

**Submission to the Department for Education consultation: Regulating supported accommodation for looked after children and care leavers aged 16 and 17**

January 2023

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**

The Department for Education (DfE) public consultation on regulating supported accommodation for children in care and care leavers aged 16 and 17 was held open for just six weeks, including over the Christmas period. This restricted timeframe has meant that we have been unable to meaningfully consult or engage children and young people with lived experience of supported accommodation in responding to the consultation; and we know that this timescale has prohibited meaningful engagement with young people for several other charities and organisations across the sector.

Although the DfE published a young person’s version of the consultation, this still required children and young people to read several technical documents to be able to respond to the consultation. We are concerned that children and young people with lived experience of supportive accommodation have not been adequately supported to respond to the consultation and to feed in their views. When it comes to understanding the care system, care-experienced young people are the ones who understand it best. Their experiences, views and opinions should be crucial in the development or evaluation of policy.

In 2021, we raised concerns with the DfE about the timescales of its previous consultation on the regulation of supported accommodation for 16 and 17 year olds, leading to the Department extending the consultation deadline. We are disappointed that the DfE have rejected requests to extend the consultation period for this current consultation.

In responding to the consultation, given our 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. Our current response has been informed by previous engagement that we carried out with young people with lived experience of supported accommodation in 2020 and 2021, which informed our responses to the DfE’s previous consultations on supported accommodation. You can read our previous responses [here](https://becomecharity.org.uk/become-the-movement/our-campaigns/pushing-for-care-in-unregulated-settings/).

**Executive summary**

* We reject the Government’s proposals to introduce regulations for supported accommodation settings for 16 and17 year olds that do not provide care in the strongest of terms. Establishing a separate set of national minimum standards for 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.
* We are concerned that the Government’s proposed regulatory regime will legitimise and formalise the use of semi-independent accommodation for 16- and 17-year olds. In turn, this risks bringing the care cliff experienced by many young people leaving care forward from age 18 to age 16. The legitimisation of semi-independent settings for children in care, without care, undermines the realisation of the corporate parenting principles and the UN Convention on the Rights of the Child.
* Young people have previously 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 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.
* We remain unconvinced that some of the proposed types of supported accommodation settings are at all appropriate in keeping children and young people safe, ensuring that their needs are identified and met, and meeting all of the criteria contained in the proposed quality standards. Moreover, semi-independent settings are not conducive to providing the stability, permanence, and supportive, loving and sustainable relationships that care-experienced children and young people need to recover, grow and thrive.

**Our response**

1. **To what extent do you agree with the proposed ‘Leadership and Management Standard’ and supporting guidance?**

1.1 Do not agree

1.2 Young people have previously informed us that the proposed quality standards 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.

1.3 The proposed ‘Leadership and Management’ standard for supported accommodation echoes the ‘Leadership and Management Standard’ in the Children’s Homes (England) Regulations (2015)[[1]](#endnote-2), although this is weaker due to the practical limitations of semi-independent settings. However, we think that the ‘Leadership and Management’ should be much broader to reflect the other vital elements of care and support that children and young people may need in these settings, and to enable children and young people to have confidence in the organisation providing them with their accommodation and support. The standard should demonstrate:

* **The importance of children and young people being involved in decisions that affect their day to day lives, and welfare – including how children and young people will be meaningfully involved in decisions about the support that they receive, day-to-day living in the supported accommodation, and their level of autonomy.**
* **How the provider will support children and young people to access a variety of activities that meet their needs, and develop and reflect their creative, cultural, intellectual, physical and social interests and skills – either through supported accommodation or within the wider community.**
* **How the provider will support children to meet their educational potential and to fulfil their aspirations in regards to education, training, skills and career development.**
* The support that will be provided to identify and ensure that the health and wellbeing needs of children are met, including advice on healthy lifestyles, self-management, and connecting children to further advices, support and health services as required within the community.
* The support that will be provided in relation to care-planning, developing skills for independence, and identifying and fulfilling aspirations for adulthood.
* The support that will be provided to help children to develop, benefit from, and maintain sustainable long-term relationships based on mutual respect and trust.
* How change in the home will be managed and communicated to children living their, including change relating to the support provided in the home, changes in processes or changes in staffing.

1.4 The confidence that children and young people have in the organisation, management and staff providing their support and accommodation should be central to any inspection. As part of inspections, it is important that Ofsted hear directly from children and young people when assessing the ‘Leadership and Management’ and other standards.

1. **To what extent do you agree with the proposed ‘Protection Standard’ and supporting guidance?**

2.1 Do not agree

2.2 It is essential that robust safeguarding and protection processes are in place in any supported accommodation setting to ensure that children are and feel safe, and have their needs met.

2.3 Young people who we have spoken to have highlighted the risks and negative experiences that they have faced when living in shared accommodation, as children, with vulnerable adults: including alcohol or drug abuse; risky, sexualised or anti-social behaviour. We do not think it is appropriate for children aged 16 or 17 to be moved into shared-accommodation settings with vulnerable adults, or vice versa. Within the ‘Protection Standard’ it makes clear that all staff are required to have a DBS check, however this is not stated as a requirement for other adult residents who are living with children in a shared accommodation setting.

2.4 Children living in supported accommodation settings may be at an increased risk or loneliness, isolation, or stigma, all of which can have a negative impact on their mental health. The support provided in supported accommodation should include ensuring a trauma-informed approach and policies, and making residents aware of mental health and emotional wellbeing support services.

2.5 The use of any form of restraint can cause physical or emotional harm, and can have a greater disproportionate impact on children. There is also a risk that restraint can be traumatising, or re-traumatising for children who may have experienced or witnessed abuse or violence in the past. The guidance and standards should include a number of additional safeguards against the use of restraint, and in particular harmful or unlawful uses of restraint. We set these out in detail in our answer to question 9.

2.6 We think that the ‘Protection Standard’ should go further in highlighting a responsibility for the providers of supported accommodation to provide additional support to children aged 16 and 17 with issues related to their personal safety, such as in relation to cooking, fire safety, security, financial safety and online harms. Where children are living miles from home, there should be additional support to enable them to keep in contact or reconnect safely with friends, family are communities that are miles away – both in person and online.

1. **To what extent do you agree with the proposed ‘Accommodation Standard’ and supporting guidance?**

3.1 Do not agree

3.2 It is essential that all children live in accommodation, which meets their needs and rights, and supports their wellbeing and development. As part of our previous consultation, care-experienced young people have raised specific concerns about particular types of supported accommodation from their own lived experiences of these settings.

3.3 Many care-experienced young people live alongside other adults in 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. Some of the reflections from young people included:

* *“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.”*

3.4 We do not think it is appropriate for children aged 16 or 17 to be moved into shared-accommodation settings with vulnerable adults, or vice versa.

3.5 We welcome the commitment in the standards to ‘respecting children’s need for privacy’ and ensuring that every child is to have a bedroom ‘which is lockable and physically secure’. However, we share the point raised by the Together Trust, that it is unclear how registered managers and staff will be able to reasonably ensure that standards are being upheld in single occupancy accommodation, such as bedsits, where staff won’t have regular access.

3.6 Young people have told us about experiences of living in shared accommodation and not feeling as though they have any control over who visits communal areas – including stories of other residents having guests over and playing music loud into the night, when the young person had exams the next day. The accommodation standard should be clearer about who is able to visit communal areas, any curfews or restrictions, and how these policies will be monitored and enforced

3.7 The use of CCTV or surveillance cameras in supported accommodation settings risks breaching children’s right to privacy – article 16 of the UN Convention of the Rights of the Child.[[2]](#endnote-3) We think it is important that the same standards that are applied in children’s homes in relation to the use of CCTV are extended to supported accommodation settings: the use of CCTV should only be permissible at the direction of a court, or to safeguard an individual child’s welfare.[[3]](#endnote-4)

3.8 The formalisation and legitimisation of supported accommodation through the regulatory regime may lead to increased supported accommodation provision being developed. We are concerned that this provision will be developed in the cheaper area of the country for financial reasons, further skewing the provision of homes available for children in care, as highlighted by the report of the Competition and Markets Authority.[[4]](#endnote-5) A symptom of the skewed provision of homes is the increasing number of children being placed out of area, or miles from the people, places and communities that matter the most to them. It is essential that the new regulatory regime does not lead to more children being placed away from home and without the stability that they need to thrive.

1. **To what extent do you agree with the proposed ‘Support Standard’ and supporting guidance?**

4.1 Do not agree

4.2 The proposed introduction of national minimum standards for supported accommodation will create a two-tier system, with children aged 16 and 17 living in residential care able to receive greater levels of care and support, than those in supported accommodation settings.

4.3 It is essential that young people in supported accommodation receive high quality, tailored support. During our previous consultation with young people, they identified the following areas of support as being important to them, which are not adequately reflected in the support standard:

* **Supporting them to be involved in decisions affecting their lives and have autonomy where appropriate;**
* **Supporting them to share their views, wishes and feelings about the support available to them;**
* **Supporting them to access a variety of activities that meet their needs, and develop and reflect their creative, cultural, intellectual, physical and social interests and skills – either through supported accommodation or within the wider community;**
* **Supporting them to meet their educational potential and to fulfil their aspirations in regards to education, training, skills and career development;**
* Supporting children to identify and ensure that their health and wellbeing needs are met, including advice on healthy lifestyles, self-management, and connecting them to further advice, support and health services as required within the community.
* Supporting them to be involved in care-planning, developing skills for independence, and identifying and fulfilling aspirations for adulthood;
* Supporting children to develop, benefit from, and maintain sustainable long-term relationships based on mutual respect and trust.

4.4 The “young person’s guide” could be strengthened and enhanced to highlight processes beyond those that are listed. We think these should include: how the service is regulated and inspected; how young people will be informed of changes to the accommodation or support provision; and signposting to additional support available from the provider or external agencies, and organisations, which could include support relating to day to day living, such as cooking or financial management.

4.5 A lack of legal aid available for parents and families means that too often families also have limited understanding of, and information about, their rights and options where their older children become involved with the child welfare system. Without specialist advice it is almost impossible for families to understand where their child could be placed and what regulations, if any, a placement must follow. In the absence of legal aid, advice services by charities and other organisations, such as Family Rights Group’s advice service, [[5]](#endnote-6)play a vital role in enabling families to access independent advice about their rights and options. Organisations, such as Family Rights Group, have called for families involved with the child welfare system to have access to independent legal advice and advocacy, adequately funded by government.

* 1. Research shows that the care system too often breaks relationships for children and young people. Many are separated from their siblings, live far away from family and friends, and some experience frequent change in their living arrangements. Too often this leaves them isolated with few positive social connections beyond paid professionals. Older children can often find that their time in the care system leaves them without the networks and lasting relationships they need during childhood and as they transition into adulthood. Family finding support services, such as Family Rights Group’s Lifelong Links approach[[6]](#endnote-7) can support young people in the care system to build positive, lasting relationships that they can rely upon emotionally and practically during their time in care and into adulthood: improving their sense of identity and belonging. We support the recommendation from the Independent Review of Children’s Social Care that each local authority should have a high quality family finding support service, and we think that providers of supported accommodation should be able to connect children and young people to this type of support, as required.

1. **Are the Quality Standards or the Guidance missing anything that you would expect of any provider of supported accommodation?**

5.1 Yes

5.2 Young people have previously told us that the proposed quality standards for supported accommodation 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.

5.3 All children in the care system should live in settings that provides care, no matter where they live. We maintain that the inclusion of 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. We have expanded on elements of care and support that the quality standards and guidance are missing in our answers to questions 1-4 above.

5.4 We have previously asked care-experienced young people what they thought about previous iterations of the quality standards. Responses included that the standards need to be focused on young people, not “staff-orientated. A child is not a job”; and that young people actually need extra support as they prepare for independence – this isn’t the time that support should be removed.

*“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.”*

1. **Do you agree that this is the right approach to regulating mobile and non-permanent settings?**

6.1 No

6.2 We do not think it appropriate for children aged 16 and 17 to be living in mobile and non-permanent settings, such as caravans, barges and boats. This accommodation is designed to be crisis or emergency accommodation, and is totally unsuitable to keep children safe, meet their needs and support their wellbeing and development.

6.3 We have heard directly from young people about how unsuitable this accommodation is and have concerns about the ongoing use of this type of accommodation, including – unlawfully – for children under the age of 16.[[7]](#endnote-8) Bringing mobile and non-permanent settings into a regulatory framework would risk legitimise these settings and potentially lead to increased use of these inappropriate settings for 16 and 17 year olds.

1. **To what extent do you agree that this is the right approach to staff recruitment, checks, induction, staff fitness requirements, training and supervision and disciplinary proceedings?**

7.1 Do not agree

* 1. There should not be a two-tier divide between the quality of support and care that children living in children’s homes and those living in supported accommodation receive. Subsequently, we think it is important that the approaches and safeguards relating to staff recruitment, inductions, training and qualifications, and performance management in supported accommodation should reflect the equivalent guidance and regulations for children’s homes.[[8]](#endnote-9)
  2. We share the concerns of the Together Trust that the new regulations leave open the possibility of a single registered person running several different forms of varied supported accommodation, including bedsits, supported lodgings and shared accommodation settings. The registered person needs to be adequately trained and qualified to be able to run all of the settings for which they are responsible, and should be at least as qualified as those running children’s homes.
  3. Additionally, there are a few specific areas that we think the guidance needs to be clearer on in relation to the approach to staffing:
* How staff performance will be monitored and overseen by the registered person, and how the approach to staff performance will be inspected by Ofsted;
* How children living in supported accommodation will be able to raise concerns about staff performance or requirements to the registered person; or as part of Ofsted inspections;
* How young people will be informed about the approach to staff recruitment, training and development, and performance management; and how they can provide feedback in relation to this approach, such as highlighting a training need.

1. **To what extent do you think that the proposed approach to the service’s protection policies is the right one to ensure the welfare of young people in supported accommodation?**

8.1 Do not agree

8.2 Local authorities, working alongside partner organisations and agencies, have specific duties to safeguard all children in their area – up to the age of 18. There should not be a two-tier divide between the approach to safeguarding children living in children’s homes and children living in supported accommodation settings.[[9]](#endnote-10) Consequently, the approach to a supported accommodation service’s safeguarding and protection policies should mirror the approach for providers’ of children’s homes.

8.3 We recommend that if the regulatory regime is introduced, the guidance should explicitly include details about how any allegations against staff or other residents will be handled to strengthen safeguarding and protection policies.

1. **To what extent do you think that the proposed approach to restraint is the right one to ensure the welfare of young people in supported accommodation?**

9.1 Do not agree

9.2 The use of any form of restraint can cause physical or emotional harm, and can have a greater disproportionate impact on children. There is also a risk that restraint can be traumatising, or re-traumatising for children who may have experienced or witnessed abuse or violence in the past.

9.3 To safeguard against the use of restraint, and in particular harmful or unlawful uses of restraint, the guidance should make explicitly clear that:

* All staff should be trained regularly in the safe use of restraint and de-escalation techniques.
* Restraint should only be used as a last resort, after all relevant de-escalation techniques have been attempted; and only when there is a serious risk to the safety of the young person or another individual.
* Providers must carry out risks assessments and use trauma-informed approaches to mitigate the risks of restraint.
* Any use of restraint, must be in line with the requirements of the Equality and Human Rights’ ‘Human rights framework for restraint’. Notably that the best interests of the child must always be a primary consideration prior to any use of restraint; and that the use of techniques to inflict pain as a form of control must never be used.[[10]](#endnote-11)
* Records of restraint must include reflections from the child or young person on any self-reported injuries or harm that were the result of the restraint.
* Records of restraint should include reflections on what other measures could be taken to prevent the use of restraint in future scenarios.

1. **Do you agree that the proposed practices around producing, storing and maintaining records are proportionate and will ensure young people are kept safe and their needs are met?**

10.1 Not sure

10.2 The guidance should make it clear that children or young people living in supported accommodation should be notified any time that their records are transferred to another individual or organisation.

1. **Do you agree that the proposed practices around complaints and representations are proportionate and will ensure young people are kept safe and their needs are met?**

11.1 Not sure

11.2 The guidance around complaints and representations should make it explicitly clear that:

* Children and young people living in supported accommodation should be made aware of the complaints process for the setting, and this should include details of the Local Government and Social Care Ombudsman, or other options for further recourse if the child is unhappy with the response that they receive to their original complaint.
* Records of complaints that are shared with Ofsted should include details of the child or young person’s view on whether the complaint was resolved satisfactorily.

11.3 When we previously consulted with care-experienced young people about the quality standards for supported accommodation, advocacy support was identified as a vital element given the reduction in visible support for helping older teenagers in the care system with articulating views, wishes and feelings. One young person stated:

*“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.”*

1. **Do you agree that the proposed practices around notifications are proportionate and will ensure young people are kept safe and their needs are met?**

12.1 N/A

1. **Do you agree that the proposed business continuity requirements are proportionate and will ensure young people are kept safe and their needs met?**

13.1 N/A

**14. To what extent do you agree that the proposed roles and responsibilities of the ‘registered provider’ and ‘registered service manager’ will ensure a proportionate level of oversight in supported accommodation?**

14. 1 N/A

**15. Do you agree with the proposal to limit the number of registered service managers in each supported accommodation undertaking to one?**

15.1 N/A

**16. Do you agree that the proposals around the fitness and capacity of the registered provider and/or registered service manager are the right ones?**

* 1. N/A

**17. Do you agree these categories for supported accommodation are the right ones?**

17.1 No

17.2 We remain unconvinced that some of the proposed types of supported accommodation settings are at all appropriate in keeping children and young people safe, ensuring that their needs are identified and met, and meeting all of the criteria contained in the proposed quality standards.

17.3 Mobile and non-permanent settings, such as boats, barges and caravans, are inappropriate and wholly unable to meet the needs of children and young people aged 16 or 17, or to keep them adequately safe.

17.4 In answer to question 2, and in our previous consultation responses on the proposed regulatory regime for supported accommodation, we have highlighted the risks and negative experiences that children aged 16 and 17 have faced in shared accommodation when living with vulnerable adults: including alcohol or drug abuse; risky, sexualised or anti-social behaviour. We do not think it is appropriate for children aged 16 or 17 to be moved into shared-accommodation settings with vulnerable adults, or vice versa.

17.5 We are unsure how registered managers and staff will reasonably be able to ensure that the minimum standards are upheld in full in single occupancy settings, such as bedsits, whilst respecting children’s need for and right to privacy, and given that every child is to have a bedroom with a lockable and secure door.

**18. Do you agree with the proposal for providers to notify Ofsted of new settings and with the use of conditions to restrict providers from using new settings without having informed Ofsted?**

18.1 N/A

**19. Do you agree that the proposed Ofsted enforcement powers, offence provisions and tribunal appeal provisions are appropriate and proportionate for this type of provision?**

19.1 N/A

**20. Do you agree that this is the right approach to ensure provider adherence to the Quality Standards and the regulations across the service?**

* 1. N/A

**21. To what extent do you agree with the proposed new registration, variation and annual fees for providers of supported accommodation?**

21.1 Do not agree

21.2 We think that registration and inspection at an individual-setting level, rather than at provider-level, 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.

21.3 We think that registration and inspection at an individual-setting level, rather than at provider-level, 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.

21.4 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.

21.5 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.

**22. How would the new fees affect you as a provider?**

22.1 N/A

**23. Do you agree that this is the right approach to ensure that providers can register before it becomes an offence to operate supported accommodation undertaking without being registered and that inspections can be carried out in the first year?**

23. 1 N/A

1. **What do you believe any potential unintended consequences of these reforms will be?**
   1. Establishing a separate set of national minimum standards for 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.
   2. We are concerned that the Government’s proposed regulatory regime will legitimise and formalise the use of semi-independent accommodation for 16- and 17-year olds. In turn, this risks bringing the care cliff experienced by many young people leaving care forward from age 18 to age 16. The legitimisation of semi-independent settings for children in care, without care, undermines the realisation of the corporate parenting principles and the UN Convention on the Rights of the Child.
   3. Young people have previously 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.
   4. We maintain that the inclusion of 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.
   5. We remain unconvinced that some of the proposed types of supported accommodation settings are at all appropriate in keeping children and young people safe, ensuring that their needs are identified and met, and meeting all of the criteria contained in the proposed quality standards. Moreover, semi-independent settings are not conducive to providing the stability, permanence, and supportive, loving and sustainable relationships that care-experienced children and young people need to recover, grow and thrive, and have a positive start to adulthood.
   6. The formalisation and legitimisation of supported accommodation through the regulatory regime may lead to increased supported accommodation provision being developed. We are concerned that this provision will be developed in the cheaper area of the country for financial reasons, further skewing the provision of homes available for children in care, as highlighted by the report of the Competition and Markets Authority.[[11]](#endnote-12) A symptom of the skewed provision of homes is the increasing number of children being placed out of area, or miles from the people, places and communities that matter the most to them. It is essential that the new regulatory regime does not lead to more children being placed away from home and without the stability that they need to thrive.
   7. An additional unintended consequence is the lack of join-up across different areas of children’s social care policy, and the increasingly variable experiences, care and support that children placed in different settings will receive. For example, children who are in foster care at the age of 18 may be able to live with their former foster carers until the age of 21 through the ‘Staying Put’ scheme – and this may be extended further through the Government’s forthcoming response to the Independent Review of Children’s Social Care.[[12]](#endnote-13) However, for children in supported accommodation they won’t receive care, and may be expected to be living semi-independently by the age of 16, whilst still doing their GCSEs.

**Contact**

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