

Date	Reference Number
16 th January 2020	
CHILDREN AND CULTURE DIRECTORATE	
Briefing Note for:	Corporate Parenting Board
Subject:	Unregulated Placements and "Children Placed at Distance"
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Background/Content

An unregulated (or unregistered) placement is an placement for a child under 16yrs in the care of the Local Authority (either S20 or full care order) in a home/establishment that is not formally registered and approved by Ofsted. As the establishment is not registered they are not subject to the checks and standards insisted upon by Ofsted, hence the reason for potential concern. Currently there is a significant level of media and professional concern about the growing number of these types of placement across the whole of the UK. There are a number of drivers which are linked to the rise of unregulated placements, some of the key reasons are:-

- An increase in the overall number of looked after children across England and Wales.
- The rise in the complexity of presenting issues for a cohort of young people in care, primarily this is driven by the improved understanding of 'County Lines' serious Youth Violence' Emotional Mental Health.
- The rise in the number of Private Equity companies who now own considerable numbers of fostering agencies and residential provision for young people in care.

The combination of all these factors has meant that the increased demand without a similar level of growth has resulted in placements becoming scarcer and more expensive. The overall effect of this has been that often, those young people with the most complex needs have been declined placements in regulated placements as the placements providers generally will take the placements which are less complex and less challenging. In turn this appears to have led to a position where some of the more complex young people have to then be placed within unregulated provision.

Local Position

Currently we have 3 young people in unregulated placements. All 3 of these young people have complex backgrounds and challenges which has meant that trying to place them in Ofsted registered accommodation has proved difficult ; however each of the young people have made progress whilst these placements.

By the end of January 2020 two of these young people will have turned 16yrs which formally means that the placements will no longer be classified as unregulated.

Oversight of Unregulated Placements

All of our unregulated placements continue to be reviewed by our Independent Reviewing officers every six months just as any other placements. This provides an opportunity for independent scrutiny in relation to the quality of the placement, whether it meets the needs of the young person and to obtain the views, insights wishes and feelings of the young person.

The requirements for the Social Worker to visit an unregulated placement in LBTH are considerably more stringent than other placements, with a requirement for weekly visits by the Social Worker.

Prior to any unregulated placement being made, the allocated Social Worker has to prepare a report which is signed off by the Divisional Director. The report has to evidence the steps taken to identify other registered provision and the reason why these approaches have been rejected. The report also has to set out how the proposal placement sits with and supports the existing plan for the young person.

In addition to these measures the Divisional Director also reviews all Un-regulated placements within the Performance Surgeries for IRO's and for the CLA Service every six weeks.

The Corporate Safeguarding Board will also be receiving an update report on unregulated placements at its next meeting in February 2020.

Children Placed at Distance

Another aspect of potential concern in relation to unregulated placements is that for many young people, the unregulated placement is often some considerable distance from the placing Local Authority or from their family and friends.

Of the 3 current unregulated placements that Tower Hamlets has, 1 is within the borough and located firmly within the community that the young person grew up in.

A further placement is in Aylesbury (a distance of 62 miles) whilst the other unregulated placement is placed in Ilford (a distance of 8.5 miles). LBTH insists that, as previously highlighted all young people in un-regulated placements are visited a minimum is 1 x every week.

The broader picture in relation to young people placed outside of the Borough is as follows;

As at 17th December 2019 311 children were looked after by the council. Of these 67 (22%) children were placed in the borough. Of these 37 (55%) were "in house" foster placements.

As of 17th December 2019 244 (79%) children were placed outside the borough. Of these 58 (24%) of these were "in house" foster placements.

As at 17th December 2019 the total number of "in house" foster placements available was 117. Of these 95 (81%) had children in placement and 22 (19%) available placements were vacant.

As the Borough has one of the highest density housing both within London and the UK as a whole, there are very few households that have the spare bedroom which is required for approval as a registered Foster carer. In addition, the Borough is relatively small in geographical terms. Both of these factors contribute to the figure highlighted above which confirms that nearly 80% of young people are placed outside the Borough. However, a similar figure (82%) of our young people are placed within 20 miles of the Town Hall. This indicates that the recruitment of carers and planning for our young people seeks to keep them as close to their families and schools as possible.

It is also important to note that of those children who are placed more than 20 miles away, this will include young people who for reasons of either disability, or other complex needs are placed in very specialist and specific placements that will have been identified to address a very specific need or matched for a very particular type of treatment. This figure will also include a number of young people in Youth Offending Institutions.