 1989 guidance and regulations (3.125), so it would be appropriate to monitor the extent to which a setting is achieving this.

However, just because a young person has the 'permission' to do some of these activities (manage their finances or medical needs) does not mean they are equipped to do them safely or well. It is the 'equipping' aspect and support in managing some of these indicators that is crucial for judging whether the service is providing support. Independence is important, but only one aspect of adulthood. To properly prepare someone for adulthood also means that they are able to build healthy, positive relationships of inter-dependence through which they feel equipped to contribute and participate within communities. Forming positive relationships and belonging to communities are vital for a person's healthy development, and this should be one of the primary functions of 'support' settings.

(Charity)

It would be helpful to have an indicator that outlines basic safeguards and security elements. Whilst there is one about young people being in the property alone it is felt that support should offer on call staff for emergencies and support. Security systems in the property such as CCTV outside, entrance codes etc known to the young people would be support not care as provides security but allows individuals to come and go. An indicator outlining if the staff are qualified would be beneficial as in a care setting you would absolutely expect staff to be qualified. Equally in both care and support provisions the \*\*\*\* believe that staff should have clear DBS records as an indicator.

(Representative body)

I'm happy with the above indicators. I wonder whether education, employment, learning independent skills should be added.

(Police)

The matter of whether a young person requires care or support is taken extremely seriously by the Council and is an integral part of our placements decision making process. However, in our experience there remain some cases where it continues to be difficult to determine exactly whether the needs of a young person are care or support or a combination of both (for example, whilst they are transition from one type of placement support to another). In addition to these indicators it would therefore be very helpful to have clear guidance from Ofsted about what Local Authorities are expected to do in those case where the distinction between care and support are less clear cut as well as clear information about how regulation with the CQC is viewed in terms of the delivery of care and support in placements for young people. It is our view that any regulation of un-regulated activity such as supported accommodation, needs to address the issue of whether children and/or young people are getting the support they need and to a consistently high-quality. Clarity over the issues raised above are therefore integral to ensuring this.

(Local authority)

In summary, it is our view that there is no clear divide between care and support. Children's Homes provide care, support and intensive supervision; Semi-Independent Homes provide supervision, support and sometimes elements of care, It is unreasonable to treat 16 and 17 year old minors as though they are adult - they still need help with health, education, food choices and need greater supervision than an adult (both during the day and overnight). The Missing Person protocol is a great example of the difference in approach taken between under 18s and over 18s in terms of supervision. / We recommend that a relevant set of criteria is drawn up to measure the differences between a care provision and a semi-independent provision. And a Likert Scale (sliding scale) scoring system created, with objective examples for each score in respect to each criteria. The overall scores should then be added up, and if the score is on one side of the centre then they should be in a care provision and on the other side a semi-independent provision. This will enable a practical balanced judgement to be made as to where to place each young person.

(Provider)

We agree that it is very hard to draw a hard and fast line between care and support, therefore we think rather than introducing two separate and distinct regimes with different standards, it would be much more straightforward to make very clear in guidance how care for 16 and 17 year olds may provide them with a far greater degree of independence than for younger children, including for example them having full control over access to their medical records (if they are Gillick competent) and being able to make many more of their own choices about education, clothing and spending. We believe this would achieve the same goal of allowing settings to adapt to the growing independence of children in this age group, without running the risk of



continuing the significant variation of provision we see in unregulated accommodation at the moment, particularly in relation to the time staff invest in building relationships with children, providing emotional support and addressing behavioural needs.  
(Organisation – other)

Source: Responses to question 10; n=15

**Table 37: Response to Q11 by organisation type. Do you agree that the Government should define all of this provision as ‘supported accommodation for older children’ in future?**

Organisation type	Response			
	Yes	No	Not sure	Total
Charity	5	17	6	28
Independent and semi-independent provision provider	22	18	14	54
Local Authority	23	21	7	51
NHS Trust	>5			>5
Other	9	3	5	17
Police	>5		>5	>5
Provider	>5			>5
Registered children’s home provider		>5	>5	>5
Representative Body	4	6	1	11
<b>Total</b>	<b>66</b>	<b>66</b>	<b>35</b>	<b>167</b>

**Table 38: Response to Q11 by individual type. Do you agree that the Government should define all of this provision as ‘supported accommodation for older children’ in future?**

How would you describe yourself?	Response			
	Yes	No	Not sure	Total
Academic		2		2
Care leaver	1		1	2
Child in care		1		1
Foster Carer	1			1
Independent / semi-independent accommodation worker	1	1	4	6
Local authority employee	1	1	1	3

Other	8	5	3	16
Parent / carer	2	1		3
Police officer			1	1
Residential children's home worker	1	3		4
Social worker	3	3		6
<b>Total</b>	<b>18</b>	<b>17</b>	<b>10</b>	<b>45</b>

**Table 39: Q12: Alternative names for provision suggested by respondents**

<b>Suggested Alternative Names</b>
Supported unregulated accommodation for older children
Supported regulated accommodation for young people
Semi-independent home for young people
16+ supported living
Leaving Care Transition Accommodation/Housing' or '16+ Transition Accommodation/Housing'
Semi-independent Accommodation for young people, or Supported Accommodation for young people in care
Supported living provision for young people aged up to 25 years.
Supported accommodation for care experienced young people
Supported accommodation for young people aged 16 up to their 25th birthday.
Supported accommodation for care leavers.
Supportive accommodation
Support living and transition into adulthood
Sem-independent accommodation for young people
Care and support accommodation for young people
Supported Independent Living for Young People
Post-16 accommodation and support
Supported Accommodation- development into adulthood
Supported and Safe Environments for Older Children
Supported and Independent Living Services

**Table 40: Q13: Examples of Independent and Semi-independent Provision, all respondents**

<b>Example</b>	<b>No</b>	<b>Comments</b>
Group living/supported accommodation/supported living	82	<p>"Young people have their own bedroom and share communal areas. There is also a staff member on the premises awake in the day and asleep at night should the young people require any support or advice."</p> <p>"We have predominantly offered supported living for young people with challenging behaviour until Ofsted came and threatened to shut us down."</p>

		<p>“Supported accommodation for young people aged 16+ within a small communal living. Direct set evidenced based support work sessions, timetabled support, pre-arranged supported community outings and activities, timetabled cookery and domestic support sessions. Social Work managed and directed within a holistic and nurturing setting.”</p> <p>“We accommodate 16–17-year-old care leavers. They live in a large house with other young people and we teach them life skills and prepare them for living alone at 18. I would want us to be able to carry on doing exactly what we are doing because I believe that what we do works really well.”</p> <p>“The provision **** delivers is a hybrid Supported Accommodation provision that is designed specifically for Unaccompanied young people who are seeking asylum and or is a victim of trafficking. The needs faced by this group of young people are unique. Therefore we have designed a model for accommodation and support that meets the unique and specific needs of the young people.”</p> <p>“Supported accommodation is the correct term. At X we offer various levels of support from daily visits to 24/7 onsite and sole occupancy provisions.”</p>
Semi-independent	69	<p>“[which offers] a generic level of support rather than assessing the child and giving them exactly what they need.”</p> <p>“We have YP in some semi-independent shared housing and the quality of this can be extremely variable. Some YP have active support from key workers who clearly have their best interests at heart, while some provisions seem to be mainly money motivated (and offer little to no support) and at present there are not enough checks and balances to enforce better standards.”</p> <p>“X offers a range of semi-independent accommodation for older children and young adults aged 16-24. For example:</p> <ul style="list-style-type: none"> <li>- 16+ young parents’ accommodation, 29 self-contained flats</li> <li>- 16+ Hostel, Looked After, Care Leavers, section 17 children, young adults and young parents – consists of 2</li> </ul>

		<p>x 6 rooms with showers, shared living area and kitchen, and 13 self-contained flats</p> <p>- 16+ Young parents' accommodation, 15 Self-contained flats and 2 shared houses with 5 rooms each</p> <p>– 16+, Looked after children, care leavers, section 17 children, young adults - 6 self-contained flats</p> <p>- 16+ Hostel – Looked after, Care Leavers, section 17 children, young adults 28 rooms, rooms are paired into two rooms with their own shower and sharing a kitchen.</p> <p>“</p> <p>“One semi-independent provision provides 2 staff to 1 child 24/7. They seem to take on YPs who have been criminally/sexually exploited and appear to work more intensely with them to try and turn a corner. Whilst this is commendable, I struggle to see how it can be classed semi-independent, i.e., an unregulated provision.”</p>
Supported Lodgings	34	<p>“I find supported lodgings suitable for low level need, where they are not isolated and are less likely to find themselves vulnerable.”</p> <p>“There is no statutory or otherwise agreed definition of supported lodgings. Supported Lodgings are a form of supported accommodation for vulnerable and/or homeless people who are not ready to live independently. They are provided by private individuals who offer a room in their home and varying levels of support. The aim is to provide a safe and supportive environment and the opportunity to develop skills necessary for independent living. The vast majority of provision is co-ordinated by Supported Lodgings Schemes, which recruit and support a network of providers, usually on a local basis. Service users include young and vulnerable people who are unable to live with their parents; people with learning disabilities, mental ill health, or who are ex-offenders; or who have a combination of these needs. Most, but not all, of supported lodgings provision is of a temporary nature.”</p>
Floating support	27	<p>“Some of our SIA's have floating support so the YP will be assessed as needing on average 10 hours a week support. I find this provision completely unacceptable and have challenged and escalated this within the area.”</p>

		“We offer... other accommodation in tenancies licensed to children’s social are for young people to live in with floating support provided by the **** .”
Solo placement/occupancy /independent living	24	
Supported tenancy/Supported independent living	14	“There are two models of this, 1 where young people live in standalone flats or one where there are several flats in a building with staffing overnight – some young people really need the staffing on overnight for some time while they develop.”
Shared (without staff present 24/7)	12	
Outreach support	9	
Foyer	8	“These are often used to accommodate a young person between 16-25 and provide a safe accommodation and learning experience. In some settings the learning occurs within the building the person lives in whilst in others that person may have a placement in an educational setting or employment.”
Young parents’ accommodation	7	
Shared lives/Supported accommodation in a family environment	5	“The best I have witnessed is “Shared lives”, where young people **** part of a family, where some independence is encouraged but adults are available at all times and children blend into the household family unit as one.”
Night stops	5	
Training flats	4	
Unregulated	3	“Children are placed in unregulated placements when they are difficult to place children, which in effect means that the most vulnerable children are placed with the least experienced support to meet their needs.”
Hostel	3	
Women’s refuges	3	
Foster placements	3	
Therapeutic supported accommodation	3	
Residential care	2	
Staying Put (post 18)	2	

Supported accommodation – housing led	2	
Bed and Breakfast – unregulated	2	
Care within supported living	2	“Essentially, they provide care within supported living and I have advised that whilst it is illegal for them to do so they should work to the children’s homes regulations and standards.”
Supported Living Plus	2	“Shared House with daily support and sleep in staff on site 10pm till 7am. This for young people aged 16-17 stepping down from high level of support to see if Supported Living is appropriate.”
Emergency hostels	2	
16 plus provision	2	“The provision which we commission varies from a few hours support per week to 24/7 support where there is a plan in place to reduce that support.”
Host families	2	
Semi-independent package within a Registered Children’s Home	1	“A large house split into studio flats with 24hr staff support and a communal area would do it. By being registered as a children’s home you can be flexible with the care and support and still be regulated as a children’s home... A lot of LAC need a lot more support than the average child living at home. Young people starting with a more caring package and progressing through to more independence. A service needs to start with care and this is why I feel it is the Children’s Homes Regulations which just need a tweak to allow flexibility for the older children.” (NB. This seems to be a wish rather than an example of what currently happens)
YMCA	1	“a colleague of mine moved a young person into shared accommodation run by the YMCA, who was appalled with the accommodation, but because costs was the biggest factor this was where the young person was placed by the local authority.”
Local Authority Emergency Provision	1	
HMO disguised as a B & B	1	
16+ supported living service	1	“Our service accommodates young people aged 16-21 who are being supported by their local authorities for a variety of reasons.”

Safe Base	1	“Emergency housing for up to 10 days when a YP presents as homeless, no care given, however, more intensive support to move YP on into a more permanent accommodation listed above, or reconciliation move back home”
Crash pads	1	
Flat clusters	1	
Safe accommodation for those escaping exploitation or abuse	1	
Family rooms	1	
Winter night shelters	1	
Single gender accommodation	1	
Xroads	1	
Lighthouse model	1	
Safe Move	1	

**Table 41 Q13: Support provided by provision type (local authority respondents)**

<b>Provision type</b>	<b>Support provided</b>
Supported lodgings	<p>Host providers are recruited by an external provider to provide a supported lodgings arrangements within their own home. The young person has their own bedroom but shares the main communal areas with the host provider. The provider is there to support the young person to develop the skills they need to take the next step towards independence.</p> <p>Provision in a family home with a host. Levels of support vary according to need, with all types of provision able to be scaled up or down as the needs of young people fluctuate.</p> <p>For 16- to 21-year-olds who would like to live in a family setting and develop their independent skills and be supported with their emotional health and wellbeing whilst growing up into adulthood.</p> <p>A host provides a room and support in their own home.</p> <p>Short stay with host families - Host families provide a room in their own home. Young people with a range of needs including: substance misuse; alcohol abuse; mental health issues; offending behaviour; aggressive behaviour; domestic abuse / inappropriate relationships and risky behaviour.</p>

Supported accommodation	<p>Cat 1 – single accommodation - face to face support</p> <p>Cat 2 – shared 2-4; face to face support</p> <p>Cat 3 – Outreach</p> <p>Cat 4 – Shared 2+; sleep in staff on site; tailored daytime support; staff on call</p> <p>Cat 5 – Shared 2+ with staff on site 24/7 with tailored daytime support hours. Additional staff available.</p> <p>Usually group living for young people learning to live independently. May include 24/7 staffing for those with considerable need / vulnerabilities.</p> <p>Supported by their case workers/personal advisors, Staying Close workers</p> <p>4/7 staffed shared accommodation and support</p> <p>24/7 Staff shared accommodation and increased support</p> <p>Unstaffed with outreach</p> <p>Staffed provision, vary from the low support to high support</p> <p>Unstaffed with floating support</p> <p>Independent living with onsite support 24/7 to help with independent living skills</p> <p>Group Living - a number of young people living together in a home with shared facilities such as a kitchen and bathroom, with staff on-site providing direct support</p> <p>Self-Contained accommodation - apartments in a building block in which young people do not share facilities but staff have an office by the entrance and provide a various support or a set number of hours support</p> <p>Independent Living – where young people have their own accommodation in a solo flat and have set support provided</p> <p>Block contract for supported accommodation – 4 young people in a group provision with staff on site 24/7 and a satellite flat nearby for 1 or 2 young people. Staff from the group provision provide floating support to the flat. The young people in the group provision receive support from the staff team who are available at any time but they have 5 hours of planned direct 1-1 support as a minimum.</p> <p>Block contract for supported accommodation – 5 young people in self-contained flats with one main entrance to the building. Support staff on site during normal working hours Mon – Fri with a concierge service (security) on site almost 24/7.</p> <p>Self-contained flats with a flat on the same site used by support staff who are there 8am – 10pm (no support overnight)</p> <p>Varies in size, from shared flats in larger “Foyer” style provision, to shared accommodation in smaller houses (4-5 beds). Levels of</p>
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support vary according to need, with all types of provision able to be scaled up or down as the needs of young people fluctuate.

Category 1 – solo accommodation with floating support, hours to be set by social worker

Category 2 – shared accommodation with floating support, hours to be set by social worker

Category 3 – outreach support only

Category 4 – sleep-in staff on site from 10.00pm to 7.00am each night, individual support hours to meet the individual Young Person's needs, Staff to be on call 24 hours to provide support if necessary. Unlimited hours of support where required.

Category 5 – staff on site 24/7 with individual support hours to meet the individual Young Person's needs, unlimited hours of support where required. Additional staff available to support individual Young People within the community. Waking night support.

Each YP has a licence/tenancy agreement and housing related support is provided as part of the arrangement.

Properties ranging from 2 beds for 1:1 support up to 13 beds with either 1 or 2 staff on duty 24/7, with the option to buy in additional hours should the needs of the young person require it. In all instances a minimum of 6 hours per person per week 1:1 key work is delivered alongside group activities.

Small providers who offer a range of supported accommodation ranging from high to low intensive, and provision (including therapeutic) for Unaccompanied Asylum Seeking Children (UASC). 16-25 year olds who are at risk of homelessness with lower level support needs. This includes 16 and 17 year olds. Commissioned 'support' typically includes Passport to Independence approaches to achieve and sustain greater independence in accommodation, employment and health and wellbeing.

Category 1 – Single occupancy accommodation + face to face support hours. Flexible support hours to meet the needs of the young people.

Category 2 – Shared accommodation for 2-4 young people + face to face support hours. Flexible support hours to meet the needs of the young people

Category 4 – Shared 2+ with staff on site overnight + face to face support hours during day. Unlimited hours of support where required to meet the needs of the young people

Category 5 – Shared 2+ with 24/7 staff on site and 24 hour support. With unlimited hours of support where required, plus additional staff available to support individual young people within the community

	24-hour staffed and semi-independent schemes
Semi-independent	<p>At least one member staff on site on a 24/7 basis and there is up to 10 hours per week key work sessions on an one to one basis 24 hr staff presence and a minimum of 7 hrs direct one-to-one support for each young person</p> <p>Live-in staff</p> <p>Shared or solo semi-independent placements with different levels of day time support</p> <p>Provides support, sometimes quite intensive support, that can be reduced over time</p> <p>Support coming in at set times to complete tasks with the young person which could include budgeting, shopping, bill paying etc;</p> <p>Accommodation with a set number of flats, with a support staff in one of the flats - which are used as the office</p> <p>A row of self contained lockable rooms with communal spaces including kitchen, bathroom and living room. Staff member on site 24/7 with sometimes additional floating support if needed.</p> <p>The provision accommodates young people 16-21 in a mixture of small shared and solo units, usually with staff onsite 24/7 (in a sort of concierge type arrangement) but also sometimes with visiting keywork support only, or day/night staffing.</p> <p>Includes supported placements that have 24-hour onsite staff, shared accommodation with different levels of day time key worker support and independent accommodation (ie. stand alone units) with floating/visiting support.</p>
Solo provision	<p>We have a high number of small solo properties with sleeping in staff this is not ideal and does not really support young people to independence</p> <p>Accommodation to be staffed 24 hours per day, 7 days per week</p> <p>Floating support</p>

	YP is placed in a house within the community with a constant staff team that is available to support 24/7. Generally for YP with complex needs and as a result may display violence/aggression, risk of Child Criminal Exploitation, etc. These YP cannot be matched to our existing services.
Tenancies	Floating support Care Leaver's own tenancy with floating / visiting support Floating support approx. 5-10 hours per week
Supported living	No overnight support and visits ranging from three days a week to every day. Individuals have a licence or tenancy with one provider and support is commissioned from another Emergency and short stay – Supports young people with complex care needs and help them to maintain their tenancy, improve their health and wellbeing and promote their independence. Deliver interventions to support young people with complex care needs; learning disabilities; autism; physical disability; sensory disability; mental health (functional); youth offending.
Shared accommodation	Face to face support hours as required Sleep in staff on site from 10.00pm to 7.00am seven days a week, individual daytime support hours to meet the individual young person's needs, which must include a minimum of 2 hours face to face support per week. Staff to be on call 24 hours to provide support if necessary. Staff on site 24/7 with daytime support hours to meet the individual young person's needs, which must include a minimum of 2 hours face to face support per week. Additional staff available to support individual young people within the community. Staff present 24 hrs / 7 days a week or with a 24 hr on call service Staffed by supervisory staff or support workers 24/7 Dispersed properties within the community with a package of floating support, tailored to the YP's need. Each YP will receive support sessions at their property, between 3 and 5 hours per week in line with Pathway Plans and Valuing Care profiles.
16 plus provision	The provision which we commission varies from a few hours support per week to 24/7 support where there is a plan in place to reduce that support.
Foyer	It is not clear whether the consultation proposes to apply national standards and regulation to wider services, for example, Foyers, that accommodate 16-25 year olds which includes 16-17 year olds. Some children in this accommodation may receive 'care' from an offsite provider.

Shared lives	<p>Where a young person with a disability wants to stay with their foster carer under staying put policy then the carer will automatically move over to our shared lives service</p> <p>Regular visitor or host family who are shared lives carers - Young adult (16+) who needs support and/or accommodation is a regular visitor to, or moves in with, a registered Shared Lives carer.</p> <p>Together, they share family and community life. Shared Lives is also used as day support, as breaks for unpaid family carers, as home from hospital care and as a stepping stone for someone to get their own place.</p>
Housing Related support and accommodation	<p>Self-contained accommodation for young people aged 16-18 with access to staff support 24/7 365 days per year</p> <p>Dispersed properties in the community, with a minimum of 5 hours direct 1:1 support per week</p>
Bespoke arrangements	We spot purchase when needed: Bespoke, solo supported accommodation
Crash pads	Staffed 24/7
Emergency accommodation	24/7 staffed
Group living as a type of semi-independent	A number of young people living together in a home with shared facilities such as a kitchen and bathroom, with staff on-site providing direct support
Group supported accommodation	self-contained accommodation within a wider support scheme with staff on site 24/7 in a main office.
High intensity	High intensity: 16/17-year-olds who are LAC or s.17 and have high support needs (11-24 direct hrs pw)
High needs	High needs: 16/17-year-olds who are LAC or s.17 and 18+ Care Leavers who have high support needs (15+ direct hours pw)
High support semi-independent	24-hour onsite staff,
Housing Related Support Funded Supported Accommodation Provisions	Meets the needs of Care Leavers who are waiting for an offer of social housing from their Local Housing Authority or those who need support to be ready for independent living.
Independent flats	Floating support for young people delivered by qualified key workers.
Lead worker support	A floating model of flexible support which follows the young person regardless of accommodation circumstances

Low lodgings	The term refers to landlords that have been DBS checked and received safeguarding training. This refers to a type of accommodation rather than support. We can separately commission floating support to manage a transition if required.
Night and Day stops	Emergency and short stay (7 – 14 nights) - Domestic dwelling includes furnished bedroom, use of toilet, bathing, and laundry facilities. Support provided prior to being rehoused and / or prior to becoming part of the Supported Lodgings scheme
Safe base	Emergency housing for up to 10 days when a YP presents as homeless, no care given, however, more intensive support to move YP on into a more permanent accommodation, or reconciliation move back home
Semi-supported	Shared semi- supported placements with 24 hour onsite support
Single occupancy supported accommodation	Face to face support hours as required. Stand alone accommodation out in the community with floating support
Staying close	A support plan is developed to identify what support is needed and when. Given the close proximity to the children’s home, the staff there lead on the support via drop ins, telephone calls, etc. alongside other services such as our Weekend Support Worker, PA and Social Worker visits.
Supported and Independent Living Services (SaILS)	Staffed 24 hours a day (with a concierge arrangement overnight). We expect a minimum of c.2 hours/week of direct support to be provided to a young person. Visiting-support; these are self-contained units that can provide a step-down from a core 24/7 service as a young person's independence, resilience, and ability to manage a tenancy improves. Dispersed visiting support; Floating support is provided by support staff and the level of support, assessed by the provider, will change based on the young person's needs.
Supported Living Plus	Shared house with daily support and sleep in staff on site 10pm till 7am.
Supported shared accommodation	Young People aged 16 - 18 and UASC Young People who are still seeking leave to remain. Shared accommodation for Young People over the age of 16 who need a high level of support to live independently rather than full-time care. The accommodation is staffed by supervisory staff or support workers who are present to provide advice and support to the residents.
Supported tenancies	Fully furnished properties that enable young people to experience a transition to independence prior to gaining their own tenancy. This

	can be a long term placement option or taster flat experience. Floating support is tailored to their needs.
Supporting People Young People's Accommodation	For 16 to 25 year olds who need accommodation in a supportive environment and have access to designated support to develop their independent skills, for help and guidance to develop themselves in education and training to gain employment. We have both a foyer and shared accommodation within this service.
Training flats	To test ability and independence skills before young people move to their own accommodation
Transitions Centre Service	A multi-agency transitions centre for young people who have been serially excluded; young parent accommodation; longer term supported accommodation' (for longer stays of up to 2 years to prepare for move-on readiness);
Volunteer host service	In-house [NB more details not provided. This is possibly similar to supported lodgings but not contracted through a separate provider]
Xroads	Homeless/care leaver who need very short term supported accommodation as a stepping stone
Youth hub	Preventative housing and wellbeing services (upstream service prior to any Part 6 or 7 Housing Act and Homelessness Reduction Act duties)

**Table 42: Question 24. Alternative models suggested by respondents**

<b>Model</b>	<b>Number of respondents</b>
LA monitored	26
Hybrid model	21
Children's Home Quality Standards	12
Individual setting	4
Light touch	4
Registration of managers	2
Self-assessment	1
CQC	2
Regional Registration	4
Ofsted/CQC	2
Intelligence based	1
Outcomes focused	1
Quality Assessment Framework	1
Tenancy Inspection	1
HHRs	1
HMO	1



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