

BECOME.

THE CHARITY FOR CHILDREN IN CARE
AND YOUNG CARE LEAVERS

Submission to the Department for Education consultation: Introducing national standards for independent and semi-independent provision for looked-after children and care leavers aged 16 and 17

July 2021

Become is the national charity for children in care and young care leavers. Our vision is that care-experienced people have the same chances as everyone else to live happy, fulfilled lives. Our mission is to help children in care and young care leavers to believe in themselves and to heal, grow and unleash their potential. We work alongside them to make the care system the best it can be.

Introduction

Become welcomes the opportunity to contribute to the consultation on the government's proposed national standards for independent and semi-independent provision. Given Become's role, we have responded to the questions most relevant to children in care and young care leavers, drawing on what young people with experience of care (and particularly independent and semi-independent settings) tell us about their experiences through our advice, support and participation activity.

Although we respond below to the questions included in the version of the consultation intended for charitable sector organisations, the content is based on discussions with care-experienced young people using many of the questions included in the version for children and young people. We are extremely grateful to everyone who spoke with us for sharing their time and expertise to support this response. Below, any indented and italicised text surrounded by quotation marks is a verbatim quote from a care-experienced young person who contributed to this response. We also encouraged and offered support to young people to respond as individuals directly to the consultation.

Executive summary

- We reject the Government's proposals in the strongest of terms. Establishing a separate set of national minimum standards for independent and semi-independent settings will establish a two-tier care system for children aged 16 and 17. The Government's plan to introduce this new regulatory regime is not in care-experienced young people's best interests, nor does it reflect what they tell us about the care and support they want to receive at this age in independent and semi-independent accommodation and other settings.
- Proposed indicators to differentiate between 'care' and 'support' are flawed and establish nonsensical contradictions with existing legislation and guidance. The views of care-experienced young people below clearly illustrate that both 'care' and 'support' are required regardless of the type of setting in which they live.
- Young people have told us they view the proposed national standards as vague, dehumanising, and unsuitable. They omit a number of crucial elements of necessary care for young people in vulnerable situations, including support with education, understanding and developing positive relationships, meeting healthcare needs, and ensuring their wishes and feelings are heard and acted upon.
- We maintain that the inclusion of independent and semi-independent settings within the existing children's homes quality standards, with modifications where required, is the best way forward. This aligns with what young people tell us about how they want the level of care and support they receive at age 16 and 17 to be maintained whilst respecting their growing independence and autonomy.

"The standard of care and support for a young person shouldn't be different no matter where you're living. I personally think people who are in supported accommodation and hostels need that extra bit of care and love and support. Being there for them, being an ear to listen to. I feel like they're missing the point. These are children. You would want them to have consistent support and levels not to differ. It should be the same all the way through. It shouldn't be different for one child to another. I really hate that."

Our response

The difference between care and support – are we using the right indicators?

1. To what extent do you believe that each of these indicators is helpful in determining whether a provider is delivering ‘care’ or ‘support’?

1.1. For each indicator listed: *‘Very unhelpful’*.

2. Please explain your answer.

2.1. The purpose of these indicators is to distinguish between ‘care’ and ‘support’, a distinction which we do not believe is in the best interests of children in care and care leavers, nor reflects what young people tell us about the help they want to receive regardless of the setting in which they live at age 16 or 17.

2.2. The needs of young people cannot be neatly separated into two categories based on these or any indicators. Experiences in care (and of life as a young person at this age especially) are inherently messy, contradictory, and completely individual. Young people’s circumstances and vulnerabilities can change considerably in short spaces of time, and the proposal to create two unequal tiers with a set of differentiating indicators does not reflect this.

2.3. Some of the proposed indicators are clearly nonsensical and paradoxical when compared to existing legislation, guidance and practice both within and beyond the care system. For example, guidance accompanying the Children’s Homes Regulations already notes that children should be given an appropriate degree of freedom and choice in relation to day to day arrangements for their care, including personal items such as clothing.ⁱ Even at 16 or 17, children currently living in semi-independent and independent settings very rarely have full control of their finances as the placement cost is typically met on their behalf by the local authority under their duty to accommodate each looked after child.ⁱⁱ Even adults accommodated in supported housing who are in receipt of benefits often don’t have full control of their finances as costs are covered in Housing Benefit being paid directly to the provider.

2.4. In contrast to recent government action – such as the extension of personal advisor support to age 25 and the introduction of Staying Put and Staying Close opportunities – which seek to extend aspects of care beyond age 18, the proposed indicators suggest young people leaving their supported accommodation placement should not be provided with any aftercare support by staff. The formalisation of non-care settings which are unable to provide ongoing support into early adulthood is a dereliction of the corporate parenting principles and significantly disrupts the valuable ongoing work of the Department for Education to improve cross-governmental support for care leavers.

2.5. To support our response to this question, we shared a small number of scenario examples based on some of the indicators listed with care-experienced young people and asked them to reflect on what felt appropriate at age 16 or 17 (hence the use of ‘he’ or ‘she’ or ‘they’ below in the quotes below). Not a single response from any person to any scenario provided a clear ‘yes’ or ‘no’ answer; all felt this would be dependent on each individual, the context of the setting in which they were living, the support they received from adults beyond the place they were living, and other factors, and rejected the idea of fixing rules in place to separate ‘care’ and ‘support’.

- 2.6. Although local authorities would continue to determine alongside young people where they should live within the proposed regulatory structure, those we spoke to felt the indicators were too simplistic and as a result unhelpful and redundant. In some cases following personal experiences of being placed in independent and semi-independent settings before they were ready and the failure of their corporate parents to listen to their views, some were concerned about the ability of local authorities to make these decisions in their best interests, especially given the awkward distinctions made in separating 'care' and 'support' within the indicators.

"It's about ensuring that there is a clear demonstration that the young person is being given all their options and not just accepted here at the first hurdle."

- 2.7. Some examples of the complexities around a selection of the indicators are offered below. Young people's responses clearly indicate the fallacy of introducing indicators which create a distinction between 'care' and 'support'; young people living in any setting need different approaches at different times appropriate to themselves as individuals and the situations they encounter. This can only be guaranteed by the provision of care. These responses also touch on areas missing in the proposed supported accommodation standards, explored further in response to question 8 below.

- 2.8. Are young people in charge of meeting all of their health needs?

"Anxiety was a big issue for me at that age and my foster family helped me a lot with being independent at the GP. They started off with helping me book and then eventually going to the appointments myself... At age 16, that where if there's something she doesn't know how to do it, she should get that support from a key worker. They should have a conversation with her at least to say 'these are the things you want to say' but can also step in to help during the call itself if they need to."

"Yes and no. When you have so many things going on it's hard – you're in supported accommodation for a reason. You might take ages booking the GP, and you need someone reminding you or booking for you, just like a parent would do. There does need to be that adult there who can step in and do that. But it depends on the person – there's someone who might kick off if you do it for them, so they can just be reminded."

"Would I be confident at age 16 or 17 being solely responsible for my own healthcare? No. Would my sister? Yes. If the young person wants to do that, then let them do that, but don't make it so they have to if they can't."

"The responsibility should be on the key worker, however with each individual they can be personable. I don't think one shoe fits all. This is the same with everything. It should be the professionals' responsibility to ring... but they can go to each young person and find out what works for that young person."

"Doing so is great character building and promotes independence, but I think at that age I'd have been quite scared to do so and I wouldn't expect a young person not to be consulted on it beforehand... You can't assume."

- 2.9. Do young people have full control of their own finances?

"At 16 or 17 you're in college, so if you're wise enough to travel to college, you should probably have full control. But of course they need key workers advising them what's what"

but not so much that's it's intruding. It's about making them aware so they can take that responsibility."

"I didn't have control of any finances until I got my first job, but I didn't know how to handle my money. If you're living in these situations in supported accommodation, you've got the leeway to be a bit irresponsible and order too many takeaways for example. It's something you have to learn the hard way sometimes. It's really important you do give that chance, but only you need to know how to do it."

"If he's in a spiral of bad habits and needs help then no."

"He should have control, but there needs to be an awareness that if you go out and buy a bag of weed you won't have enough for food. There needs to be someone there weighing up the consequences of the decisions they make. They shouldn't tell them how to spend it. We want that independence but there's needs to some kind of compromise. It's someone to keep an eye on it. Like a parent."

2.10. Do staff have any access to any medical records?

"If she has something where people need to know then yes, but the most they should know by default is what help she needs. She should have control over what they share. It should on a need-to-know basis."

"She needs to have control and give consent herself. Sometimes people can treat you in a certain way because they've read a file."

"The same rules that parents have got around accessing information should be the same rules that parents have got around accessing information because that's what they should be. They should be like parents. We shouldn't use that word but they should be like parents."

2.11. Can young people go out of the establishment without staff's permission?

"Up to the age of 18 I had to ask permission to go and stay at friend's houses and was still provided with curfews. Within that age you sort of feel embarrassed when your friend has a longer curfew."

"If I was to have kids of my own, for as long as they were under my roof, I'd expect them to let me know... I can laugh about it now, but at the time I wasn't aware of the danger."

"I don't think he should have to ask for permission, but he should make people aware."

"When you live with parents, that's what you should do. You expect your parents to know where you are."

"In my supported lodgings I had a 10pm curfew on weekdays. Sometimes there are too many restrictions and it can cause you to do things like run away or get in worse behaviours."

2.12. We do not believe that more strongly defining what is expected of independent and semi-independent settings – by establishing a separate set of regulatory standards for the purpose of preventing young people from accessing care when they need it – is the right way forward to boost their quality. Some of the best experiences young people share with us about their time in independent and semi-independent settings are examples of where the provider has gone beyond what is seen as 'support' to – illegally – provide 'care'. The confusion identified by the Government around the distinction between 'support' and 'care' cannot be solved by

further attempts to define it; the idea of a neat distinction existing between the two is inherently flawed. This message was clearly articulated in our response to the 2020 consultation on unregulated settings which argued against the introduction of a separate set of national standards.ⁱⁱⁱ

Defining ‘unregulated’ independent and semi-independent provision – should we call all of this provision ‘supported accommodation for older children’?

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

No.

4. Please explain your answer, including any alternative suggestions.

- 4.1. In our conversations with care-experienced young people, all appreciated the difficulty of selecting something which sufficiently captured the variety of accommodation options covered.

“I feel 50:50 on it. It’s not the best words, but ‘supported accommodation’ is probably one of the best blanket terms you could use.”

“I want something nicer, but that still allows me to be quite independent there if I want to. It’s about a nice environment where people care about you.”

“It’s really just called a flat or a house. To separate them is quite difficult.”

“Maybe supported independence? It’s about having a safety net.”

“It’s good to an extent but it needs that bit more explanation. Supported transition to independence. It still gives that autonomy over your transition to your own independence?”

- 4.2. We are concerned about the use of ‘older children’ to separate children by age in a way which isn’t present elsewhere in the care system. It formalises and validates placing children routinely in independent and semi-independent settings, a practice which has arisen not as a deliberate choice in response to what young people want, but as a symptom of a lack of regulated residential capacity. We believe this will further embed a damaging precedent in care and establish an additional ‘cliff edge’ akin to that experienced by young people when they cease to be looked after, typically at age 18.
- 4.3. All children (i.e. those under the age of 18) benefit from a set of rights and protections under the UN Convention on the Rights of the Child and domestic legislation and guidance which dictates the care they can expect to receive as a looked after child. Children living in foster care, children’s homes or other settings do not experience a change in the care or support they receive at age 16.

“I’m not sure how I feel about ‘older children’. 16 and 17 is a bit of a weird age because you’re moving from being a child to being a young person. I don’t know if using ‘children’ is quite the right term, but at the same time, a lot of people look at 16 and 17 and don’t think they need to concern themselves as much. There’s a psychological thing there that tells people they’re still not adults which could be good.”

- 4.4. Some young people told us they felt the term ‘supported accommodation’ was stigmatising; it wasn’t a term they would be comfortable using with friends, for example. There were concerns about introducing additional terms which marked care-experienced young people out as ‘different’ to their peers, a common experience through their time in and leaving care.

“When you say to some people you live in supported accommodation, they ask ‘what are you being supported for?’. I never liked to say that I lived in supported accommodation at the time as it gave me that vulnerable status.”

“Supported is a nice word but there are some negative connotations. It might not feel good to say you’re in supported accommodation.”

“I wouldn’t say it to my friends. I’d feel embarrassed.”

- 4.5. We look forward to reading responses to this parallel question from the children and young people’s survey and urge the Government to listen to young people’s suggestions when deciding what independent and semi-independent settings may be collectively named if a change is pursued. If settings were to be included under existing Children’s Homes Regulations (potentially with modifications as is already the case for secure children’s homes and short break care, for example^{iv}), an umbrella term such as ‘homes for children and young people’ or ‘residential care for children and young people’ may work to capture the mixed portfolio of different residential options which all provide care, although we urge that further consultation on this with young people would be necessary.

What does the best of this provision look like?

5. **Please provide examples of the types of independent or semi-independent provision that exist in the sector. For local authorities responding, this may be types of provision that you commission or, for providers, this may be a description of the service you offer. We are keen to hear a range of perspectives on this. These may be broad categories of provider types or bespoke examples. Please provide as many details as possible, including:**

a) What do you call the type of provision(s) that you use/deliver?

b) Could you tell us about the provision, including who the provision accommodates, and how the needs of those accommodated are met through different forms of support?

c) What are the positive features and characteristics of the provision that you would want to retain in future?

d) What are the negative features and characteristics of the provision that you would not want to retain in future?

- 5.1. At present, many care-experienced young people live alongside other adults in independent and semi-independent settings who are there for different reasons, for example to receive help for recovery from substance misuse or due to mental health difficulties. Young people have told us this can create a number of problems. For 16 and 17 year olds especially, they felt it was important that children in care and care leavers were able to receive the specific support they needed in a setting where they were supported to live alongside others with shared experiences.

“We lived with someone who was really struggling with their mental health and we got into conflict with that person. I was surprised to see that the semi-independent settings were

mixed and that he wasn't somewhere specifically for those with mental health difficulties. We had to be mindful around that. We weren't aware."

"Some of the semi-independents aren't proper semi-independents as you're surrounded by other adults. The place needs to focus on what you need to do at 16 or 17."

"I was moved to a place with a mum and two children, others who were drug addicts. It wasn't a conducive place to studying. It's not a positive environment. If you've come into care then you've been taken out of a negative situation – you shouldn't just go into another one."

- 5.2. It is yet unclear as to how new regulatory standards for children in care and care leavers aged 16-17 would be enforced within a setting that also accommodates adults, particularly where the expectations of care and support differ. Paradoxically, the national statement of expectations for supported housing for adults published in October 2020 includes an expectation that it meets its residents' health, care and support needs.^v

6. 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?

- 6.1. No.

7. Please explain your answer.

- 7.1. Respecting a young person's growing autonomy and listening to their wishes and feelings about the level of care or support they want to receive does not necessitate placing them somewhere that does not, and legally cannot, deliver care. Recognising that some young people do prefer independent and semi-independent settings does not require denying them the opportunity to receive care when they need it. As noted above, young people's needs and circumstances can change, and providers and their staff need to be able to adapt and adjust the level of care and support offered as needed in response. This is already the case currently for children living in other care settings, such as in foster care or children's homes.

"People working in supported accommodation need to be trained to decipher how to react with different individuals and figure out what level of support they need."

"There's a safety net, that's what it needs to be. We need to know that if something bad happens, we're not on our own. If we lose a job or our mental health goes down the pan, we need to know there's something there."

- 7.2. To support our answer to this question, we asked care-experienced young people about what it meant to be aged 16 and 17 – what was different about this age and what was similar to the years before, and what might change in the care or support they expect to receive? They told us emphatically that they did not want to see an additional 'cliff edge' introduced into the system which dictated what they should or should not receive based solely on their age.

"Yes there's a difference, but it's not that big. You're still a vulnerable person, you're still not an adult, you've still been through the care system. To be told at age 16 that you don't get any care isn't right."

"It's just another way that the system neglects us. There needs to be more of a gradient where you go from the care you get when you're in care, and then by the time you're turning 18 it can be more like support. I don't think the government understand this."

“There’s that societal thing with being 16 which means you’ve got a bit more responsibility. Suddenly you’ve actually got some choice. Life’s a bit serious now, you’re not really a kid now. There’s a bit of an independence feeling which hits you.”

“At 16 and 17 yes you can live on your own and you’ve got that freedom and independence, but looking back to myself, I was just broadening and thinking about others then.”

“At 16 and 17, you kind of think you know it all so you need people to look up to, who you see as role models. You still need that consistent person there that shows they care. There are going to be boundaries, but the consistency of someone who cares is important at any age.”

“Moving into semi-independent needs to be less of a shock, but this isn’t always possible in places like hostels or without much key worker support. In my supported lodgings placement, it was just one woman living in her house. It started off with her cooking meals with me in mind about half the nights in a week. You’ve not got the weight of doing it every night. She would ask if I needed help with my washing if she had some space. It reminded me of the things I then needed to do which you just don’t consider. It’s having those little reminders and in-between things you do to care and support that young person. That can gradually loosen off as you get to know that person.”

“My foster mum had that trust. She would give a knock, she’d never intrude, but she’d keep on top of those kind of things.”

“16 and 17 year olds are getting a bit older, they’re getting a bit more independent, they’re pushing away, but I think they need to give them that bit of freedom but still be there like a parent.”

Introducing national standards for independent and semi-independent provision that accommodates 16 and 17 year old looked-after children and care leavers.

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

- 8.1. Yes. The proposed national standards omit a number of essential aspects of high-quality care and support present within existing standards for both children’s homes and fostering.
- 8.2. We maintain that the starting point to understand what care and support in independent and semi-independent settings should look and feel like for young people is the existing children’s homes standards. Children’s homes predominantly care for young people aged between 14 and 17 years old^{vi} and quality standards were developed alongside this age group. This is backed up by what care-experienced young people told us about the nature of what changes for them at the age of 16 and 17 and what doesn’t (see responses to 7.2 above). What is described above and below – and what young people want and expect to receive at this age when living in care – looks like **care**.
- 8.3. We asked care-experienced young people to compare and contrast the proposed national minimum standards for supported accommodation with the existing children’s homes quality standards to understand what they liked and didn’t like and what felt missing in either set of standards, and what they felt might need adapting for 16-17 year olds living in independent or semi-independent settings, if anything

- 8.4. Generally, they felt the draft supported accommodation standards positively recognised the individual needs of each young person and that support should be tailored to them. This was seen as particularly important for the 16-17 age range as it marks a period of often significant change and development.

“It’s not quite bespoke but in a way it’s created to the young person. Every young person is different and will be at different stages.”

“They seem to have a good amount of information surrounding it, in terms of the different pockets of support that are implemented.”

- 8.5. However, all of those we spoke to were concerned about the lack of specificity and detail, and the risks this could create for a young person who would live in settings governed by these standards.

“It’s very surface. It’s very vague.”

“It’s very, very basic. It’s just a given. It shouldn’t have to be written down.”

Accompanying this, all didn’t feel the standards went far enough to describe what a good standard of support would look like. Some raised their concerns that poorly-written standards would continue to provide too much flexibility for providers and local authorities to interpret how they wanted to, resulting in them ‘getting away with what they could’ and delivering poor experiences for those living there.

“It looks as though they’re just trying to meet minimum requirements.”

“It’s very, very basic. It’s just a given. It shouldn’t have to be written down.”

“Wow. This is just a landlord. All I see from that is just a tenancy agreement. It’s just so clinical. There’s no care. It looks like a tenancy agreement, not a home. You’re not doing anything for that young person, just making sure they’ve got a roof over their head...”

“This is so important it shouldn’t even be a question. This should just be a given. If you go into care at 15, 16, you tend to go into semi-independent. You’re a child about to become a young adult. Maybe you’re doing an apprenticeship or A Levels. You need this kind of support where someone is helping you figure out things.”

“It’s so bland and so dehumanising. It’s not got a human touch... Young people, they need more love and care. They’re going to be really mad when these young people are transitioning to being adults in society and they can’t function properly because they’ve not experienced what it’s like to have a proper life, to love and be loved and to show care and affection.”

“What I’m scared of with these standards is that if it’s not written word for word what they need to spend money on, including external providers that will support, then they will not spend that money... Consistency is important so nobody feels hard done by. They need to say ‘in every room, make sure there’s a chest of drawers, a wardrobe etc’.”

- 8.6. The use of words such as ‘good’, ‘adequate’ and ‘reasonable’ were flagged as problematic given experiences of different professionals’ interpretations of this previously which suggested they deserved only the minimum and played into a narrative of care-experienced young people as ‘undeserving’.

“When people hear children in care, they think a ‘good standard’ is the cheapest thing they’d never put in their own houses... You wouldn’t do that to a 16 year old child that’s visiting your home. But when people deal with care leavers they think they’ll just accept anything. They need to accommodate them and give them a choice, be inclusive.”

“What does a ‘good’ standard even mean? What’s a comfortable space? There should be a blueprint of what good accommodation is so there’s no grey area.”

“This is what they like to do. It’s how they can then turn around and say ‘oh, but two bags is reasonable’.”

(Re: provision of information pack and written agreements): *“It’s not ‘take this and go away’. That’s not the right attitude to have. It’s more someone actually sitting down to speak with you. It should be more accommodating. The message I got is they want to do the right thing and it’s an okay idea, but how’s it going to be implemented?.. For a young person, there’s so much going on it’s hard to digest all at once and know what means what. It’s too formal. There’s people using all these big words and they have all the power and I don’t know what’s going on.”*

“If you ask for something else, they raise their eyebrows and they act a certain way and it makes you feel uncomfortable. ‘You should be grateful’ – you wouldn’t put these things in your house, so why should I have to?”

- 8.7. Those we spoke to wanted aspirational standards which described what high quality accommodation looked like – not what the minimum expected should be. Young people said any standards could and should be adapted by staff in independent and semi-independent settings so that the focus was more on preparing young people to make decisions themselves and giving them additional freedom so it was important they didn’t start from a minimal basis; it was seen as easier and more helpful to start from a higher expectation of care and support and then reduce as needed, rather than put the onus on a young person to ask for more when they needed it.

“If that [supported accommodation standards] was to be merged with this [children’s homes standards], it would provide a really good framework. If they looked at these to help create the plan, maybe there would be things that needed to be reduced.”

“This one’s got a more parenting, loving sort of feeling to it whereas the other ones were talking about someone who wasn’t quite family, but still a corporate parent up until the age of 18.”

- 8.8. Some specific areas were identified as missing from the proposed national standards, particularly when compared to the existing children’s homes quality standards.

“The good thing with these is that they’re more specific and more thought out for people in care where you need that support.”

“I feel a lot of these should really be in. A lot of the time they go on about a step before going into proper independence, and that’s when you need all of this.”

“It feels like it’s wanting to elevate the young person a bit more, although it’s still a bit staff-orientated. A child is not a job.”

“I think there needs to be something that doesn’t feel as heavy as ‘complain’ – it feels quite daunting... It’s one thing that people maybe don’t really like to use or don’t use it because they don’t feel listened to from past experiences... Maybe ‘raise an issue’ or a council meeting?”

- 8.9. Educational support (i.e. ‘the education standard’) was seen as a crucial element of what high-quality supported accommodation settings should provide given the importance of education at this age.

“16 or 17 is an incredibly important age. That’s the age you’re deciding the direction for the rest of your life... I dropped out of education when I was 17 and went into supported lodgings. All they cared about was me getting a job. They didn’t care what it was as long as I was bringing in money. It was a supported lodgings placement but even the support didn’t exist.”

“I needed education support back then at 16 still into college. I knew college was my last stage of education so I had to knuckle down. I asked for a laptop but I wasn’t entitled to one anymore, even though my younger foster sibling was. There were only certain things that my foster carer could support me with.”

- 8.10. Understanding and developing positive relationships, and support to learn more about what mutual respect and trust looks like (i.e. ‘the positive relationships standard’), was emphasised strongly as requiring inclusion within any setting accommodating young people aged 16 and 17.

“You could have someone with a limited capacity to understand social constructs and situations. Some people can be 16 or 17 and have no idea what’s acceptable in relationships. This is the stage which is supposed to make you feel much more comfortable going into your first flat. It’s small things like that you’re not always taught.”

“It’s important to understand how to speak to people at work compared to those in your semi-independent. You really struggle to understand what’s acceptable behaviour when you’re in care.”

- 8.11. Many noted the importance of proactive care and support from professionals where they are living rather than the limited help articulated by staff in the current draft standards. What young people describe below is more consistent with ‘the quality and purpose of care standard’ which describes how staff provide personalised care that meet each child’s needs, and ‘the health and well-being standard’ which describes how staff should ensure each child has access to treatment and other services as they require.

“I had an issue when I moved into supported accommodation where I dropped all my mental health support as it was a 2 hour journey on public transport, and I had nobody to help me and try and get closer support. It should be key workers’ role to support with this. A lot of the time social workers or personal advisors don’t have enough time – they’re very pressed. Sometimes the people that you live with are the best ones to help. You have an expectation that they’re the ones who are supposed to support you with everyday things like appointments or job interview travel.”

“When I was younger I hated having professionals in my life. Hated it, hated it, hated it. But there’s a reason why I hated it so much. It’s because they were professionals. I had a couple of workers that I loved. There was one - she was like my godmother. She was my go-to... I

used to literally go and have McDonalds with her every evening because she was my safe person. Young people need an army of professionals, but their approach needs to be so different. It should be that care, that 'I'm here for you, I'm there to support you'. Really care and love that person."

- 8.12. Advocacy support was also identified as a vital element given the reduction in visible support for helping young people with articulating views, wishes and feelings when older in care.

"I'll mention it because it stands out. 16 and 17 year olds are still children and eligible to have an advocate who obviously pushes and supports the young person's views, wishes and feelings. It [the supported accommodation standards] didn't promote as confidently about supporting the young person's views, wishes and feelings. And I think that's important because what I've seen and what I've heard from my experience is that, once people turn 16 or 17, and especially if they've come out of foster care and gone into supported accommodation, they lose some of that representation and same support or guidance. They're still children, they're still learning. They don't need to be patronised but still have that same parenting technique. It still comes down to how do you want your own child at that age to be treated."

- 9. Are there any elements of the proposed national standards that you think would be difficult for providers to implement? If yes, why?**

9.1. n/a

- 10. Which elements of the proposed national standards do you expect would carry the most significant costs? Please explain your answer, providing estimates of cost where possible.**

10.1. n/a

- 11. 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.**

11.1. n/a

Introducing Ofsted-led registration and inspection of independent and semi-independent provision.

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

12.1. Individual-setting level registration and inspection would go further to ensure a consistent focus on the experiences of young people living there. They would enable more extensive conversations with children so the quality of the care and support they receive can be sufficiently understood and monitored.

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

13.1. n/a

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

14.1. n/a

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

- 15.1. Registration and inspection at the provider level takes a further step away from the everyday experiences of children living in independent and semi-independent settings. A provider-level approach divorces the inspection process from an understanding the lived experience of care and support for those living in such settings, and the associated monitoring of their protection and the quality of what they receive.
- 15.2. The consultation acknowledges the variety of settings and styles of support included within the independent and semi-independent sector. For providers who offer multiple different styles of settings, it would become increasingly difficult for Ofsted to adequately monitor and assess the quality of each, creating risks of poor quality establishments failing to be picked up.

16. If you think an alternative model would be appropriate, please explain this.

- 16.1. If all independent and semi-independent settings were to adhere to the existing Children's Homes Regulations, they would be registered and inspected twice a year at the individual-setting level and also benefit from additional Reg 44 inspections carried out each month by an independent person.

How often should Ofsted inspect settings and/or providers?

17. 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.

- 17.1. Please see response to question 16 above.

Contact

For further information, please contact:

Sam Turner, Policy and Participation Manager, Become

e: sam.turner@becomecharity.org.uk t: 07425 996 668

ⁱ <https://www.gov.uk/government/publications/childrens-homes-regulations-including-quality-standards-guide>

ⁱⁱ <https://www.gov.uk/government/publications/children-act-1989-care-planning-placement-and-case-review>

ⁱⁱⁱ <https://www.becomecharity.org.uk/for-professionals/resources/response-to-consultation-on-unregulated-accommodation-2020/>

^{iv} <https://www.legislation.gov.uk/ukxi/2015/541/contents/made>

^v <https://www.gov.uk/government/publications/supported-housing-national-statement-of-expectations/supported-housing-national-statement-of-expectations>

^{vi} <https://www.gov.uk/government/publications/childrens-homes-data-pack>