

Written evidence submitted by the YMCA England & Wales

YMCA England & Wales Children's Homes Inquiry Response Education Select Committee March 2021

Overview

YMCA England & Wales welcomes the opportunity to submit written evidence to the Education Select Committees inquiry on Children's Homes. YMCA is the largest provider of safe, supported accommodation for young people in England and Wales. We offer more than 9,100 beds, which includes everything from emergency accommodation through to supported longer-term housing and youth hostels. YMCA provides supported accommodation for young people generally aged 16-25. Young people situated in YMCA supported accommodation also have access to a wide range of services, including youth workers, councillors, and support services.

As a service that supports young people who have often been through the care and unregulated provision system, YMCA is in a unique position to be able to offer professional advice based on our best practice, and the testimonies of care leavers. In June 2020, The Department For Education consulted on proposals to ban unregulated provision for under 16s, and how regulation of the sector could best be implemented to ensure young people receive the support that they need, feel safe and secure, and to ensure that a high standard of provision is ensured throughout the sector.

The Department for Education has now concluded its consultation on unregulated provision, and YMCA is pleased with the position adopted by the Government. YMCA was pleased to be invited by the Department for Education to facilitate sessions with young people with experience of unregulated provision, and would welcome the opportunity to give further evidence to the Committee if this would be of interest.

In summary, YMCA believes:

- The Department for Education is right to ban unregulated provision for under 16s to ensure that every young person has the best quality accommodation which maintains high standards. YMCA is pleased that the Department has reconciled to do this.
- The Department for Education, and Education Select Committee must consider the impact of these changes in potentially reducing the amount of provision in local areas and ensure that the Government proactively looks to increase the provision of good quality regulated providers that ensure young people can stay within an appropriate distance to their home and where they grew up.
- The Department for Education was right to look at standards in its consultation, but the Department and the Education Select Committee must take into consideration existing standards providers already need to meet and compliment those rather than duplicate. OFSTED rating systems proposed by the Department need to be considered carefully, we must not get to a place where good providers do not want to take on more difficult to handle young people so as to not risk their rating.

- The Department of Education is right not to adopt a rigid definition of care. Young people need different levels of support at different points and times in their lives. A rigid definition of “care” could preclude YMCA’s from offering some of the support services that young people at YMCA benefit from such as mental health support.

Educational outcomes for children and young people in children’s homes, including attainment and progression to education, employment and training destinations

- 1) YMCA England & Wales believes that high quality provision should be inbuilt with progression and educational attainment in order to best support young people placed in the provision. However, consideration should be allowed to best understand the “distance travelled” of the young person entering the provision, rather than purely attainment.
- 2) YMCA England & Wales recommended to the Department for Education that measuring the quality of provision should also be assessed by measuring outcome and the growth of young people, as this will ensure that provision is both meeting the needs of the young person in the placement, and that the interventions and support being provided are additionally having the desired effect.
- 3) To measure educational outcomes, YMCA England & Wales recommends the Education select Committee consider distance travelled, differentiation, and flexibility as part of measuring outcomes for the young person, as well as what tools are being used by the provider, as well as what facilities they have available to deliver this. For example, access to psychologists, music therapy and measuring progress through professional and recognised tools.
- 4) With regards to professional and recognised tools used to measure progress, YMCA England & Wales recommends that “Outcome Star” as a strong method to measure development and progress of a vulnerable young person.
- 5) YMCA England & Wales believes that this measurement should be obtained by visits from IRO’s to providers in order to track progress of young people and show delivery against the objectives of supported accommodation.

The quality of, and access to, support for children and young people in children’s homes, including support for those with special education needs, and the support available at transition points

- 6) YMCA seeks to provide dedicated support to young people placed in our provision. This can include, mental health support, educational support, and skill building opportunities. The ethos of the supported accommodation offered by YMCA is to prepare a young person so that they are ready to move on from supported

accommodation, either into social housing or private rental sector, and live independently. Preparing young people for these key moments of moving on can require different levels of support depending on the needs that the young person has that are identified when they present to services.

- 7) England & Wales notes that Ofsted currently holds a definition of care relating to provision in children's home settings, that distinguishes between children's homes and supported accommodation.
- 8) At present, Local YMCA's that provide services such as children's homes and educational settings are already compliant with this Ofsted regulation. However local YMCA's that at present do not provide these services are not automatically aware if they are in compliance with it as it is not related to their service provision.
- 9) YMCA England & Wales believes that the current flexibility for provision that sits outside of children's homes, such as supported accommodation is beneficial for our provision to meet the needs of the young people placed in it. Providing the correct, tailored support to meet the complex needs of the young person, YMCA believes, is necessary in order to deliver positive outcomes for the young person placed in the service. For example, factors such as individual control of finances, freedom to leave at will, or that the individual is unsupervised are variables that need to be considered when providing the correct level of support for an individual placed in a provision, and for the sector to be able to correctly support young people, YMCA believes that these should be available options for individuals that sit outside of Children's Home settings. For example, particularly relating to mental health services, local YMCA's reflected that in some circumstances it is necessary for either a social worker or the individual's community contact to attend or take the young person to the service, or in instances relating to self-harm, a young person may require greater levels of supervision. This is rightfully considered the correct course of action to prioritise the well being and safety of the young person in question.

The use and appropriateness of unregulated provision

- 10) YMCA England & Wales does not believe that there would be any direct negative impact of banning unregulated accommodation for under 16s as reconciled to do so by the Government. It is our position that ensuring the standard of support and care for young people under 16 should be the primary motivator in any decision made by the Department, and therefore banning unregulated provision for under 16s would be desirable, as under 16s require a higher standard of care and support than is provided by unregulated provision. Young people that we spoke to also reflected that they felt sometimes they were moved into unregulated provision after turning 16 too early, as they were not ready.
- 11) YMCA is a federated charity, composed of over 100 local YMCAs, that provide tailored and specialised services to the communities that they serve. We provide

supported accommodation for vulnerable young people, with a focus as a “moving on” provision. This supported accommodation includes wrap-around support, often including on-site professional services, such as psychologists and mentors. Our submission to this inquiry and the Government’s consultation is based on detailed consultations with YMCAs that provide this service and have an excellent, technical understanding of the sector and are service providers. The vast majority of local YMCA’s that engaged on this subject reflected that they would as a rule, not take under 16s, our services currently focus on the 16 - 25 age range and supporting them from homelessness or unstable homes into independence. Where we do provide for under 16s this is as a regulated care home.

- 12) YMCA England & Wales understood the concerns raised by the Department in its consultation that banning unregulated provision for under 16s could mean a surplus of unhoused young people if other suitable facilities were not found. The YMCA federation strongly suggested that they are well placed as respected providers to provide a regulated care service to support these vulnerable young people at a significantly better standard of quality and affordable price than current unregulated provision. However, this could only be made possible with changes to the guidelines for how to set up regulated services.
- 13) Through our conversations with local YMCA’s, YMCA England & Wales notes that Local Authorities have become anecdotally “fed up” with placing young people in private equity owned provision, and have in many instances, started to come to their local YMCA as a first port of call due to the excellent reputation that YMCA provision has, and where trust has been shaken in the ability of some providers to provide the necessary and correct standard of support for vulnerable young people. YMCAs across the country were able to share examples of bad providers who were not fit for purpose, due to facilities not meeting the requirements for the young people placed there and repeatedly returning young people to the Local Authority.
- 14) YMCA England & Wales also notes that unregulated provision regularly fails to meet the standards necessary for young people, either due to poor capacity, sub-par facilities, or general unwillingness, and this has meant that often young people are at risk. This is not only a failure of the duty of care, but is also an incredibly hurtful and damaging experience for a vulnerable young person and YMCA England & Wales considers this unacceptable at every level, and a dereliction of duty. In situations where this has happened, YMCA’s, also noted that in some instances, they had been approached by Local Authorities asking them to provide temporary accommodation, in the form of “emergency crash pads”, with support from Local Authority social workers, rather than the young person have to spend the evening in police custody. As a trusted provider in the local community, YMCA’s have been stepping in to provide an emergency service following the failure of other providers to meet their duty of care and support for the young person.
- 15) If guidance on regulated provision is changed YMCA is confident that local YMCAs would be able to provide a better quality of service with the interest of young people at the heart.

16) A local YMCA reflected that often young people placed in these unregulated provisions are rapidly relocated, or in some instances, just returned to the local authority as the provider does not have the ability or willingness to meet their needs. Young people have shared with us stories where due to their mental health, the care that they were placed in was not able to meet their needs and so they were relocated. This leads to an increase in emergency placements, which sustains the issues that the Department has identified in emergency placements not going through the same checks as regular placements, often leading to a vulnerable young person being placed in unsuitable provision repeatedly.

Criminalisation of children in children's homes

17) In YMCA England & Wales submission to the Department For Education's consultation, YMCA agreed with the Department that a new requirement should be introduced for local authorities to consult with relevant local police forces when placing a child out of area in independent and/or semi independent provision. The Department for Education has not chosen to continue with this proposal.

18) YMCA England & Wales believes that supporting vulnerable young people requires an integrated approach, particularly regarding safeguarding and protecting vulnerable young people from situations where they may be exploited. YMCA England & Wales stresses the importance that this process did not become overly formalised as it could become a tickbox exercise that did not adequately provide the oversight and support necessary to achieve the objectives of the Department.

19) However, YMCA England & Wales advocates that an integrated approach, including regular liaison with the police to be built into all service provision as standard, and that providers that do not meet this level of support and integration are negligent and not fit to provide support for vulnerable young people. YMCA's work closely with local police forces in order to better understand the individuals in their accommodation, and ensure that correct provision and support is made for them.

20) Some local YMCA's have regular weekly contact as standard with local police forces in order to ensure that they are placing young people in places where they can be supported. YMCA believes that it is important that service providers and Local Authorities are able to understand all the context relating to a prospective placement, in order to ensure safeguarding standards are met within the accommodation. As an illustrative example, some YMCA's have internal standards that limit the number of young people with drug addiction placed in any one provision when it is not purpose-built to provide for individuals with these needs, so as to ensure that the provision remains stable and an environment is not created where there is a saturation of drug usage without proper controls in place to mitigate this. Allowing proper communication between Local Authorities, Police, and Providers would ensure that placements can ensure that young people are not being placed in potentially unsuitable environments. For example, it would be necessary to know if a service

took sex offenders from a key safeguarding perspective before placing other vulnerable people in that service.

- 21) YMCA therefore believes that anything that the Department can do to ensure that this information is effectively and clearly communicated between police forces, local authorities, and providers is desirable, and thusly supported the introduction of this new duty, with the caveat that this should be introduced as an integrated and wrap around approach, not just as a basic check. YMCA England and Wales recognises that the Department considers that this dialogue already happens between local authorities, service providers, and police forces, but welcomed the proposal to formalise this as a statutory obligation.

The sufficiency of places in children's homes, and the regional location of homes

- 22) Young people told us that before arriving at a YMCA and being in the care system often due to lack of supply of appropriate places they were often placed very far away from their homes and where they grew up. In some instances young people were placed 4 hours away. YMCA would encourage the Committee to review the impact of potential reduced provision and explore proactive ways in which the Department can increase the number of good quality placements for children and young people in their local area.
- 23) YMCA England & Wales recognises that mandatory quality marks and standards as advocated for in our submission to the Department in order to be an eligible candidate to tender for service provision could present challenges regarding the closure of unfit provision. However, YMCA England & Wales believes that ensuring high quality provision across the board must be the number one objective for DFE when considering new regulations.
- 24) Furthermore, in an instance where provisions that were only meeting basic requirements or failing to provide the necessary service were required to close, if supported by Local Authorities, YMCA England & Wales is confident that local YMCAs would be able to provide a better quality of service.
- 25) YMCA England & Wales also notes an appetite in local YMCAs to further develop children's home provision to meet demands in the sector to the consistent high standard that is expected from our other services, if supported by Local Authorities. YMCA England & Wales notes that if supply of children's home services was to reduce following the proposals made by the Department in this consultation, YMCA's, if correctly supported, would be able to scale up and open new supply of provision to meet the demand. YMCA England & Wales recommended that the Department for Education reviews the current process by which a Children's Home can be opened and modifies it to be in line with the current process for free schools. This method would not require upfront capital outlay and would remove the majority of the serious barriers faced by charities like YMCA when working to open this form of provision.

The impact of the Covid-19 pandemic, including the extent to which this might increase the demand for places in children's homes

- 26) YMCA is aware that the COVID-19 pandemic and subsequent lockdown may have increased levels of family strain. This issue could exacerbate the number of young people who present to homeless services in the event of breakdown. In situations where the individual is over 16, they could typically be placed in supported accommodation provision like YMCA. 58% of young people that YMCA England & Wales spoke to regarding the impacts of lockdown said that the relationship with their family had become more strained as a result.
- 27) YMCA believes that family breakdown is one of the leading causes of youth homelessness, and, during the pandemic, YMCA's have reported increased numbers of young people presenting as homeless. For example, in the South East, there has been a 61% increase in the number of young people presenting as homeless from the year before. While this may be in part due to the "Everyone In" scheme, that likely would have caused young people not visibly homeless, due to sofa surfing, for example to come forwards, family strain and breakdown reported may also be a contributing factor.
- 28) Many YMCAs provide family mediation services as a method to reconcile families and reduce youth homelessness, and anecdotally, demand for this service has almost doubled over the last year, suggesting that the need to seek support from family services as a result of lockdown is an extremely present reality.
- 29) YMCA also reflects that anecdotally safeguarding referrals have increased over the last year. When speaking to youth workers about the impacts of the pandemic, they reflected that often they had witnessed concerning things while running virtual sessions with young people that had prompted them to make a referral. Some YMCAs report there has been a 45% increase in safeguarding alerts, with a significant increase in the number of young people presenting with neglect, physical, and emotional abuse issues.
- 30) The factors highlighted in paragraphs 30-33, YMCA believes, could readily present contributing factors that will increase demand for places in provision for young people.

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