

## Ensuring safeguarding and oversight of unregulated provisions for Children in Care

### Background and context

In recent years, we have witnessed a significant shift in the landscape of children's services, with both the sufficiency of appropriate placements and the complexity of the needs of children in care becoming increasingly prominent factors in our planning for children. As a consequence of these factors a small number of our children in care Warrington have been placed in unregulated provisions. Given this it is imperative that we take a proactive approach to address the gaps that comes with unregulated provision and ensure that we do all we can to prioritise the placement of children in regulated provisions, where their safety, well-being, and development can be more effectively monitored and ensured. This paper outlines our approach to overseeing unregulated provisions while emphasising the importance of regulated placements in light of the sufficiency challenges and increased needs' complexity.

### The concerns surrounding unregulated provisions

**Lack of Regulatory Oversight:** Unregulated provisions operate without the stringent regulatory framework that governs regulated children's homes. This absence of oversight can lead to variations in the quality of care and safeguarding standards.

**Inadequate Safeguarding:** Unregulated provisions may lack the necessary safeguarding measures and policies that are standard in regulated placements. This can put vulnerable children at risk of neglect, abuse, or exploitation.

**Stability and Consistency:** Children placed in unregulated provisions may experience frequent disruptions in their living arrangements, leading to instability and inconsistency in their care. This instability can have adverse effects on their emotional and psychological well-being, especially when their needs are complex.

**Educational and Developmental Outcomes:** Unregulated placements often do not provide the same level of educational and developmental support as regulated placements. This can hinder a child's academic progress and overall development, which is of particular concern when children have increasingly complex needs.

### The role of IRO in unregulated provisions

To ensure regular and comprehensive oversight of unregulated provisions, Independent Reviewing Officers (IROs) will conduct case reviews at least every six weeks. These reviews are essential for assessing the child's progress, well-being, and safety in the setting. In addition, to the usual attendees at case reviews, for children placed in unregulated provisions the review will also have the following in attendance:

- Commissioning Team Representative
- Team Manager
- Service Manager

These multi-agency reviews will provide a platform for discussing the child's individual needs, any concerns or challenges, decisions about their ongoing care and review that all steps are being taken to secure a regulated provision.



### **The role of the social work and commissioning team**

When a child is in an unregulated provision it is crucial that we regularly make attempts to identify a regulated provision at the earliest opportunity. To support this the Commissioning Team will conduct searches at least once per-week. Due to our commitment to ensuring our children are in regulated provisions these searches will go nationwide in order to increase the chances of us being able to secure a regulated provision. The Commissioning Team and social worker will liaise closely and swiftly with any potential providers and to gather essential information about these provisions to try and secure a placement as swiftly as possible. The Commissioning Team will also talk to all providers with known vacancies or newly opening homes on a daily basis to prioritise children in unregulated provision.

Whilst a child is placed in an unregulated provision the commissioning team will carry out regular review meetings with the care agencies and conduct quality assurance due diligence on the staffing, policies, procedures. In addition, the allocated social worker will conduct weekly visits to the child and the Systemic Hub Team Manager will ensure be provided with a list of all children in unregulated provision and will that the team link in with the social worker additional support and space for reflection.

### **Regular Updates to the Director of Children's Services**

In recognition of the critical nature of this oversight, updates on the status of unregulated provisions will be provided to the Director of Children's Services and Heads of Service in twice-weekly meetings. These updates will include information on any newly identified provisions, any concerns or issues raised, and actions taken to address them. This real-time communication ensures that senior leadership remains informed and can support swift decision-making when needed, particularly in response to the sufficiency and complexity challenges we face.

### **Conclusion**

In acknowledgment of the current challenges within our system, we understand that, on occasion, a small number of children may find themselves in unregulated provisions. Nevertheless, as a Local Authority, we remain steadfast in our commitment to ensuring the safety and well-being of these children during these exceptional circumstances. Our approach is marked by its comprehensiveness and proactive nature, characterised by increased oversight and scrutiny through regular care reviews, nationwide searches for regulated provisions, and continuous communication with Senior leaders. Our primary goal is to promote the placement of children in regulated provisions.

Date: October 2023

