

**Looked After Children
& Complex Needs**

Placement Sufficiency Strategy

2019 – 2024

***Keeping children and young people safe
and giving them a great start in life***

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**Appendix 1: Looked After Children & Complex Needs Placement Needs Analysis
(October 2018)**

DRAFT

1. Vision and Principles

- 1.1 As a member of Herefordshire's Children and Young People's Partnership, the Council shares the vision to:

Keep children and young people safe and give them a great start in life

- 1.2 In achieving this vision, the partnership is committed to supporting the resilience of families to prevent avoidable entry or repeat admission, into the looked after system. It endeavours to ensure there is a continuum of services to address the range of needs so that families are equipped to appropriately care for, and meet the needs of, their own children.
- 1.3 When a child comes into care, the council becomes their Corporate Parent. This means it is the collective responsibility of the council, elected members, employees, and partner agencies, to provide the best possible care and safeguarding for the children who are looked after by us. As corporate parents, we have the same goals for the children we look after as those of every good parent; to see our young people flourish, to enjoy good health, to be safe and happy, to do well at school and to grow towards adulthood equipped to lead independent lives and to make their way as happy, healthy, successful and financially secure adults.
- 1.4 When a child or young person does become looked after, the following local principles inform how their accommodation placements are commissioned, planned and delivered:
- i. placements will be needs led and should enable looked after children to achieve positive outcomes as they grow-up
 - ii. most looked after children should achieve permanence, whether that be through reunification, special guardianship orders, or adoption
 - iii. children and young people are usually best placed in an appropriate and well-matched family environment, and the use of residential accommodation should be rare at less than ten placements
 - iv. looked after children and young people should normally be placed within 20-miles of their home in order to maintain contact with their family, education and community, unless it is not in their best interests to do so
 - v. placements will be stable, of good quality and cost effective

2. Two Page Placement Sufficiency Strategy 2019-2024



Children and Young People

What we know

- LAC population has continued to grow, 326 at November 2018
- Herefordshire could expect 180-220 LAC, compared to statistical neighbour rates, which are updated annually
- New entrants have recently slowed
- Ceasing LAC had not improved significantly by 2017/18, particularly for special guardianship orders (SGO)
- There are a wide range of needs
- Spending over £12.5m per year on placements

What we are doing

- 2018/19 LAC reduction plan implemented to improve SGO rates, expecting to achieve c.310-330 LAC by April 2019
- Embedding Early Help with partners
- Embedding new Edge of Care approaches
- Improving social care practice, management and leadership

What we expect to achieve

- LAC population could reduce to c.230-275 by 2024



Foster care

What we know

- Placements provided by in-house carers and Independent Fostering Agencies (IFAs)
- 92% of in-house and 64% of IFA placements made within 20 miles of home in 2017/18
- Usually 225-245 placements with in-house or IFA carers
- Annual spend c.£7m on all types of foster care
- In-house foster care at £550 per week is cheaper than framework (£780) or spot-purchase (£920) IFA placements, however higher costs can sometimes be driven by the needs of the child being placed
- In-house occupancy rates at 1.2 children per household (March 2018)
- 37 in-house kinship carers (March 2018)
- 107 general and specialist in-house carer households (November 2018)
- In-house/IFA bed night split expected at 63%/37% for 2018/19
- Estimate c.70,000 general & specialist nights provided in 2018/19

What we are doing

- Maximising opportunities for kinship care to reduce demand on in-house general and specialist foster care
- New in-house fostering marketing officer appointed in 2018 to drive carer recruitment efforts
- Implementing a robust in-house foster carer recruitment, retention and training plan that is informed by an up-to-date needs analysis
- Invest-to-save business case to grow the pool of in-house general and specialist foster carers
- Developing better relationships with local IFAs for easier access to local carers when necessary
- Participating in the recommissioning of regional agreements for the purchase of IFA placements from April 2020

What we expect to achieve

- 90% of general and specialist fostered LAC being placed within 20 miles of home by 2024
- Progress towards a 90%/10% split of in-house/IFA fostering bed nights by 2024
- Total of c.61-71,000 general & specialist bed nights provided in 2019/20, falling to c.50-60,000 by 2024 as LAC numbers reduce
- In-house capacity will improve to provide up to 170 general & specialist beds / 53,000 nights per year by 2024
- IFA nights to reduce to under 6,000 per year by 2024
- No children will be placed in residential care because there



What we know

- No in-house residential children's homes
- All placements are purchased from the independent sector
- 30% of mainstream LAC and 42% of complex needs residential placements made within 20 miles of home, March 2018.
- Annual spend c.£5.5m
- Usually 25-27 children placed
- Nationally and locally, more children have entered residential care in 2018/19 because of insufficient capacity in the in-house and IFA markets
- Estimate 5,700 LAC and 4,000 Complex Needs bed nights needed in 2018/19
- Ofsted noted the strength of the commissioned Herefordshire Intensive Placement Support Service (HIPSS) which aims to prevent step-up to, and support step-down from, residential care
- Children and young people can step-down to HIPSS, fostering, supported living or return home - 9 in 2016/17, 6 in 2017/18

Residential Care

What we are doing

- Ensuring in-house recruitment targets specialist foster carers to reduce reliance on residential care
- Strengthening strategic relationships with registered managers of local children's homes to improve access to vacant beds
- Developing additional relationships with new homes as they open in and around Herefordshire
- Joining new regional agreement for the purchase of residential placements from January 2019
- Consider short-term residential care as breathing space before a child returns home or to foster care
- Making a decision, by Spring 2019, regarding potential for block contracting or in-house provision

What we expect to achieve

- Less than 20 children and young people placed in residential care by 2024
- A higher proportion will be placed within 20 miles of their home
- Need for c.3,600 LAC and 3,700 Complex Needs bed nights per year by 2024
- In-house fostering service will maintain a pool of 8-10 specialist carers to support HIPSS approach



What we know

- Placements are provided by in-house 'hosts' and external agencies, Ofsted registration is not required
- Provides support to achieve independence
- Ofsted inspectors noted that care leavers live in good-quality placements and accommodation
- At least 104 LAC will transfer into the 16+ service over 2019-2024
- Estimated that c.30 LAC aged 16/17, and c.20 care leavers, will require supported living placements each year
- Estimated that 6,000-6,500 bed nights provided in 2018/19
- 32 in-house supported lodging beds

16+ Supported Living

What we are doing

- In-house hosts to be integrated with recruitment and retention planning for foster care
- Further refinement of needs analysis
- Joining recommissioned sub-regional supported accommodation framework agreement
- Completing commissioning of floating support / accommodation for young people with higher needs

What we expect to achieve

- Clearer projections of demand to inform evolving commissioning plan
- Increase in-house supported lodgings places (excluding dual registrations) available for LAC and care leavers
- High proportion of external agency placements are provided within 20 miles of the young person's home, education, or employment

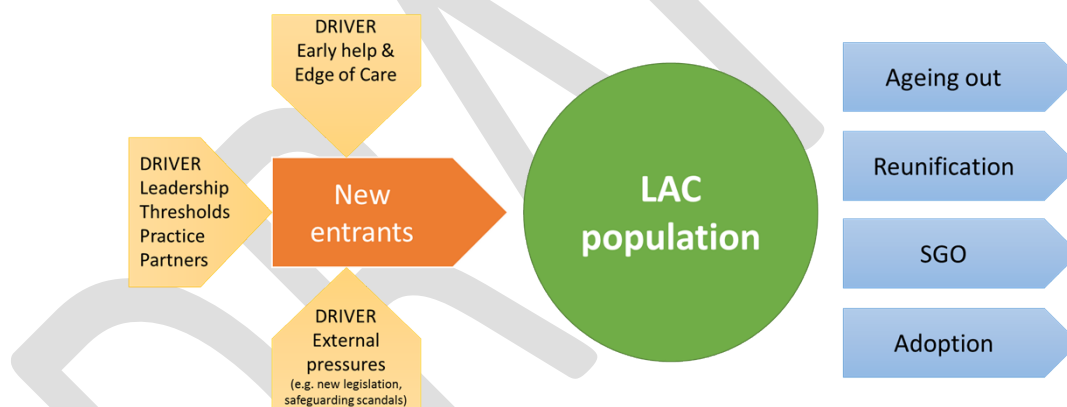
3. Background to the Sufficiency Duty

- 3.1 The purpose of this document is to set out what Herefordshire Council will do to ensure that there is sufficient accommodation of different types for our looked after children and young people (LAC). This sufficiency strategy has been informed by a needs analysis of the children and young people we look after (Appendix 1). The strategy is part of a whole-system approach that includes early intervention and preventive services to support children within their families, as well as better support services for children who become looked after.
- 3.2 Section 22G of the Children Act 1989 seeks to improve outcomes for looked after children and young people by requiring local authorities to take steps that secure, so far as reasonably practicable, sufficient accommodation within the authority's area which meets the needs of children that the local authority are looking after, and whose circumstances are such that it would be consistent with their welfare for them to be provided with accommodation that is in the local authority's area ('the sufficiency duty').
- 3.3 In complying with this duty, the Council seeks to do more than simply ensure that accommodation is 'sufficient' in terms of the number of beds provided. We will have regard to the benefits of securing a range of accommodation through a number of providers to ensure the accommodation meets the child or young person's needs. We recognise these needs can be wide-ranging and can require an holistic approach.
- 3.4 As a local authority, the Council is subject to a range of duties towards children within our area which are related to the sufficiency duty. In particular:
- Section 17(1) of the 1989 Act provides that it is the general duty of a local authority to provide a range and level of services to children in need (as defined in section 17(10) of the 1989 Act) and their families in the local area which are appropriate to their needs.
 - Section 20 of that Act requires local authorities to provide accommodation for children in need within their area who appear to them to require accommodation in accordance with the provisions of that section.
 - Section 21 requires a local authority to accommodate certain children who are either removed or kept away from home under Part V of the 1989 Act or who are subject to a criminal court order.
 - Section 22C (5) requires local authorities to place children in the most appropriate placement available. In determining the most appropriate placement for a child, section 22C (7) requires local authorities to take into account a number of factors (such as the duties to safeguard and promote welfare; promote educational achievement; ascertain the wishes of the child and family; and give due consideration to religious persuasion, racial origin and cultural background).
 - In determining the most appropriate placement for a child, section 22C(7)(a) also requires the local authority to give preference to a placement with a relative, friend or other person connected with the child and who is also a local authority foster parent.
 - Section 22C sets out the additional factors (in no order of priority) which the local authority must take into consideration when deciding the most appropriate placement:
 - allowing the child to live near his/her home;
 - not disrupting the child's education or training;
 - enabling the child and a looked after sibling to live together;
 - meeting the particular needs of disabled children; and
 - providing accommodation within the local authority's area, unless that is not reasonably practicable.
 - Section 23(1) (a) requires a local authority to provide accommodation for a child who is in their care (by virtue of a care order).

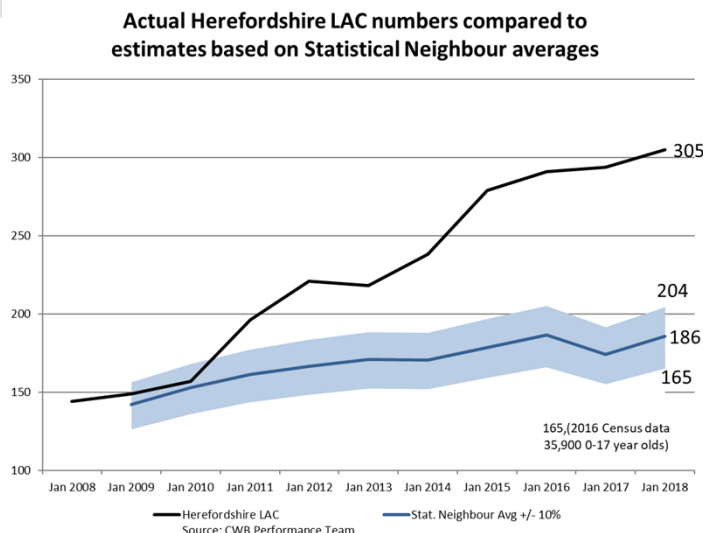
- 3.5 This strategy seeks to address the sufficiency, quality and sustainability of appropriate placement provision, as well as seeking value for money within the available resources. In this context, 'commissioning' represents the design and implementation of both in-house and externally provided services that are based on an analysis of local needs and evidence of what works well. The sufficiency strategy forms part of the Council's overall approach to commissioning services for children, young people and families and represents a key priority area.
- 3.6 The types of placements that this strategy considers include:
- Fostering: kinship arrangements, general or specialist in-house foster carers and independent fostering agencies (IFAs)
 - Independent residential children's homes or schools for looked after children and those with complex needs
 - In-house supported lodgings for 16+ looked after children and care leavers
 - Independent supported accommodation for 16+ looked after children and care leavers

4. Local Context

- 4.1 There are multiple factors that can influence the size and shape of Herefordshire's LAC population (below).



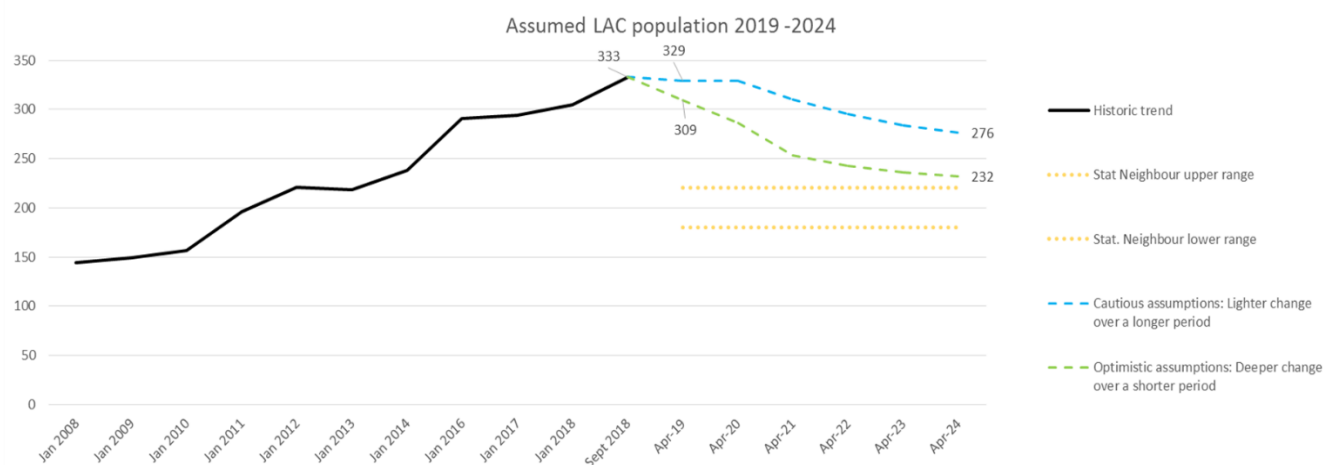
- 4.2 Compared to the average of its statistical neighbours (below), Herefordshire has had a higher number of looked after children than would be expected for its population of children and young people. At the end of November 2018, there were 326 Herefordshire children and young people looked after by the local authority.



- 4.3 In 2018, the Local Authority's children's social care services were inspected by Ofsted and judged overall as requiring improvement. The Council has implemented a range of action plans aimed at improving management and leadership to deliver consistently high quality social work practice so that children who need help and protection and those in or leaving care have good experiences and make positive progress. Among the planned wide-ranging improvements are evolving approaches to Early Help and Edge of Care. While these approaches are focussed on ensuring that children and young people receive the right support at the right time, they are also expected to have an impact on the size of Herefordshire's LAC population in the short and medium term.
- 4.4 Herefordshire's current Early Help model was implemented in 2016, with the number of families being supported growing since then. By November 2018, the number of completed Early Help Assessments had risen to over 900, with most cases being led by partner agencies. However, it has been recognised that the approach is not yet fully embedded and understood by all partners. Therefore, the Council is leading work with partners to develop and deliver a new Early Help strategy and rolling-out Early Help training to key frontline professionals. To further strengthen the Early Help Offer, the Council is expanding its dedicated team of family support workers and strengthening links with the MASH (Multi Agency Safeguarding Hub) with the recruitment of an Early Help Coordinator in MASH. Through these and future actions, it is expected that there will be:
- improved identification of families who require Early Help and will receive support at an earlier stage
 - improved signposting of Early Help resources for professionals and families
 - a more user friendly system for professionals and families so that they can help themselves
 - an increase in families who take up the offer of Early Help following no further action by social care
 - more partners supported to complete Early Help assessments
 - upskilling of partner agencies in the MASH and improved communication and knowledge about the Early Help
 - information immediately available for social care if cases step up
- 4.5 Weaknesses within the Councils' children's social care planning and decision-making processes have been identified. These include delayed or missed opportunities to develop care plans during the PLO (Public Law Outline) process, as well as foster-to-adopt placements are not being considered early enough and in all relevant situations when planning permanency for children. To help address these issues, the Local Authority implemented a new Alternatives to Care panel decision-making process in September 2018, which built on earlier appropriately targeted work to begin reducing the size of the LAC population. It is expected that the new panel process will deliver:
- clear expectations that result in sustainable change to enable children to safely remain in the care of their parents
 - improved timescales for achieving permanency for children
 - reduced demand for foster placements
 - increased number of foster to adopt placements
- 4.6 In terms of placement sufficiency planning, the inspection noted a lack of effective strategic direction and future needs were not articulated clearly. This was compounded by the current (2014-2019) commissioning strategy not being underpinned by a comprehensive

assessment of future needs. Work to refresh the 2014-2019 strategy and needs analysis was underway at the time of the inspection and has now been completed with the strategy set out by this document and Appendix 1. It is recognised that the level and type of need within the population is subject to dynamic change, the strategic needs analysis, therefore will be routinely updated so that strategy and actions can be amended as appropriate.

4.7 Based on local intelligence and assumptions of the impact of Early Help and Edge of Care work, and combined with comparisons against Herefordshire’s statistical neighbours, it is anticipated (October 2018) that Herefordshire could have c.230-275 looked after children by 2024 (below). There are a wide range of influencing factors that could pose a risk to the assumptions and projections, however, if these approaches are successful, Herefordshire’s LAC population will be brought into closer alignment with comparative areas. Close alignment, however, could be expected to take several more years. This analysis will be regularly refreshed to ensure that it continues to reflect local intelligence and published data as it is routinely updated.



5. Commissioning Intentions 2019-2024

5.1 A strategic placement sufficiency needs analysis (Appendix 1) has considered the historic and projected demand for placements. Key sufficiency pressures that have been identified are:

- i. growing use and higher cost of independent fostering agency placements
- ii. increased use of residential accommodation due to insufficient capacity in both general and specialist in-house and independent fostering provision
- iii. too many children and young people placed away from home/Herefordshire when their needs do not require distant accommodation
- iv. insufficient local provision of supported living arrangements for young people with higher needs
- v. robust commissioning of non-accommodation support services for children in need (CIN), children subject to child protection (CP), looked after children (LAC) and those with complex needs (CNF)

5.2 To help address these pressures, the Council is working to achieve the following commissioning objectives:

Commissioning objectives

- 1 Achieve a rate of 90% of general and specialist fostered LAC being placed within 20 miles of home and reduce reliance on independent fostering agencies**
- 2 Ensure that more children needing residential care can be placed ideally in-county, but no more than ten miles from the Herefordshire border , when it is appropriate to their care plan**
- 3 Improve the availability of local supported living arrangements for Looked After Children aged 16+**
- 4 Implement robust procurement arrangements for non-accommodation support services for CIN, CP, LAC and CNF**

- 5.3 The following commissioning plan sets out in more detail how these intentions will be achieved and measured.

6. Placement Commissioning Plan 2019-2024

Objective	Actions	Performance Measures
<p>1. Achieve a rate of 90% of fostered LAC being placed within 20 miles of home and reduce reliance on IFAs</p> <p>2018 Baselines:</p> <ul style="list-style-type: none"> ▪ 2018 In-house/IFA bed night split of 63%/37% ▪ As of 31 March 2018, 84% of general in-house and IFA foster care was placed within 20 miles of home. ▪ 92% of children in general in-house foster care placements are placed within 20 miles of their home. ▪ 64% of IFA placements are within 20 miles of child's home. ▪ In-house occupancy rates at 1.2 children per household (March 2018) and good placement stability ▪ 37 in-house kinship carers (March 2018) ▪ 107 general and specialist 	<p>a. Maintain a robust in-house foster carer recruitment, retention and training plan that will increase the capacity of kinship, general and specialist foster carers so that:</p> <ul style="list-style-type: none"> i. no children enter residential care when foster care is suitable to meet their needs ii. in-house foster carers increase their capabilities to support children more challenging needs, such as child sexual exploitation (CSE) etc iii. reliance on IFA placements is reduced iv. fostering costs are sustainable 	<ul style="list-style-type: none"> ▪ Progress towards a 90% / 10% balance of in-house/ IFA fostering bed nights achieved by 2024 or sooner ▪ monitor in-house occupancy rates against other areas ▪ in-house provision of at least 45,000, and up to 53,500 bed nights per annum by 2024 ▪ an in-house carer pool to provide up to 170 beds by 2024 ▪ carer pool includes at least 8 specialist Herefordshire Intensive Placement Support Service (HIPSS) approved carers in August 2019 ▪ maintain a pool of 8-10 specialist HIPSS carers from September 2019 ▪ zero residential bed nights purchased due to no available foster care
	<p>b. Maximise opportunities for kinship care by implementing processes to identify potential kinship carers at earlier stages throughout the safeguarding child protection processes and not only at point of accommodation</p>	<ul style="list-style-type: none"> ▪ Initial minimum of 20 kinship carers approved each year ▪ Further analysis of the potential scope for the use of additional kinship care
	<p>c. Monitor in-house carer capacity against projected need within the directorate's performance score card</p>	<ul style="list-style-type: none"> ▪ Demand and capacity is routinely overseen by the directorate's Senior Management Team (SMT)
	<p>d. Develop effective relationships with IFAs that have carers based in Herefordshire to ensure that agencies are aware of our needs and that we acquire regular updates on current and planned vacancies, so these could be considered for our young people, where applicable.</p>	<ul style="list-style-type: none"> ▪ facilitate at least one provider market development event each year ▪ at least 4 weekly contact with each local provider ▪ placements team receives regular vacancy updates from IFAs working in Herefordshire
	<p>e. Participate in the recommissioning of West Midlands Regional Foster Care Framework arrangements</p>	<ul style="list-style-type: none"> ▪ Local and regional decision, by September 2019, to recommission a new framework from April 2020

Objective	Actions	Performance Measures
in-house carers (November 2018)		
<p>2. Ensure that more children who need residential care can be placed ideally in-county, but no more than ten miles from the Herefordshire border , when it is appropriate to their care plan</p> <p>2018 Baseline:</p> <p>As of March 2018,</p> <p>30% of LAC residential placements were within 20 miles of the child's home</p> <p>42% of CNF placements were within 20 miles of child's home</p>	<p>a. Strengthen strategic relationships with registered managers of local children's homes in Herefordshire to ensure that they are aware of our needs for general LAC and Complex Needs accommodation and that we acquire regular updates on current and planned vacancies, so these could be considered for our young people</p> <p>b. Develop similar strategic relationships with residential children's homes and residential schools that could support children with complex needs in neighbouring counties</p> <p>c. Work with the Local Authority Designated Officer (LADO) to explore re-instating children's homes managers' forums</p> <p>d. Make a decision about joining the new regional residential flexible contracting arrangements for 2019 onwards</p> <p>e. Consider the potential for short-term 'breather' residential placements as an aide to preventing family breakdown or the breakdown of fostering placements</p>	<ul style="list-style-type: none"> ▪ facilitate at least one provider market development event each year ▪ at least 4 weekly contact with each local children's home ▪ placements team receives regular vacancy updates from children's homes in Herefordshire ▪ A minimum of 60% of all residential bed nights purchased are in-county or within 10 miles of Herefordshire's border, by 2022. Based on the active placements as of March 2018, 22% of LAC residential and 33% of CNF bed nights purchased were in county. <ul style="list-style-type: none"> ▪ Participate in design of new service specification and contracting arrangements by September 2018 ▪ Complete regional procurement exercise by November 2018 ▪ Make local governance recommendations and decision by December 2018 ▪ First new placements made under new arrangements from January 2019 <ul style="list-style-type: none"> ▪ Exploration of models and evidence from elsewhere ▪ If a model appears feasible, include in business cases described by actions f and g below

Objective	Actions	Performance Measures
	<p>f. Make a decision about potentially undertaking a mini-procurement exercise to block contract an initial number of residential beds (likely to be four with an option to increase later) in a home or homes in Herefordshire. The procurement could be completed via the regional FCA or directly by Herefordshire.</p>	<ul style="list-style-type: none"> ▪ Draft business case completed by February 2019 ▪ Governance completed by April 2019 ▪ Procurement completed by June 2019 ▪ Block-contract awarded from September 2019
	<p>g. Subject to the outcome of the procurement of block contract arrangements for residential beds, we will complete a business case for the development of a dedicated LAC and/or CNF children's home resource in Herefordshire, which could be delivered under contract by an external provider or managed in-house by the Council</p>	<ul style="list-style-type: none"> ▪ if needed, a draft business case will be prepared by October 2019
<p>3. Improve the availability of local supported living arrangements for Looked After Children aged 16+</p> <p>2018 Baseline: 32 in-house supported lodgings beds available</p>	<p>a. the in-house foster carer recruitment, retention and training plan will also address the capacity of in-house supported lodging hosts for 16-17 year olds, as well as care leavers, and identify why hosts tend to support only one young person at a time</p>	<ul style="list-style-type: none"> ▪ Up to 40 supported lodging beds (excluding dual registrations) available by March 2020
	<p>b. Complete detailed analysis of future demand to better inform supported living sufficiency planning</p>	<ul style="list-style-type: none"> ▪ Project demand by September 2019, based on known LAC that could step down to supported lodgings at age 16, 17 or 18
	<p>c. Continue to participate in sub-regional or regional supported accommodation framework agreements</p>	<ul style="list-style-type: none"> ▪ Decision regarding renewal/ recommissioning by January 2019
	<p>d. Make a decision, in conjunction with the Adult and Communities Directorate, about commissioning an external provider to provide either floating support or supported accommodation for young people with higher levels of need</p>	<ul style="list-style-type: none"> ▪ Decision made by May 2019

Objective	Actions	Performance Measures
<p>4. Implement robust procurement arrangements for non-accommodation support services for CIN, CP, LAC and CNF</p> <p>2018 Baseline:</p> <p>Since 2015 to March 2018, in the region of 320 individual assessments have been commissioned at a total cost of approx. £245k</p>	<p>a. Make a decision about joining a sub-regional direct purchasing system (DPS) for non-accommodation services</p> <p>b. Complete a needs analysis of non-accommodation services required by Herefordshire, identify any market gaps and actions to address</p>	<ul style="list-style-type: none"> ▪ Decision made by February 2019 ▪ DPS implemented from April 2019 ▪ Needs analysis and action plan completed by May 2019