London Borough of Haringey

Looked After Children
Placement Sufficiency Strategy
2013/14 – 2016/17

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Document Control

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Approvals

The signatories below have fully reviewed, and approved, this LAC Sufficiency Strategy.

Name	Role	Signature	Date	Version
Lisa Redfern	Director			

Version History

Version	Date	Author(s)	Summary of Changes
V0.1	10/12/13	EW	
V0.2	16/12/13	CP/EW/AT	Revisions throughout, including to analysis
V0.3	06/01/14	CP/EW/AT	Additions to: - Section 2 (Executive Summary) - Section 5 (Introduction) - Section 11 (Action Plan) Corrections to Section 1 (Contents)

1. Contents

2. Executive summary

This document is Haringey's Placement Sufficiency Strategy.

It sets out how the Council and its partners will help looked after children to achieve successful outcomes through the provision of appropriate care and accommodation, and how available resources will be best used to do so.

The Placement Sufficiency Strategy comprises an important part of Haringey's LAC Strategy, but is only one element in the wider partnership response to the needs of children, young people and families. Education, Health, Housing, Social Work and other partners all play an important part both in the delivery of placement sufficiency and in enabling every child and young person to thrive and achieve their potential.

This paper starts by reviewing who Haringey currently looks after – the profile and characteristics of children in care – and how those children are accommodated. Throughout this review it identifies gaps and opportunities for continued improvement. It ends by defining the actions the Council and its partners are taking and will take to ensure sustainable placement sufficiency in the future.

In summary, recent years have followed a positive trajectory in respect of LAC numbers, placement mix and total cost, and analysis points to scope for further improvements. To provide sufficiency within anticipated budgets, many or all of these improvements must be made at pace.

Since the peak of 638 in May 2011, there has been a strong and consistent reduction in the number of children in care, to 508 in November 2013.

The Borough has also seen some success in the way that children have been accommodated in that a greater proportion of children are now within family or semi-independent placements rather than residential units. As a result of this and other positive factors, fewer placements are now breaking down.

The costs of the main types of placement have remained relatively steady in recent years, and total placements costs have reduced too, in line with the reduction in looked after children and with the more favourable mix of placement types.

What the analysis in this strategy shows is that more can now be done: to reduce the number of children coming into care and increase those returning home; to accommodate looked after children closer to their family homes; and to manage unit costs. All of these opportunities also provide prospects for better use of available resources.

Firstly, despite the decrease in recent years, the level of looked after children is still higher than that of comparator authorities.

Secondly, despite the move away from residential placements, a high proportion of family placements are with independent providers (60%). Haringey values and encourages the role of the market in providing placement choice, however the current level of reliance on independent provision is one of the highest in the country.

Thirdly, independent provision is not currently commissioned in a way which allows providers or the Council to get the best from the relationship.

This analysis and action plan centres on these 3 key themes, on how the Borough can:

1. Enable further reductions in LAC numbers by supporting positive exits from care;
2. Allow LAC to be accommodated more locally by the development of greater in-house family placement capability and capacity, and
3. Achieve better use of resources by working with the market to proactively shape provision which better meets the needs of Haringey's LAC and enables providers to invest and innovate.

Broadly, this plan involves:

1. Implementing or re-deploying placement supports and expertise further 'upstream' to prevent escalation of need and investment in more effective placement support to enable more children to return home more quickly;

2. A carer-centred transformation and expansion of the in-house fostering service. This includes the testing and development of new service delivery models, investment in supervision quality, carer-led design and delivery of new service initiatives, and the development of a 'specialist' fostering service offer, and

3. The review and rationalisation and framework arrangements and brokerage processes and active development of more mature provider partnerships.

Section 11 sets out the detailed actions and Section 10 the financial context underpinning this strategy. It is clear that these actions must be taken without delay in order to provide greater and sustainable sufficiency. The Council has put in place ambitious plans and processes to ensure they are taken forward and will keep this strategy under close review.

This strategy is set within the context of Haringey's existing placement policies and the analysis and action plan are aligned to those policies and aim to better enable or accelerate delivery of them. The strategy will provide the reference point for commissioning decisions and activity over the next 3 years and as such will be

reviewed, refreshed and approved annually to ensure that momentum and consistency is maintained, that the Borough can remain agile and responsive to innovation and that progress is monitored at a strategic level.

3. Context

"We want all of Haringey's children to have the best start in life so that they can lead successful and prosperous lives in adulthood."

Councillor Claire Kober, Leader, Haringey Council
Haringey's Corporate Plan: One Borough, One Future, 2013/14 – 2014/15

Haringey's vision for *One Borough, One Future,* is set out in the Corporate Plan 2013/14 – 2014/15. Within it are a number of strategic principles, outcomes and priorities. These include:

Principles

1. Investing in prevention and early help – improving the life chances of residents and reducing costs, and

2. Promoting equality – tackling the barriers facing the most disadvantaged, enabling them to achieve their potential.

Outcomes	Priorities
Outstanding for all: Enabling all Haringey children to thrive	Enable every child and young person to thrive and achieve their potential
Safety and wellbeing for all: A place where everyone feels safe and has a good quality of life	Safeguard adults and children from abuse and neglect wherever possible, and deal with it appropriately and effectively if it does occur
A better council: Delivering responsive, high quality services and encouraging residents who are able to help themselves to do so	Strive for excellent value for money

Delivery of the Corporate Outcomes is supported by four corporate programmes, including Haringey 54,000 ('H54k'). H54k is:

A programme to deliver our vision of 'Haringey being a place where children and young people are known to thrive and achieve'. It seeks to achieve sustainable improvement in outcomes for children, young people and families with a particular focus on:

- *ensuring all families can access a high quality educational offer in the borough*
- *promoting resilient families, by acting as a catalyst for a wide selection of high quality universal or targeted borough-based child and family activities, and*
- *providing high quality safeguarding to those who need it.*

In addition, Haringey's Children's Trust outlines how the Corporate Priorities and other partnership objectives will be delivered through the Children and Young People's Plan 2013 – 2016 (the 'CYP Plan'). The CYP Plan aligns with the vision in the Corporate Plan and identifies 5 outcomes and 4 key principles:

Outcomes

1. Quality services
2. Every child has a healthy start in life
3. Thriving families
4. Raised educational attainment
5. Children and young people are safer from the risk of harm

Principles

1. Promoting prevention, early help and intervention
2. Reducing inequality
3. Developing resilience and community participation
4. Ensuring best use of available resources

This combined vision sets the ambition and strategic framework for delivering improved outcomes for the children and young people of Haringey. Both the Corporate Plan and CYP Plan recognise that they are set against a backdrop of reduced and reducing public sector funding settlements and that is why, more than ever, partners across the Borough must work together to prevent need from escalating and to reduce demand for more intensive and costly services.

For Haringey, this means releasing capacity from expensive interventions such as social care and specialist services, including placements for children in care, to provide families with earlier help.

This provides the broad context of this strategy to provide the right placements at the right time for children in care; a Borough-wide commitment to helping families earlier, a need for resource shift away from intensive interventions to support the early help effort and continuing financial pressures across the system.

4. Purpose

The purpose of this strategy is to set out the approach of the London Borough of Haringey to achieving placement sufficiency for the looked after children ('LAC') in our care. Through our strategy, our ambition is to meet the needs of the most vulnerable children in Haringey in the short, medium and long term whilst ensuring best use of available resources.

The strategy supports the implementation of the core priorities of the Corporate Plan and the Children and Young People's Plan, recognising the complex context in which we are operating and focusing on enabling all Haringey children to thrive through the provision of quality services which keep them safe from the risk of harm.

The strategy is built on a detailed analysis of LAC trends to inform our commissioning activity and future arrangements for the commissioning of placements. This analysis also forms the basis of the commissioning plan for how Haringey, along with our partners, intends to meet the 'sufficiency duty' as specified in 'Sufficiency – Statutory Guidance on securing sufficient accommodation for looked after children' (2010).

Overall, this document will provide a common understanding and reference point for key stakeholders, including commissioners, partners, service managers, H54K and the wider market to improve outcomes for LAC in accordance with the Corporate and CYP Plans. This includes:

- how we understand the profile of children who come into care;

- how we forecast the future demand for placements;

- how we ensure children and young people are placed appropriately and without delay; and

- how we develop our services and the market to ensure appropriate and sufficient provision in Haringey.

The scope of this document is focussed on the accommodation of looked after children, however it runs parallel with, and is aligned to, Haringey's strategies to mitigate the number and needs of those looked after children and their needs. These strategies include activities in the sphere of early help, children on the edge of care and permanency.

5. Introduction

There are currently 508 looked after children in Haringey (November 2013).

The policies underpinning the Council's approach to the accommodation of children becoming looked after are:

1. Placements and Permanency Policy (published 2013)
2. Family and Friends Policy (published 2013)

These policies state that the Council is strongly committed to supporting families effectively and, wherever possible, to avoiding the need for children to come into the public care system. When children do become looked after the Council will aim to avoid any drift and make appropriate plans based on a sound and ongoing assessment of the needs of the child. The Council will seek to:

- Return children to their birth families as soon as possible, consistent with the child's needs
- Place children with Family and Friends carers wherever possible and where this is in the best interests of the child
- Always place children in family settings other than in exceptional circumstances
- Provide the right level of practical, social work and financial support to foster carers
- Secure legal permanency through Adoption, Special Guardianship or Residence Order wherever possible for children who cannot be safely returned to their birth families
- Place children in or close to the borough where appropriate to help maintain ties with family, friends, school and community

This strategy does not propose to revise these policies but to review how effectively and efficiently current arrangements achieve strategic and policy objectives and to seek out opportunities for further improvement.

It was developed based on the approach below, a structure which the document also follows:

- Historical evidence base - a local analysis of:
  - Placement demand - the levels, needs and characteristics of LAC
  - Placement supply – the method, mix and cost of provision
  - This section identifies improvement opportunities throughout

- Financial context and scenarios – the financial imperative and an illustration of sustainability options

- Sufficiency actions – a strategic plan responding to the opportunities identified

This strategy is a 'live' document is intended to be flexible and agile to changing circumstances. It will be kept under review and amended as appropriate, for instance as new statutory requirements emerge or as innovative new practices emerge.

The announcement in December 2013 of a new legal duty on local authorities to provide financial support for every young person who wants to stay with their foster parents until their 21st birthday, for example, is currently under consideration by the Council. When the local sufficiency and financial implications of this duty are clarified, they will be incorporated into this strategy.

6. Summary of current position

Purpose

➡ To provide a summary of current placement demand and supply.

Findings

➡ Recent years have followed a positive trajectory in respect of LAC numbers, placement mix and cost, and comparator analysis indicates scope for continued improvement

➡ Since the peak of 638 in May 2011, there has been a strong and consistent reduction in overall **LAC numbers**, to 508 in November 2013.

➡ Even following this reduction, however, the Haringey LAC rate (LAC per 10,000 of children and young people) remains higher than that of statistical neighbours and significantly beyond the local 7 year low of 412 children (September 2007), pointing to opportunities for further and sustainable decreases through effective early help, edge of care and return-home activity.

➡ **Placements mix** has improved in recent years too in that a greater proportion of children are now within family placements (use of residential is currently at a 7 year low). Later sections highlight that this appears to have translated into successful outcomes with respect to placement stability.

➡ There remains however a comparatively high level of reliance on independent providers for those family placements and a clear opportunity to both place children closer to home and achieve better use of resources through the growth of the in-house fostering service.

➡ **Unit costs** have remained relatively steady across the mixed economy of provision over recent years and total placements expenditure has broadly reflected the downward trend in LAC and the re-balancing of the placement mix.

➡ Comparative analysis highlights however that costs can be better managed and highlights the case for a greater degree of strategic commissioning and robust contract management.

6.1 LAC population and placement profile

Figure 1: LAC numbers and placement types (March 2006 – November 2013)

Chart legend (top to bottom):
- Absent
- Placed at home
- Residential - other
- Residential - secure
- Residential schools
- Semi-independent
- Residential - external
- Residential - internal
- Placed for adoption
- Foster care - external
- Foster care - internal

Annotations on chart: September 2007 - 411; May 2011 - 638; November 2013 - 508
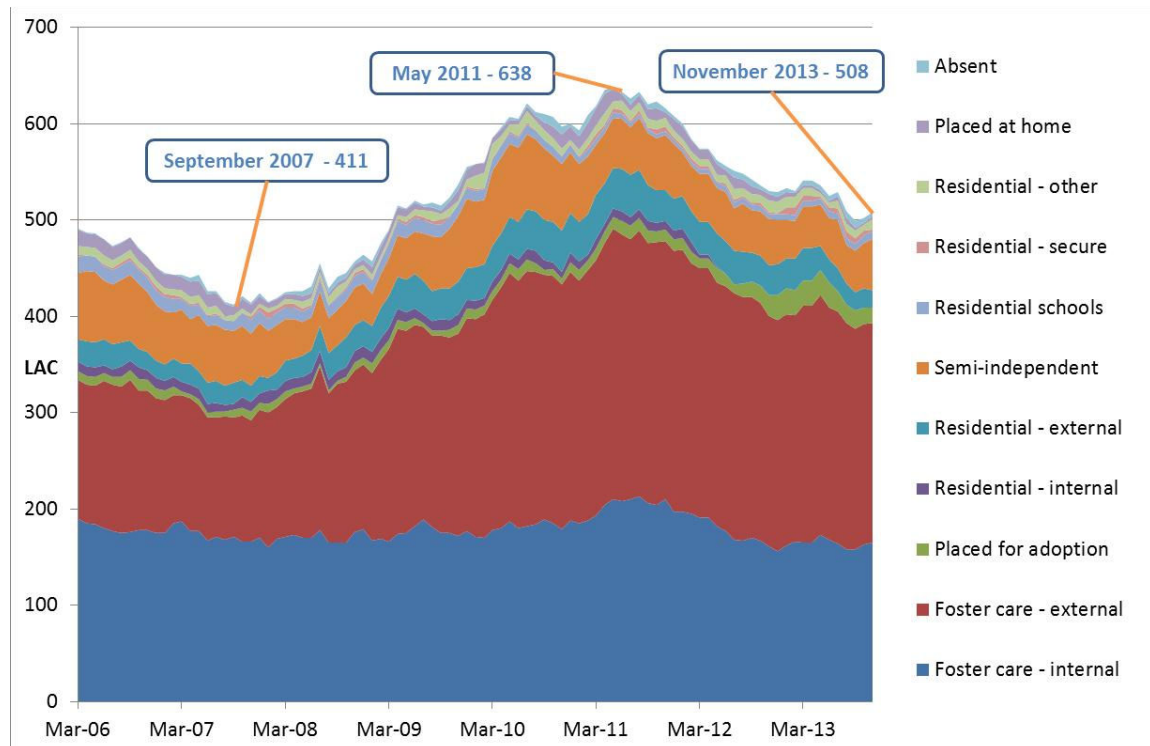
> LAC numbers at September 2013 will need to reduce by a further 7.5% (38) to deliver our aspiration of 470 by March 2015

➡ With the exception of a 4% increase in LAC numbers between September 2010 and April 2011, LAC numbers have seen a steady decrease over recent years.

➡ In the 12 month period ending September 2013, there was an 8% decrease in the LAC population with September 2013 LAC figures reporting 499.

➡ The strength of this trend provides comfort it will continue and current aspirations are of a further reduction to 470 by March 2015, following which the level is expected to stabilise.

Figure 2: Placements mix as at year or period end (2006 to date) - proportion
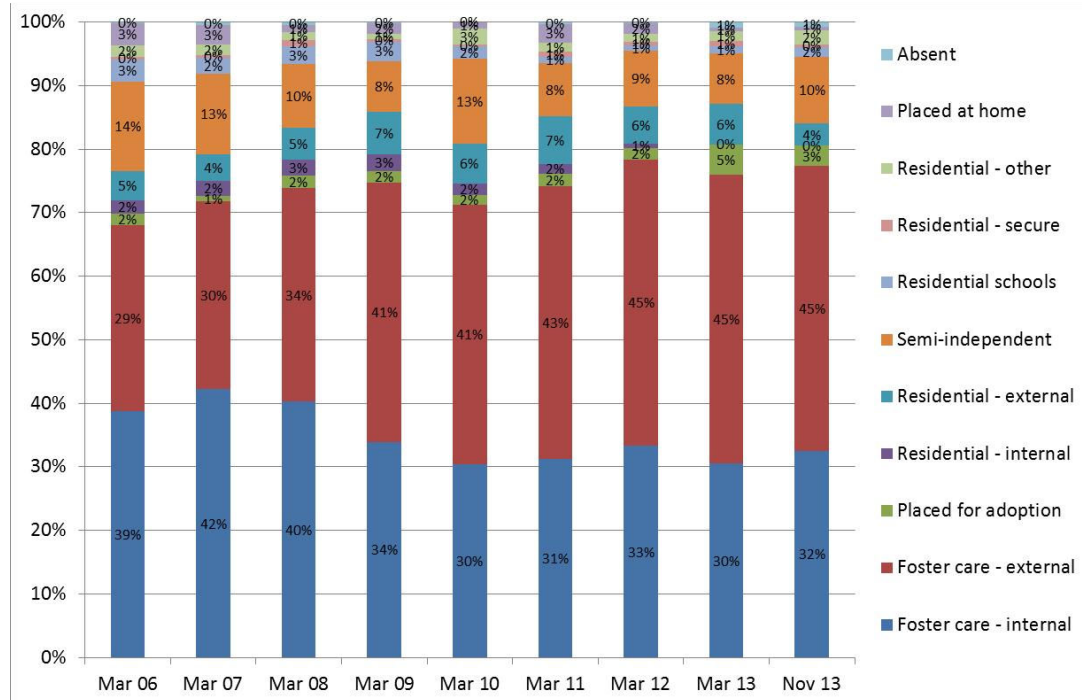
Figure 2: Placements mix as at year or period end (2006 to date) - number
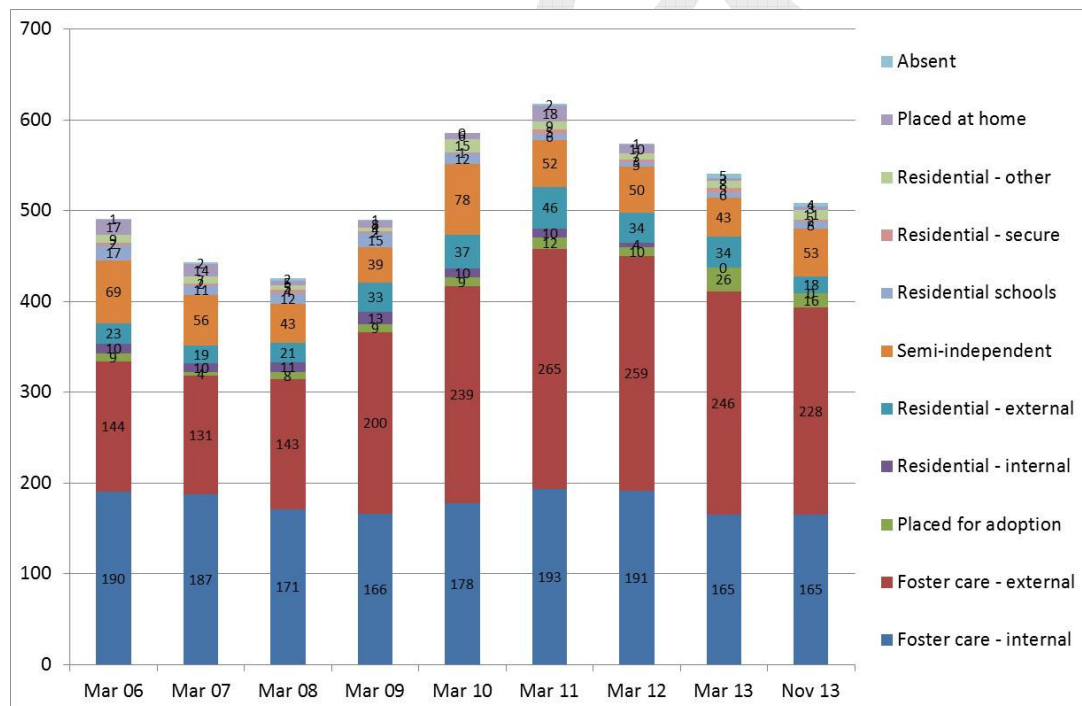
- Semi-independent provision has played an important role in the step down of placements from residential accommodation
- Whilst the in-house fostering service has maintained placement share it has contracted in line with LAC reductions since 2010/11

Figure 4: Placements net expenditure and provisional budget (2009/10 – 2016/17)
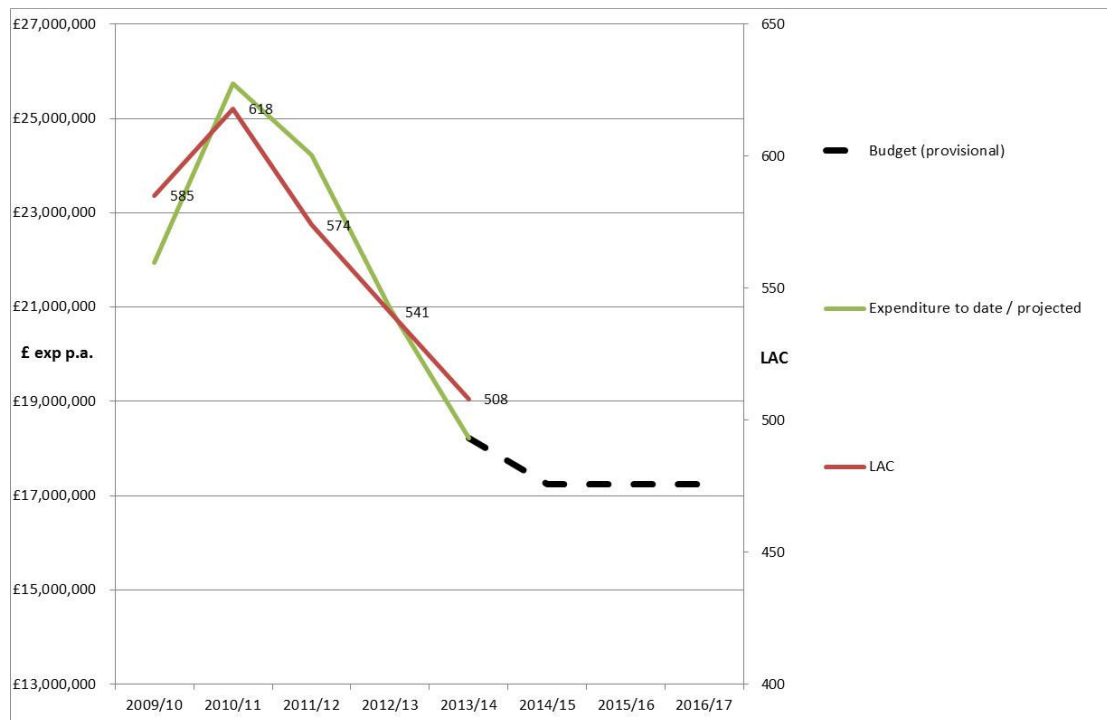
➡ In the past 2 years, overall net spend has decreased at a greater rate than LAC

➡ This reflects the changing blend of placements (less expensive accommodation) and the impact of a number of income items (DSG, remand allocation)

➡ The unit costs of high volume placements have remained broadly steady through this period (see Figure 5 below).

Figure 5: Placement unit costs (2009/10 – 2013/14 as projected)
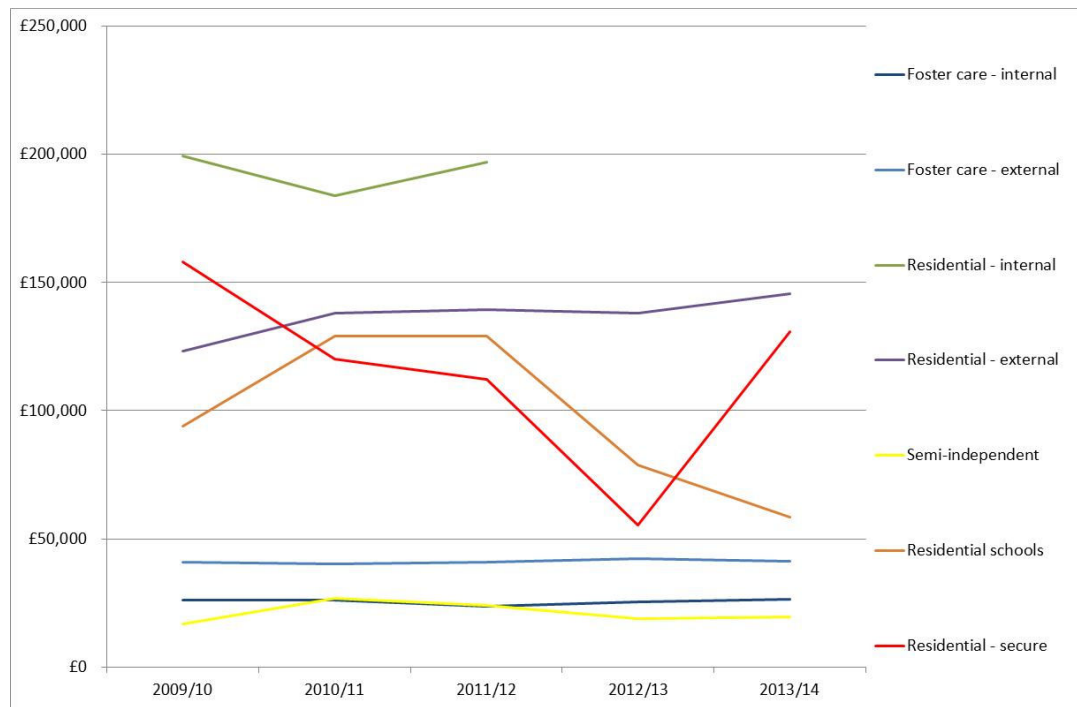
Figure 6: LAC rate, per 10,000 children aged 18 and under
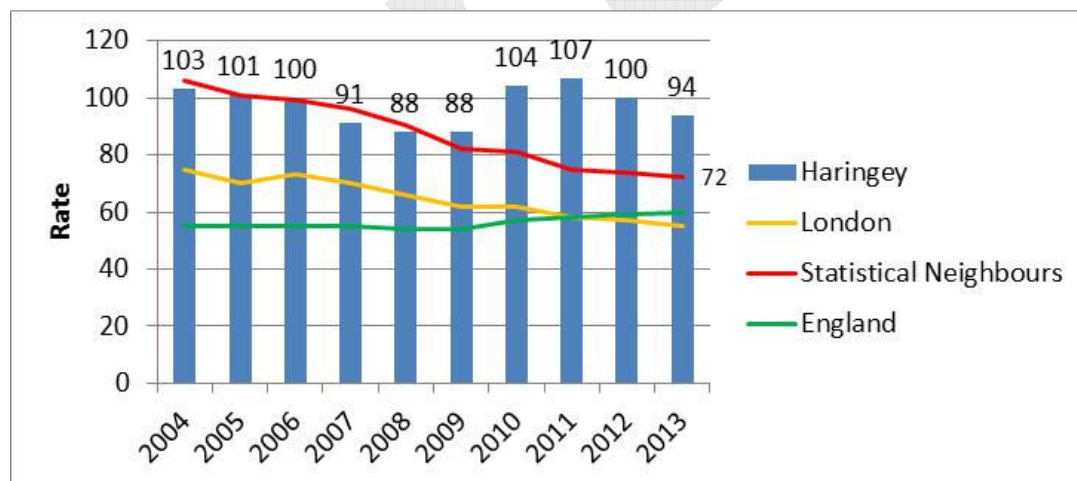
➡ Contrary to the national trend, LAC levels in Haringey have fallen back significantly since 2011

➡ However the local rate of LAC incidence is still 31% higher than that of statistical neighbours (the average thereof)

6.2 Pressures on the LAC population

➡ Haringey's population is growing. It is projected to expand by 6.6% or 14,900 residents by 2029, according to the ONS projections (2004 sub-national population projections) and by 10.6% or 23,800 residents by 2031 according to the GLA projections 2005 estimates.

➡ By 2021, it is anticipated that the Haringey population will be 286,774. This will be made up of 60,664 0 – 17 years old (21.2% against an average in London of 22.6%, and in England of 21.7%).

➡ There are approximately 55,600 children and young people under 20 living in Haringey now. While the population of Haringey as a whole is getting relatively older, the numbers of very young children is also predicted to grow.

➡ Latest available data highlights that the wards in Haringey with the largest number of children aged under 19 are in the east of the borough, particularly Seven Sisters, Northumberland Park, Tottenham Hale and White Hart Lane. The proportion of children under 5 varies between wards, from 5.5% (Highgate with 565 children) to 8.5% (Northumberland Park with 1,069). This has important implications for service provision, as it creates a greater need in the east of the borough.

➡ We are the 13th most deprived borough in the country and the 4th most deprived borough in London (using the average deprivation score). Given additional pressures created by on-going austerity measures and welfare cuts, many of which have only taken effect from the 1st April 2013, prevailing economic factors may increase the likelihood of rising placement demand if our early help and targeted services cannot prevent the escalation of need.

➡ Taken together with the current placement cost trend, these demographic, economic and financial pressures present significant challenges to the delivery of placement sufficiency, and a greater imperative to realise improvement opportunities.

Figure 7: Links to the wider system
Source: Department for Education (Sept 2013)

CP per 10,000 vs. LAC per 10,000
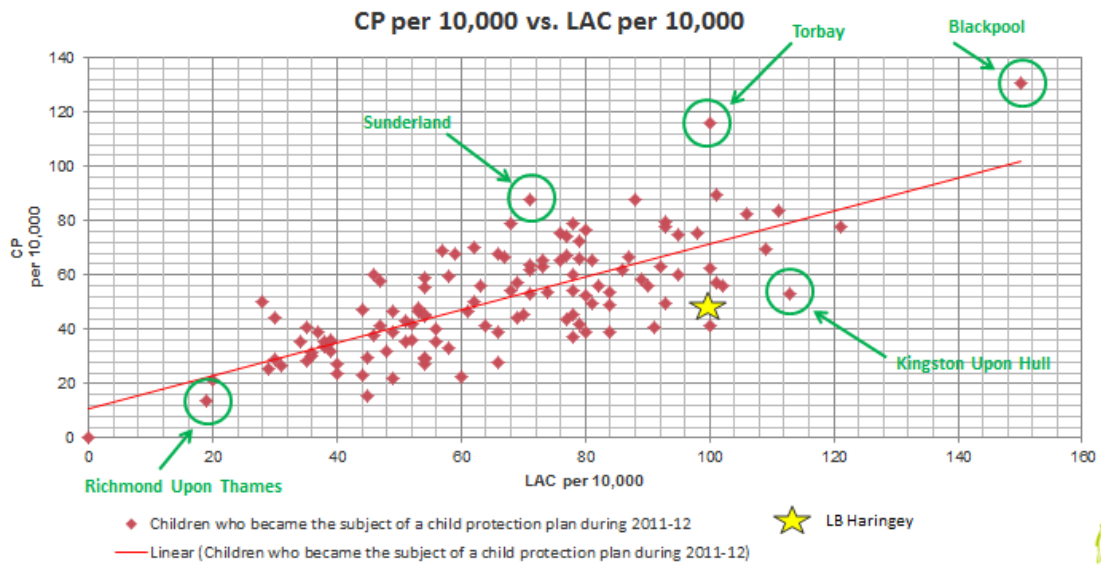
➡ Figure 7 highlights that the correlation between LAC and CPP.

➡ This suggests an imbalance in Haringey's system of help which favours later intervention and provides further evidence as to the scope for further activity across the Borough to enable the provision of help at an earlier stage and ultimately ensure that fewer children come into care.

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7.1 LAC profile

Figure 8: LAC starters & leavers (Sept 12 – Sept 13)
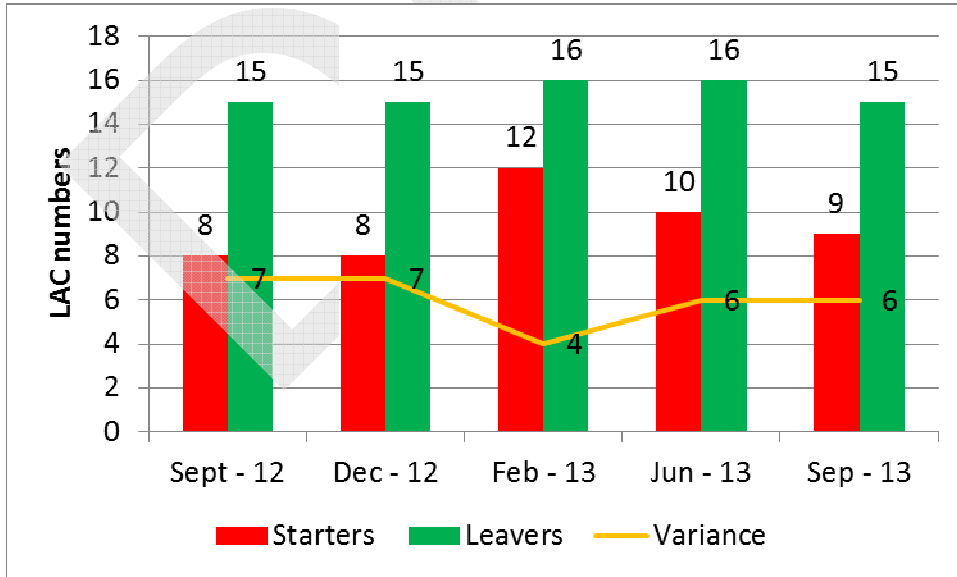
➡ The number of starters and leavers for the period September 2012 – September 2013 has remained fairly stable.

➡ This provides comfort as to the strength of the underlying trend.

Table 1: Reasons for ceasing to be a child in care (September 2012 – September 2013)

Reason	Number	Percentage
Returned home to live with parents, relatives, or other person with parental responsibility (not under a Residence Order or Special Guardianship Order)	29	38%
Period of being looked after ceased for any other reason	24	31%
Adopted - application for an adoption order unopposed	6	8%
Special guardianship made to former foster carers	6	8%
Special guardianship made to carers other than former foster carers	6	8%
Moved into independent living arrangement and no longer looked after: supportive accommodation providing formalised advice/support arrangements (e.g. most hostels, YMCAs, foyers, and care leavers projects)	3	4%
Sentenced to custody	2	3%
Unknown	1	1%
Total	**77**	**100%**

Figure 9: LAC cohort by age (September 2010 – September 2013)
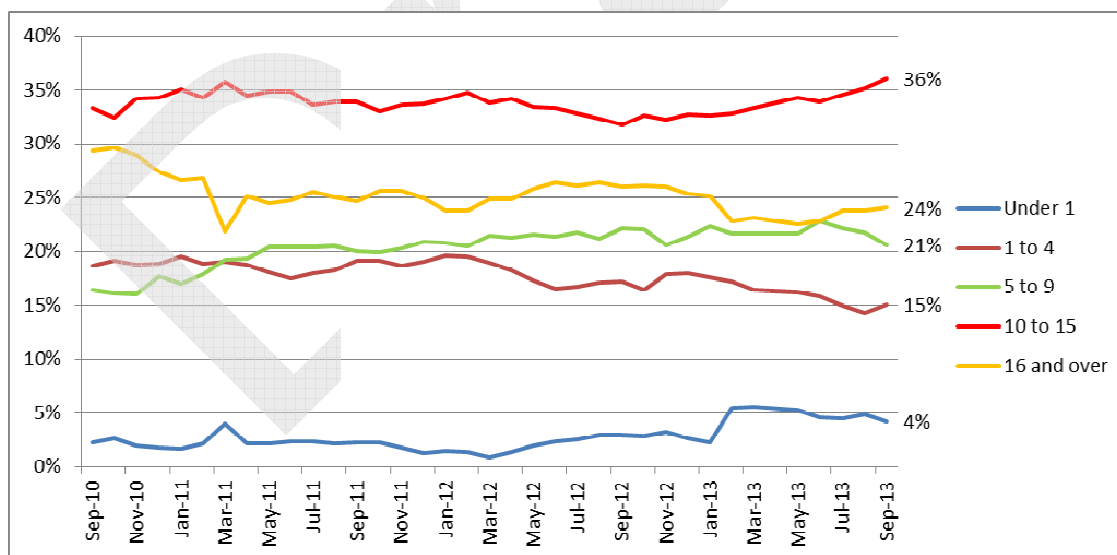
➡ The highest proportion of LAC is in the 10 – 15 year old age bracket, with 36% of the overall cohort in this category.

➡ In addition, we have seen a steady increase in the 10 – 15 year old age cohort since September 2012.

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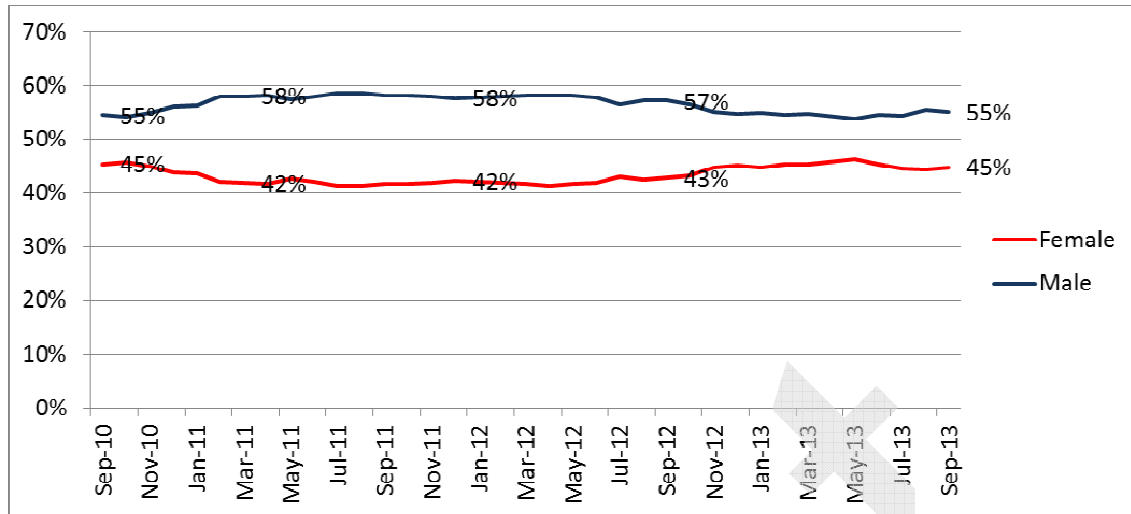**Figure 10: LAC age by placement (September 2013)**

Chart legend:
- Absent - whereabouts unknown
- External fostering (IFA)
- Homes and hostels
- In-house fostering
- Kinship foster care
- Placed for adoption
- Placed for adoption with former foster carer
- Placed with own parents/guardian
- Residential care
- Residential school
- Secure accomodation
- Semi-independent
- Whereabouts known (not refuge)
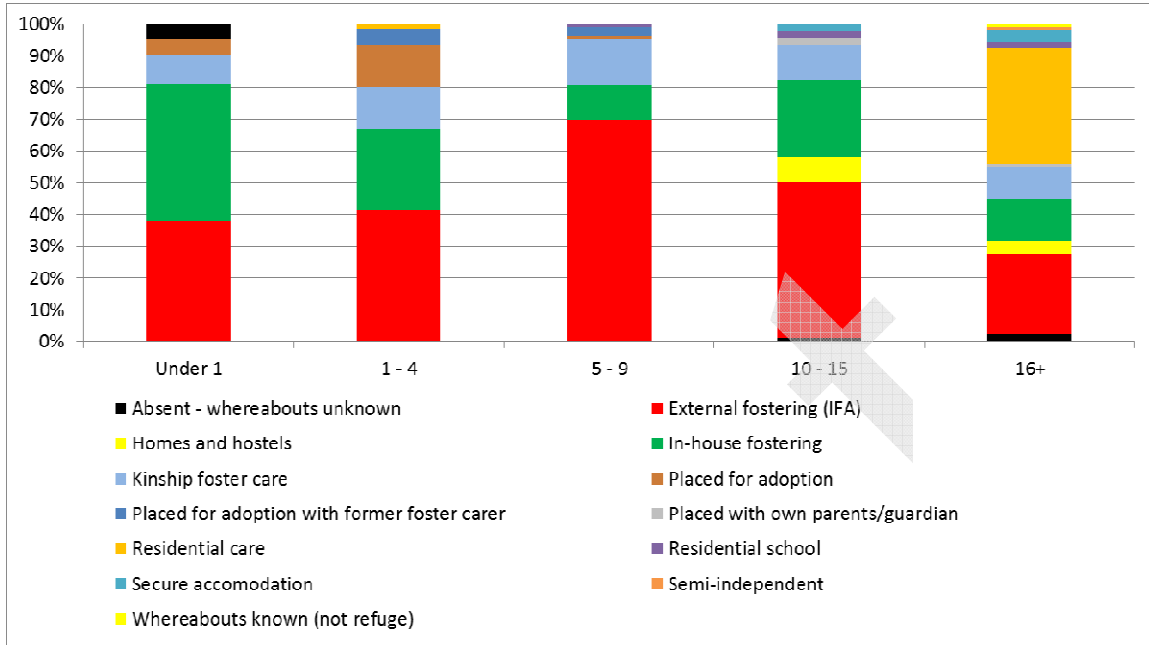
➡ As at September 2013, for all age cohorts other than babies and over 16s, IFA represented the most common placement type. This was particularly pronounced in the 5 – 9 age group where 65% of children were placed with IFAs.

➡ In the 16+ age cohort, 36% of LAC were placed in residential accommodation. This highlights the importance of developing early pathway plans to ensure alternatives to care are explored and considered where appropriate.

➡ The 10 – 15 and 16 years plus are generally considered harder to place and the placement mix of these groups magnifies a vital issue with support services to foster families

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Figure 11: LAC cohort by gender (September 2010 – September 2013)

➡ The male/female ratio of LAC has remained stable over recent years with a slightly higher proportion of males (55%) across both agency and in-house placements.

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Figure 12: LAC cohort by ethnicity (September 2010 – September 2013)
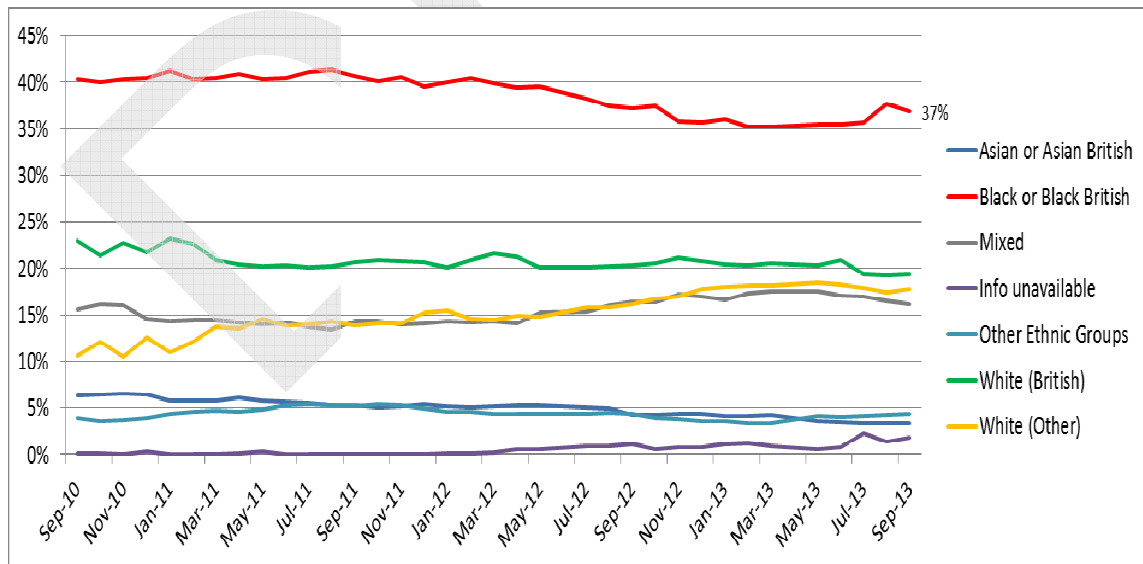
➡ The most common LAC ethnicity is 'Black or Black British' (37%).

➡ 'White British' represent the second largest cohort (19%).

➡ There is a relatively small proportion of 'Asian or Asian British' LAC.

➡ The proportion of 'White (Other)' has almost doubled over the past 3 years.

Figure 13: LAC family and care addresses (highest 5 boroughs, September 2013)
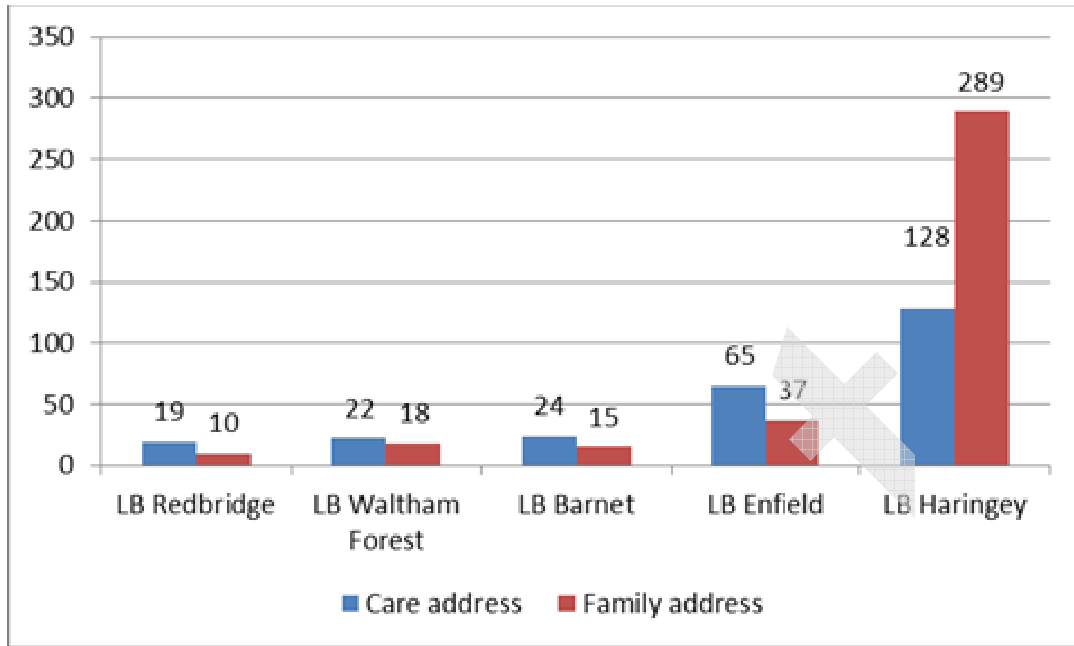
- In September 2013, LAC family addresses reached across 56 districts whilst LAC were placed across 87 districts.

- Only around half of the LAC family addresses are in Haringey, the remainder being outwith the Borough.

- The data also highlights the geographical mismatch between placement and LAC family location and specifically the lack of local carers.

Figure 14: Haringey LAC family current address (September 2013)
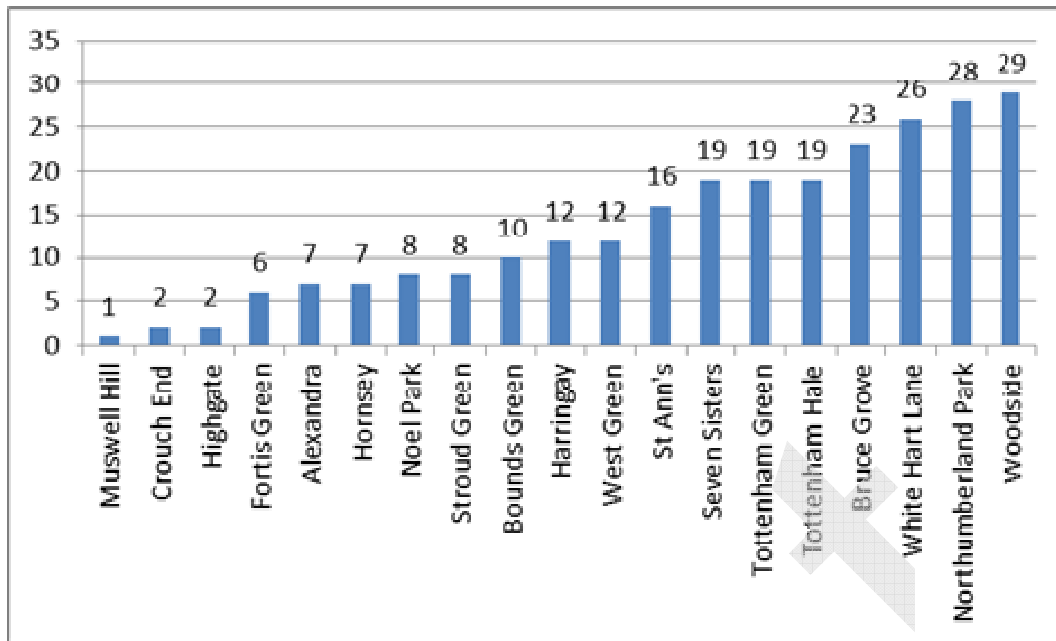
➡ This highlights that over 1/3 (37%) of LAC families are in 4 Haringey wards (Woodside, Northumberland Park, White Hart Lane and Bruce Grove).

➡ This provides a clear framework for ward-based resource prioritisation and targeting.

umberland Park

Sibling Groups

➡ There is currently no local dataset on sibling groups.

➡ Though further analysis is needed when this data is recorded, experience nationally suggests that placing sibling groups is a challenge for authorities and often involves difficult social work decisions when balancing the need for permanence (for example in adoption for a young sibling) with the need to accommodate siblings in the same placement.

➡ Sibling data is therefore important In order to inform sufficiency strategies.

Figure 15: Children in need code of LAC cohort (September 2010 – September 2013)
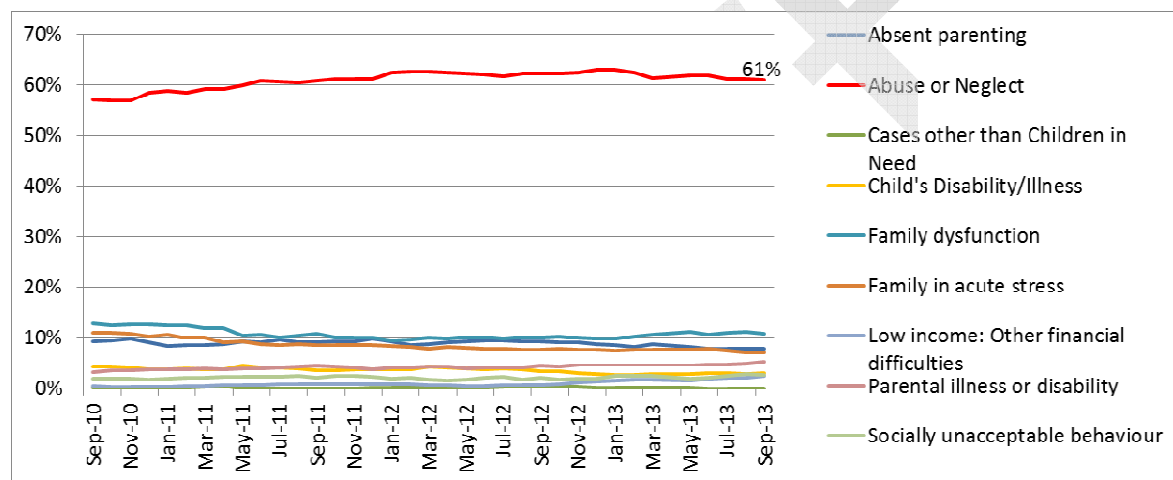
➡ Analysis of children in need codes highlight that, as at September 2013, 61% of cases in care were due to abuse or neglect. This represents a 4% increase since September 2010.

➡ Of the cases in care due to a child's disability/illness, 34% are children with learning disabilities and 11% with multiple disabilities.

Figure 16: Children in care starters by the legal status at the point of becoming looked after (September 2012 - September 2013)
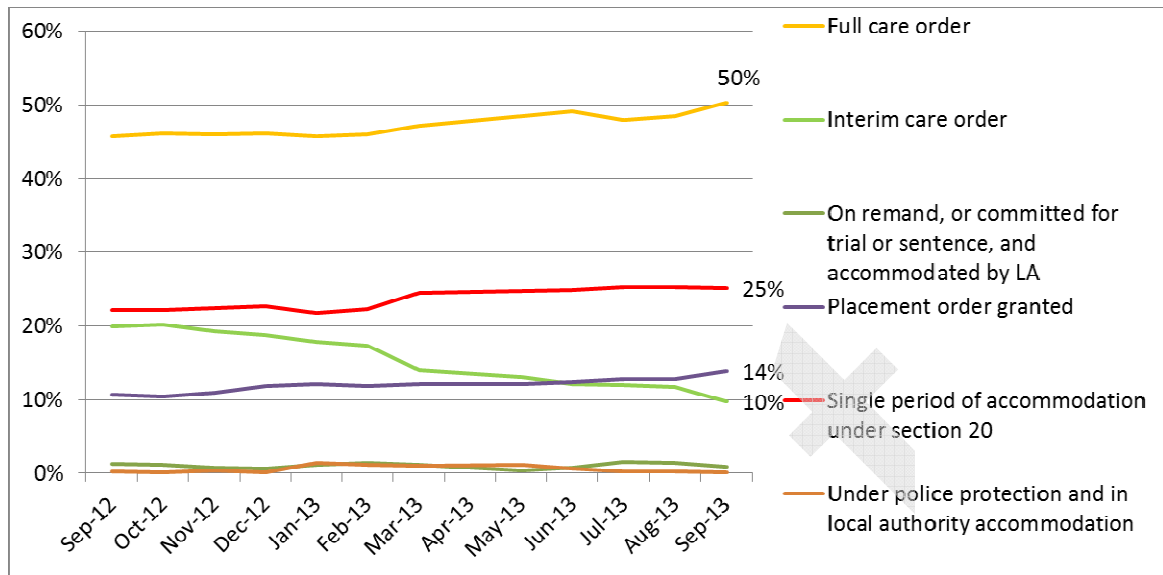

➡ In September 2013, 60% of the children becoming looked after were under care orders (full or interim).

➡ This is similar to the England average (59% in September 2013)[1].

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[1] Department for Education: Children looked after in England (including adoption and care leavers) year ending 31 March 2013

Figure 17: Needs and placement type (September 2012 – September 2013)
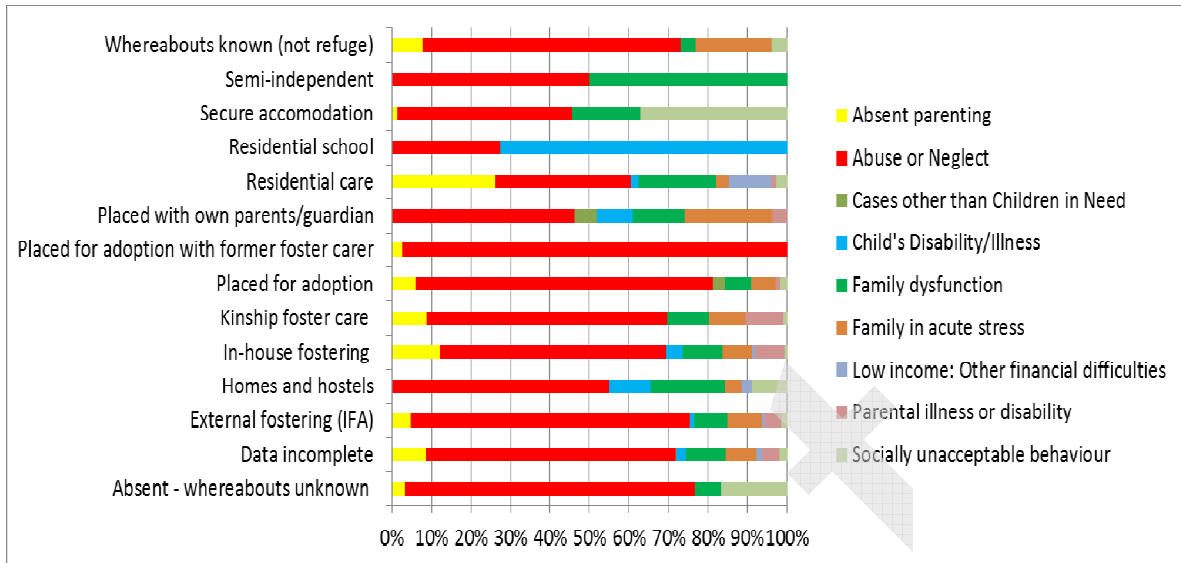
➡ The majority of LAC are in care due to abuse or neglect.

➡ This holds true across most placement cohorts.

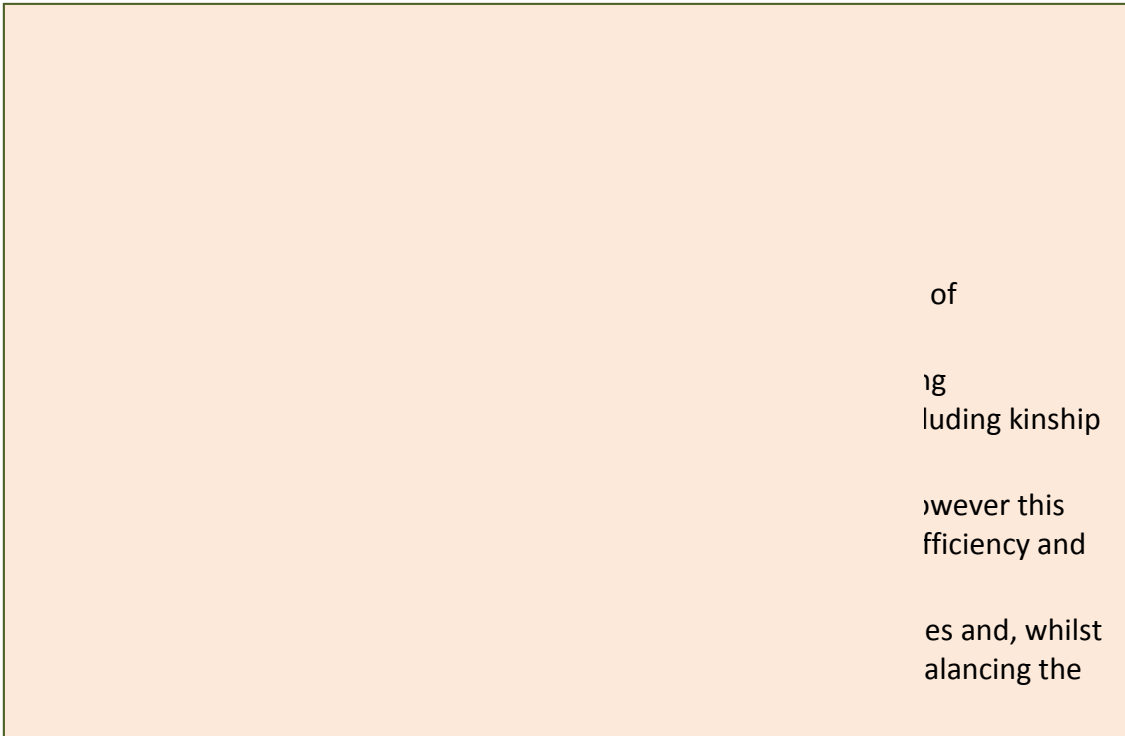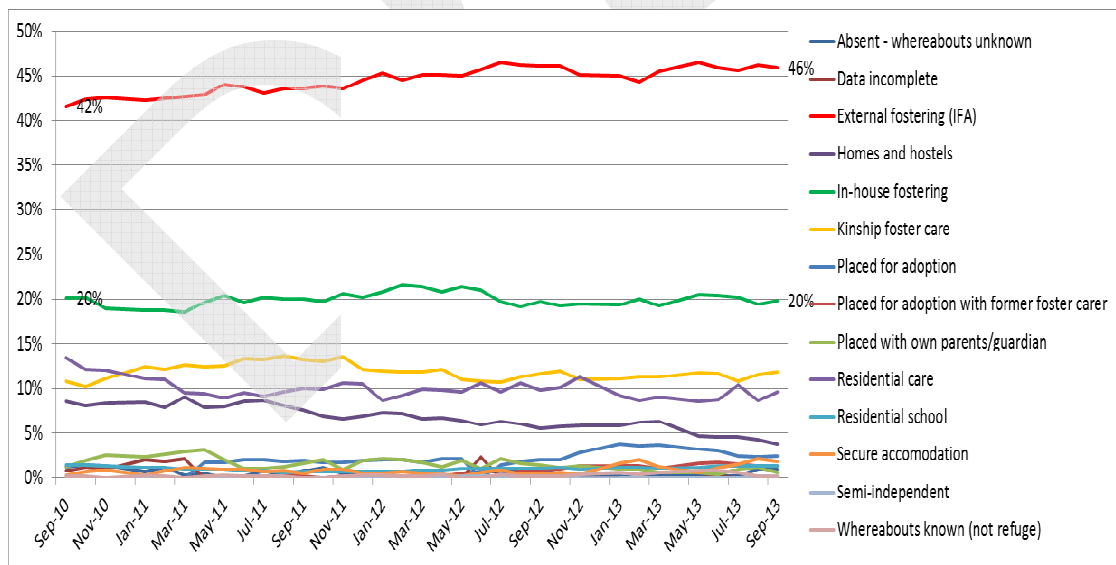> r carers, we will
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8. Placement supply analysis

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**Figure 18: LAC proportions by placement type (September 2010 – September 2013)**

- In September 2013, in-house fostering (excluding kinship) represented 20% of total LAC placements, compared to the 42% of placements with IFAs.
- Of the LAC placed in fostering, only 31% were placed with an in-house foster carer (excluding kinship). This compares to the national average of 69%.

**Figure 19: Proportion of placement days by placement type (April – September 2013)**
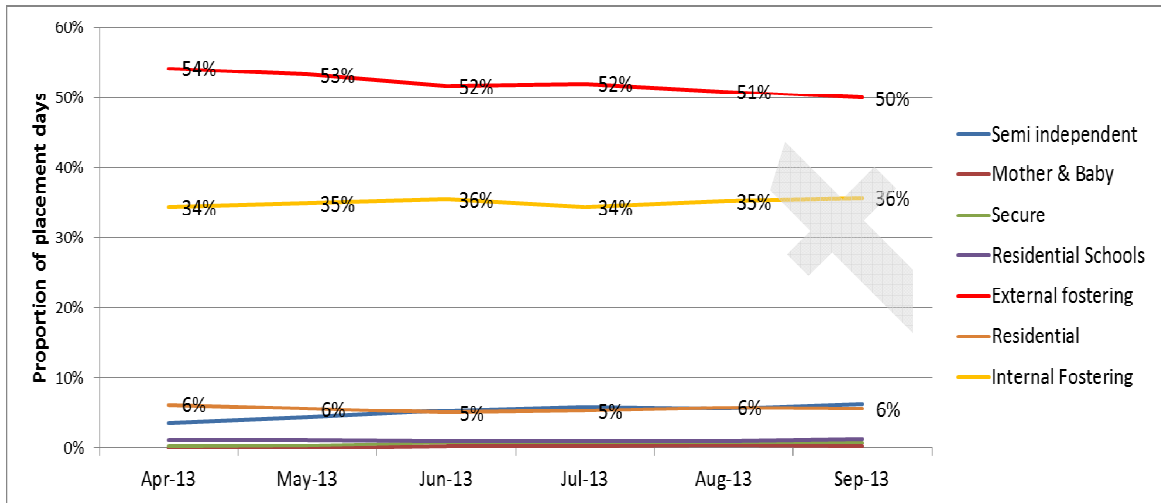
➡ External fostering continues to represent the majority of placement days.

➡ Since April 2013, there has been a 4% decrease in the proportion of placement days with external fostering agencies.

➡ Approximately half of this was taken up by in-house fostering and the remainder by semi-independent placements.

Figure 20: Placement stability - % of children at 31 March with three or more placements during the year
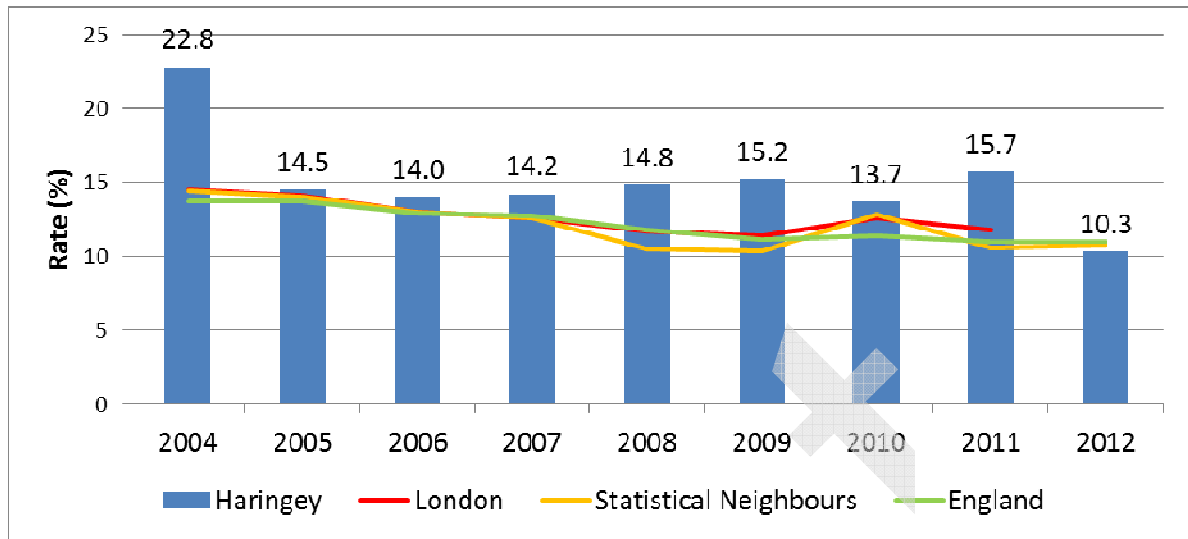
- ➡ Data provided by the Department for Education 'Local Area Interactive Tool' highlights that, in 2012, 10.3% of children had three or more placements during the year. This compares similarly to statistical neighbours.

- ➡ More recent data provided by the Haringey performance team highlights that placement stability continues to improve from 2012 with the latest figure reporting 9% in September 2013.

- ➡ The Corporate Delivery Unit continues to monitor placement stability to ensure that it remains below 10%.

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9. In-house and external capacity

Purpose

➡ To understand the current capacity and composition of the in-house fostering service and externally commissioned placements.

Findings

➡ Haringey has been able to develop a wide range of provider relationships in order to provide placement choice. There are now opportunities to consolidate this success in the market and to add greater sufficiency through the targeted growth of the in-house fostering service.

➡ A large proportion of in-house foster carers are aged between 50 – 59 years, adding pressure to medium term recruitment requirements.

➡ White - British and Other – foster carers are under-represented in the in-house service relative to the LAC population. This is mirrored in LAC placement composition and points to an opportunity to target on ethnicity and / or improve carer training and support to meet cultural needs.

➡ The in-house fostering service accommodates a significantly lower proportion of children aged 5 – 9 years than the independent sector, and there are currently 39 children under 5 placed with IFAs. This highlights the level of opportunity for the in-house service in the event greater capacity can be developed in the short term.

➡ Abuse or neglect is the primary, and growing, LAC need category and IFAs accommodate a greater proportion of these placements. The in-house service will need to continuously develop its specialist support offer in order to meet these needs over the longer term.

➡ The level of utilisation of in-house carers suggests there is scope to provide greater sufficiency from the existing foster carer workforce, through enhanced vacancy management and brokerage processes.

➡ The volume of spot purchasing and procurement outwith frameworks, especially of residential placements, indicates a refresh of commissioning strategies and contract monitoring processes would provide greater choice, value and assurance.

➡ Statistical nearest neighbour cost comparisons, the scale of independent sector business and the wide range of rates also suggest there is an opportunity to develop and leverage more strategic provider relationships.

9.1 In-house fostering service capacity

➡ As at 29th October 2013, there were 111 in-house carers.

➡ The utilisation of in-house carers (excluding short break) was 72% as at 31st March 2013 which is slightly higher than the national average (69%) but lower than best-in-class (85%).

➡ Utilisation is a complex picture, however the overall level indicates scope to enhance sufficiency in the short term through the improvement of vacancy management and brokerage processes.
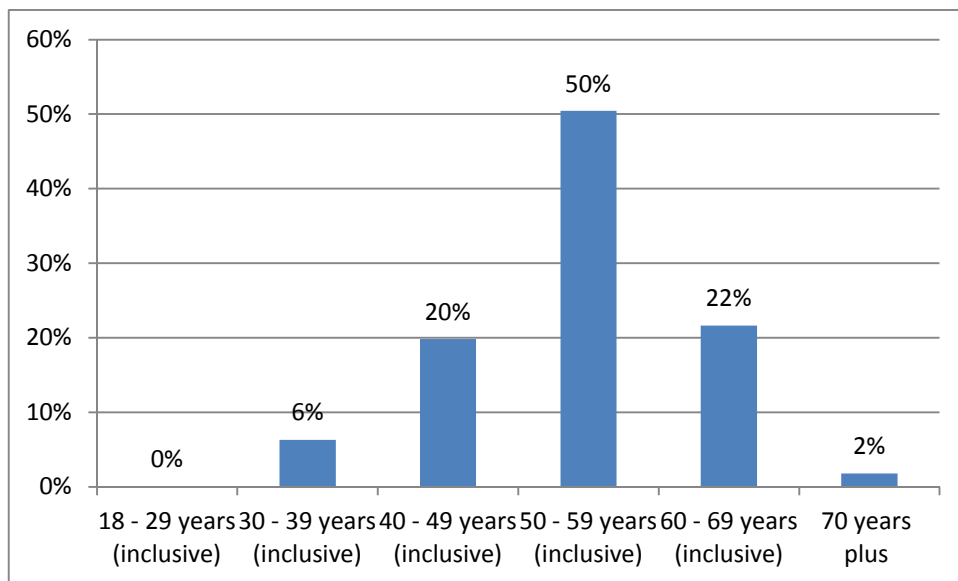
Figure 21: In-house carers by ethnicity (as at 29th October 2013)
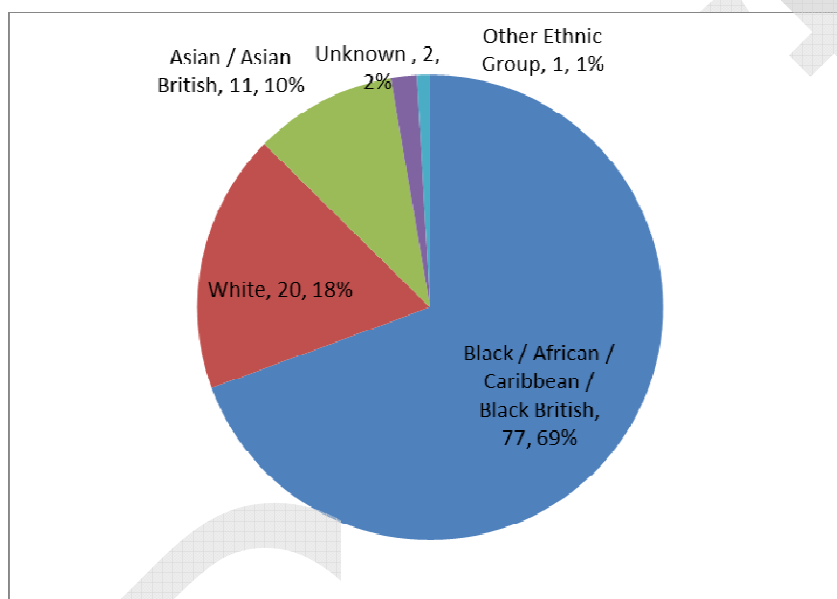
➡ Analysis in this document highlights that 37% of LAC are Black or Black British.

➡ On the 29th October 2013, the in-house carer register highlighted that the biggest proportion of carers were Black or Black British (69%).

Figure 22: In-house carers by age (as at 29th October 2013)

- Half of in-house carers are aged between 50 and 59 years.

- This compares to a national average of 36% foster carers aged 50 – 59 years.

> In-house foster carers have a relatively high age profile and therefore attrition risk. This strengthens the recruitment imperative.
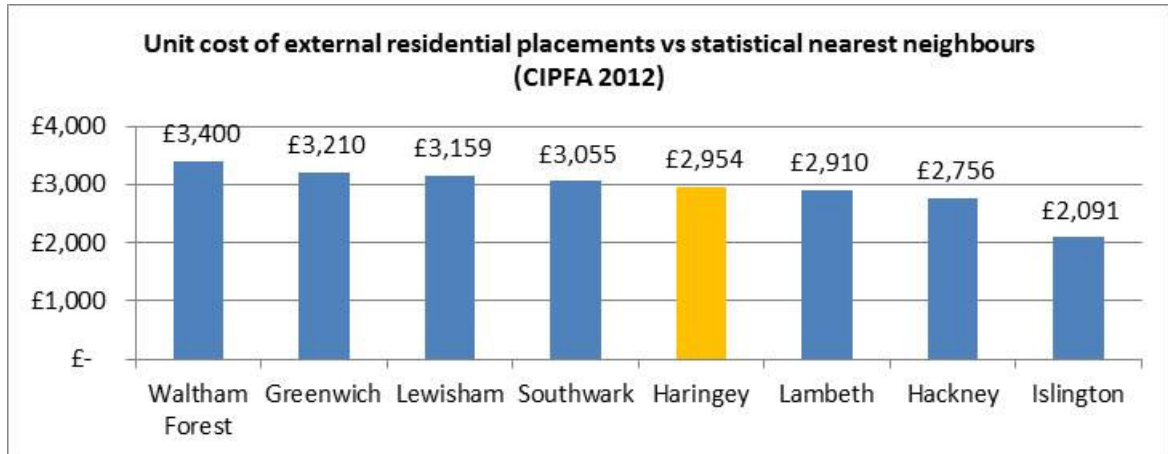
9.2 External capacity

The use of external placements

- The placements service aims to secure best outcomes and best value.

- In-house family placement options are always explored however in light of the capacity constraints in the Haringey fostering service, placements are often procured from independent service providers.

- As this reliance continues, data analysis and interviews with staff have identified a number of challenges with the purchasing of external placements:

   - There are a number of purchasing 'frameworks' in existence for different placement types: Haringey IFA Framework; Haringey Residential Framework; Haringey Semi-Independent Framework; Pan-London IFA Framework.

   - Operational staff have noted opportunities to improve outcomes and value across all of these frameworks, including supporting preferred providers to develop greater capacity more relevant to Haringey's specific needs and investment in compliance and quality monitoring.

   - As a tactical response to these challenges, a growing level of spot purchasing is emerging. This can compound the commissioning issue as provision

becomes more fragmented and there are few formal mechanisms in place to control cost and quality in these instances.

**Figure 23: Residential provision – unit cost comparison (September 2012)**

Unit cost of external residential placements vs statistical nearest neighbours (CIPFA 2012)

Waltham Forest £3,400; Greenwich £3,210; Lewisham £3,159; Southwark £3,055; Haringey £2,954; Lambeth £2,910; Hackney £2,756; Islington £2,091

➡ In 2012/13 39 residential providers were used.

➡ Of these 39 providers, 5 were used for over 1/3 of total residential placements (Little Gems Childrens Home, Hillcrest Residential, Winsbeach Childrens Home, Castle Homes Care and Turning Point Care).

➡ Analysis of the 111 residential placements (not clients) used in in 2012/13, split across the 39 providers, suggests that the majority (at least 61%) of these were not procured through a framework, with the rest largely split between the Pan London (21%) and Haringey (17%) frameworks.

➡ It would appear this fragmented contract landscape has resulted in assurance risks as it is unclear to officers whether strong contracts are in place and whether these contracts are actively managed through, for example, compliance visits. This is partly due to the lack of capacity in the Placements Team.

➡ CIPFA benchmarking data (see above) from 2012 shows that the overall unit cost of Haringey's external residential provision was £2,954, which is a mid-range unit cost compared to the statistical nearest neighbours that took part in the benchmarking exercise.

➡ In 2012/13 the weekly unit cost across different providers varied significantly. The highest was £4,200 and the lowest was £1,000). The unit cost of providers on the Haringey framework / contract list was higher (£2,433) than those on the Pan London Framework (£1,854) or those without a contract in place (£1,829).

➡ Whilst the costs of placements with different providers will to some extent have been influenced by the needs of the individual placement and the quality of provider, the overall picture suggests that there is an opportunity to develop the market - and therefore the quality and value for money of residential provision –

by working more closely with a selection of providers or developing alternative models to providing residential placements.

**Figure 23: IFA unit costs and use of frameworks (September 2012)**

Unit cost of IFA placements, Haringey vs statistcial nearest neighbours (CIPFA 2012)
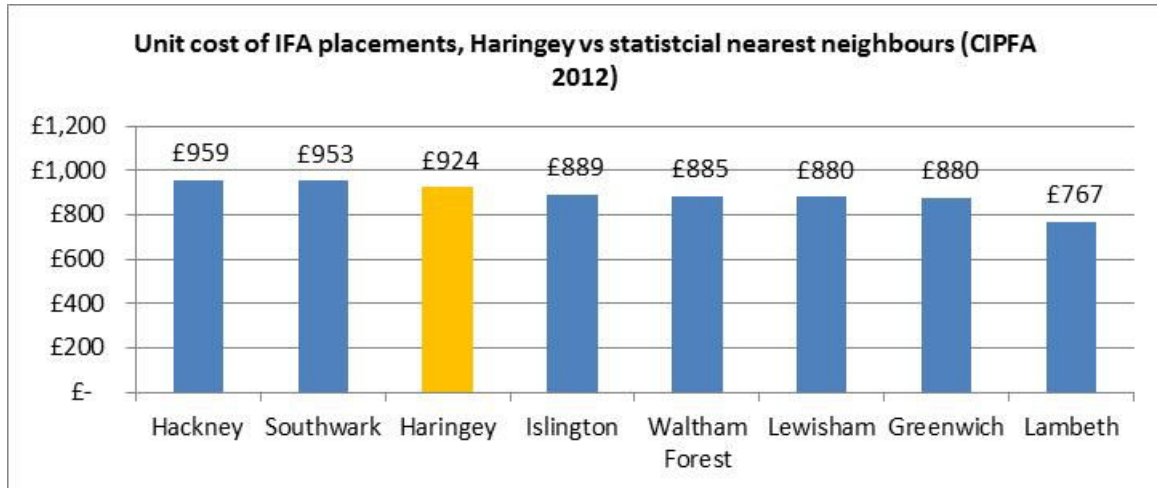
➡ 72 IFAs were used in 2012/13.

➡ Of the 72, 4 providers accounted for 25% of all IFA placements (National Fostering Agency, Kindercare, Capstone Vision and Integrated Services Programme)

➡ Analysis of the 599 IFA placements (not clients) sourced in 2012/13 suggests that the majority of these were procured via the Pan London framework (61%), with a number (24%) placed with providers where a pre-existing contract arrangement did not exist. Very few (less than 15%) were placed via the Haringey fostering framework.

➡ As with residential placements, it would appear that provider commissioning and monitoring would benefit from a more systematic approach, so as to ensure information on quality is readily available to aid decisions on placements.

➡ CIPFA benchmarking data (see above) from 2012 shows that the overall weekly unit cost of Haringey's IFA provision was £924 (full overhead absorption, including central recharges).

➡ Statistical nearest neighbour comparisons, the level of independent sector business, together with the opportunities identified above suggest there is an opportunity to develop more strategic relationships in the market to maximise value.

➡ The weekly unit cost of IFA providers also varied widely between £1,400 and £595, with the majority being between £650 and £850 (before overhead absorption).

➡ Again, officers believe the commissioning actions referenced above would enable Haringey to more consistently access a better rate card.

➡ The findings suggest that there are several opportunities to enhance the IFA market in Haringey, through the development of a new local IFA framework which better leverages the volume of business Haringey places, and with clearer specifications around levels of quality and price for placements.

9.3 Comparison of in-house and external fostering

Figure 24: In-house (excluding kinship) vs. IFA – By Age (September 2013)
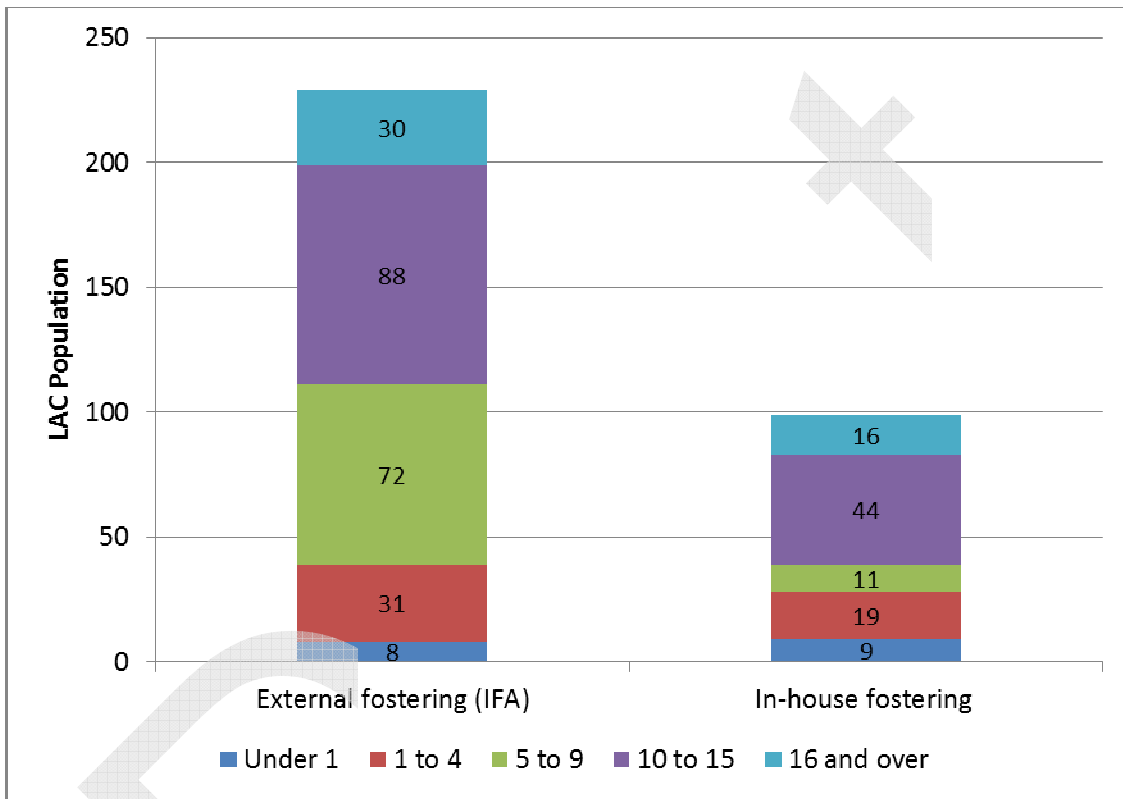
	External fostering (IFA)		In-house fostering	
	Volume	%	Volume	%
Under 1	8	3%	9	9%
1 to 4	31	14%	19	19%
5 – 9	72	31%	11	11%
10 to 15	88	38%	44	44%
16 and over	30	13%	16	16%

➡ In September 2013, there were 130 more LAC in external provision than internal (excluding kinship).

➡ The greatest proportion of LAC placed in fostering are aged between 10-15 across both external (38%) and in-house (44%) fostering.

➡ The greatest difference regarding placement ages is in the 5-9 year old cohort, for whom IFAs provide 72 placements against the 11 in-house.

➡ There were also 39 children under 5 years placed with IFAs.

This pattern highlights that the level of opportunity available to the in-house service in the event capacity can be expanded.
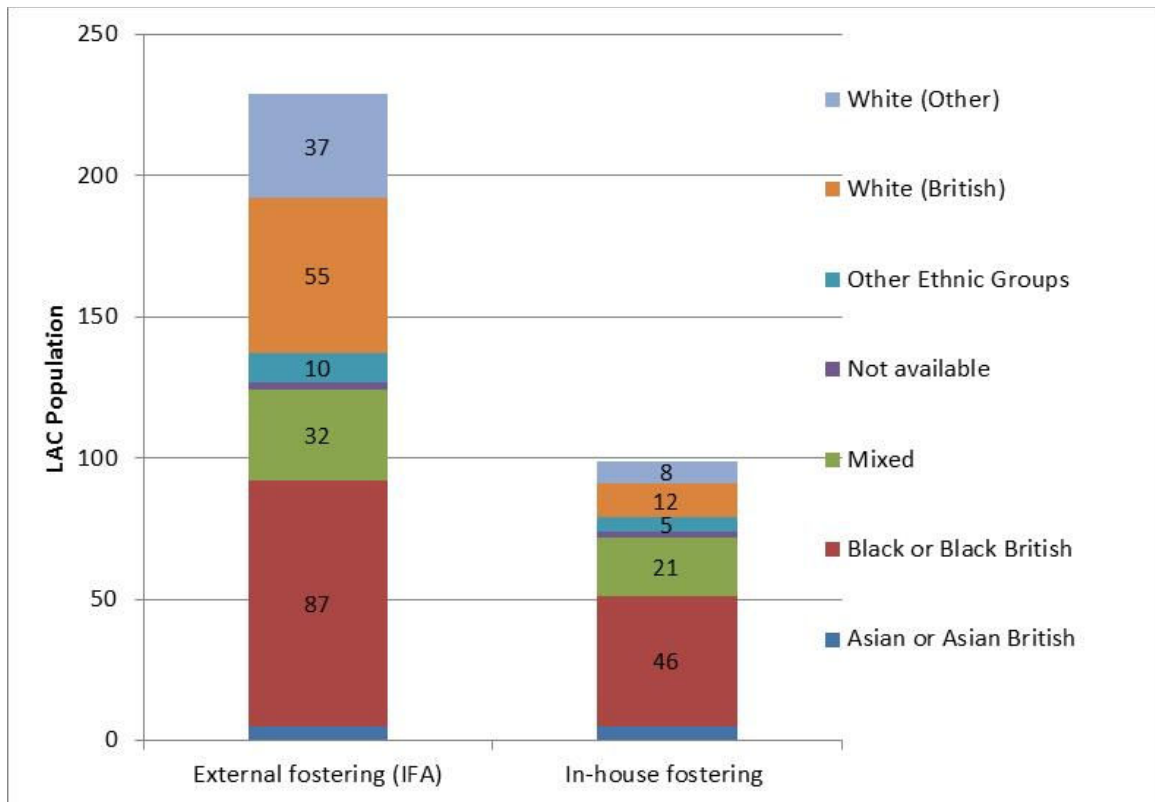
Figure 25: In-house (excluding kinship) vs. IFA – By Gender (September 2013)
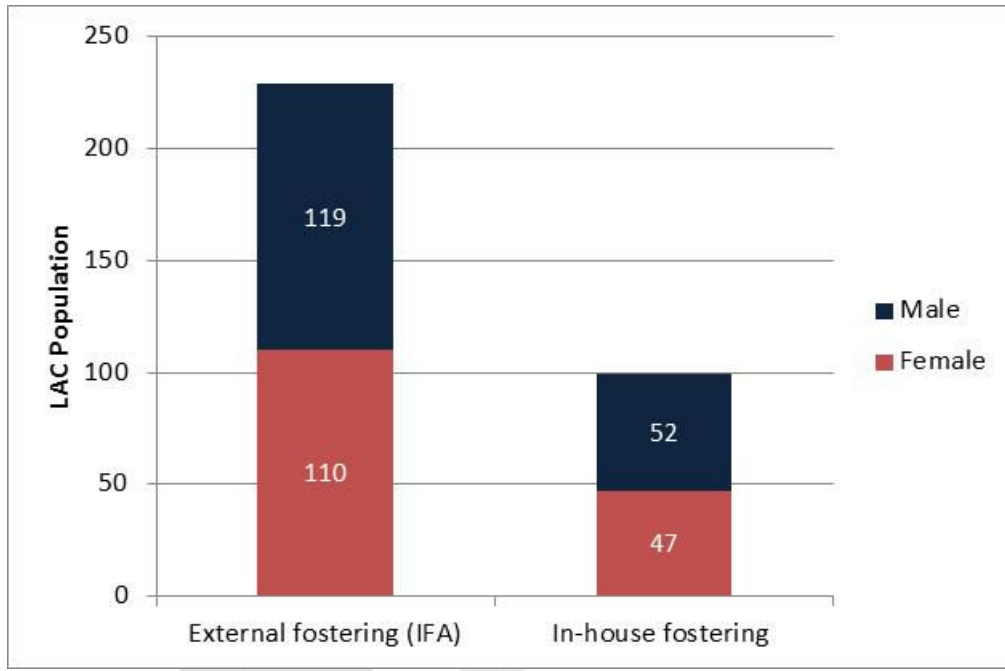
	External fostering (IFA)		In-house fostering	
	Volume	%	Volume	%
Male	119	52%	52	53%
Female	110	48%	47	47%

➡ The proportion of LAC by gender is consistent across external and in-house fostering with approximately 52% males.

Figure 26: In-house (excluding kinship) vs. IFA – By Ethnicity (September 2013)

	External fostering (IFA)		In-house fostering	
	Volume	%	Volume	%
Asian or Asian British	5	2%	5	5%
Black or Black British	87	38%	46	46%
Mixed	32	14%	21	21%
Not available	3	1%	2	2%
Other Ethnic Groups	10	4%	5	5%
White (British)	55	24%	12	12%
White (Other)	37	16%	8	8%

➡ The greatest proportion of LAC are Black or Black British in both external (38%) and in-house (46%) fostering.

➡ The latter may follow from the ethnic composition of the in-house service outlined above (predominantly Black or Black British with a relatively low proportion of White – British or Other).

➡ Consequently, a much greater proportion of IFA placements – 40% compared to 20% of in-house placements – are of White (British or Other) LAC.

➡ Whilst ethnic match is not a necessity to meet the cultural needs of children the ethnic composition of the in-house workforce does therefore appear to have a strong bearing on placements.

Figure 27: In-house vs. IFA – By Need (September 2013)
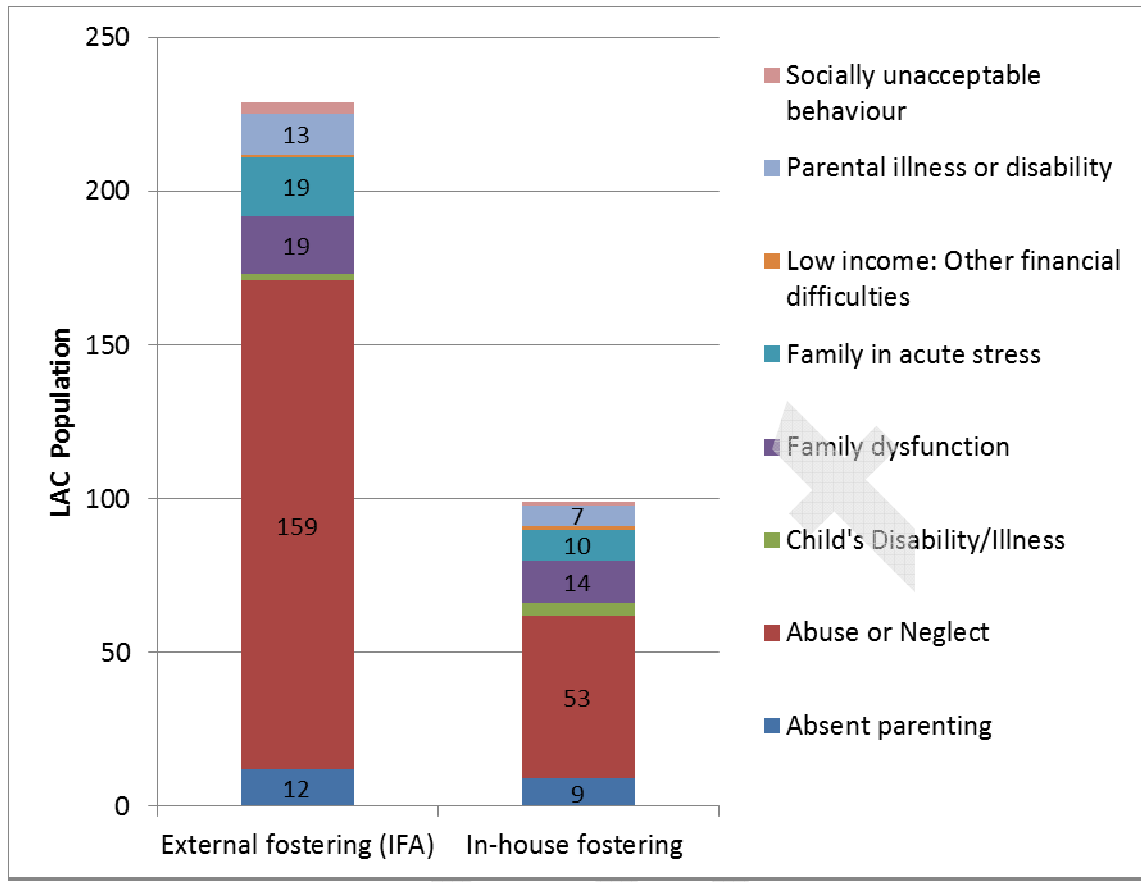
	External fostering (IFA)		In-house fostering	
	Volume	%	Volume	%
Absent parenting	12	5%	9	9%
Abuse or neglect	159	69%	53	54%
Child's Disability/Illness	2	1%	4	4%
Family dysfunction	19	8%	14	14%
Family in acute stress	19	8%	10	10%
Low income: Other financial difficulties	1	0%	1	1%
Parental illness or disability	13	6%	7	7%
Socially unacceptable behaviour	4	2%	1	1%

➡ Abuse or neglect represents the primary LAC need category.

➡ It would appear IFAs have a higher propensity to accommodate this need.

➡ If the in-house service is to grow, it will be important to ensure foster carers have the training, support and resilience to understand and meet these needs.

Average placement distances

➡ The average distance between the foster care household and originating household for children placed with both in-house and IFA carers is 20 miles.

➡ The Corporate Delivery Unit have specified, and now monitor the delivery of, a target to reduce the proportion of Haringey children placed over 20 miles to less than 20 miles.

➡ In 2013/14 to date this has shown a positive direction of travel - the proportion having reduced from 20% to 19% - and further actions are underway to actively review and relocate distant placements.

➡ The need for more local placements again highlights the importance of the development of the in-house service.

10. Financial context and scenarios

> **Purpose**
>
> ➡ To outline the financial context and potential impact of sufficiency development activity.
>
> **Findings**
>
> ➡ Action is required to ensure sustainability, even in the short term.
> ➡ This action will need to impact across both placement demand and supply – placement mix, unit costs and LAC volumes – whilst maintaining or improving quality and outcomes.
> ➡ In the event LAC volumes do not continue to decrease, financial sustainability will depend on a rapid and significant improvement in both placement mix and unit costs.

➡ The Council aims to secure best use of resources at all times.

➡ In the context of placement sufficiency, there are 4 key drivers of sustainability:

1. Quality and outcomes

2. Numbers of LAC

3. Placement mix (blend of placement types), and

4. Unit costs of placements.

➡ Figure 27 highlights that, whilst maintaining or improving placement outcomes, Haringey must continue to influence these drivers in order to provide sustainable sufficiency.

Figure 27: Projected costs and budget assuming key variables (quality, LAC, placement mix and unit cost) are held constant at November 2013 levels

Note: budget estimates are provisional and based on current proposal for 2014/15
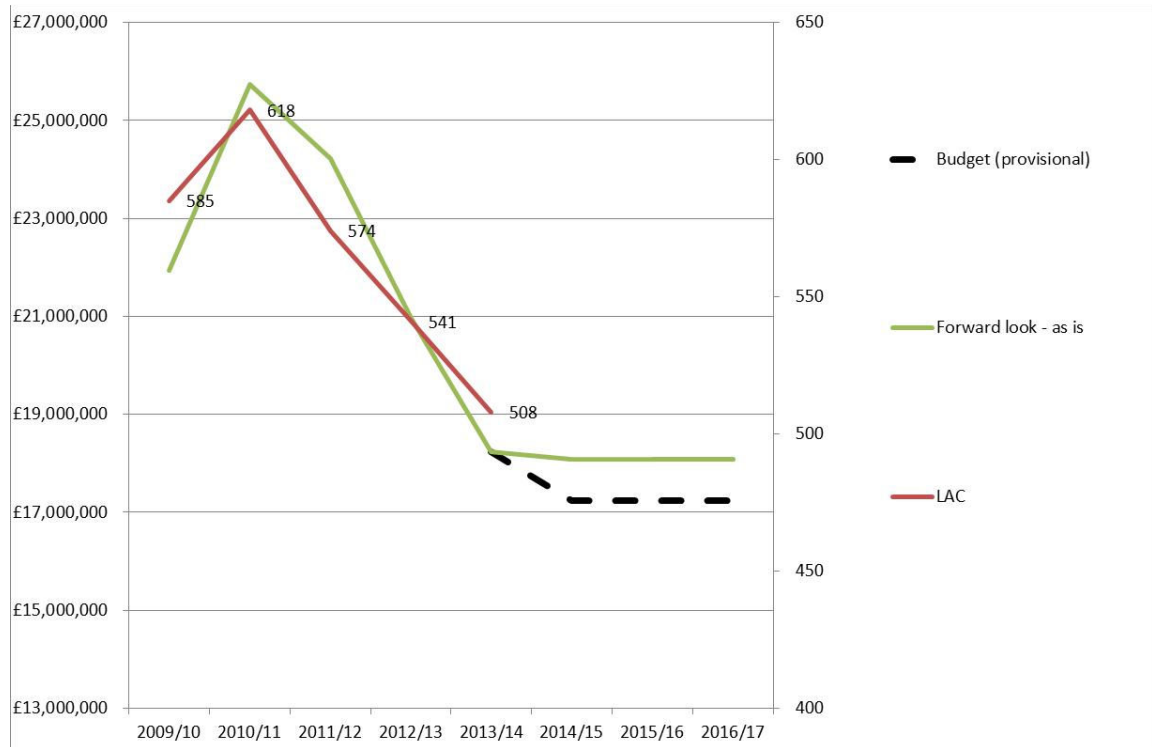
➡ The analysis set out in this document highlights a range of opportunities to influence placement mix and unit costs whilst maintaining and improving quality.

➡ Through this and other live strategies, the Council also aims to reduce LAC numbers.

➡ Based on this analysis, 4 scenarios have been modelled to illustrate the range of opportunity and to inform operational objectives and activity.

➡ These scenarios are not targets but serve to highlight potential financial impact and therefore the case for strategic action.

Driver	Scenario 1
Placement mix	Reverse balance of fostering provision between IFA / in-house 3 year transition resulting in 60% in-house (incl. kinship) provision Year 1 45%, Year 2 50%, Year 3 60% Maintain current level of residential provision at 4% of placements (statistical neighbour average of 4.5%) Maintain blend of all other provision
Unit costs	Remain constant at November 2013 levels
LAC numbers	Remain constant at November 2013 levels

Driver	Scenario 2
Placement mix	Remain constant at November 2013 levels
Unit costs	8% reduction in in-house foster care weekly placement costs to £470 per week excluding central and service overheads (statistical neighbour average £475, national average £390) from 2014/15 2% reduction in average IFA placement weekly placement costs to £780 per week excluding central and service overheads (statistical neighbour and national average £818) from 2014/15 2.5% reduction in average external residential placements weekly cost to £2,732 per week excluding central and service overheads (statistical neighbour average £2,562) from 2014/15
LAC numbers	Remain constant at November 2013 levels

Driver	Scenario 3
Placement mix	As per Scenario 1
Unit costs	As per Scenario 2
LAC numbers	Remain constant at November 2013 levels

Driver	Scenario 4
Placement mix	As per Scenario 3
Unit costs	As per Scenario 3
LAC numbers	Reduce average in-year LAC numbers to: 488 in 2014/15, and 470 from 2015/16 onwards.

➡ The financial impact of these changes is shown in Figure 28 below.

Figure 28: Illustrative sufficiency scenarios – financial impact
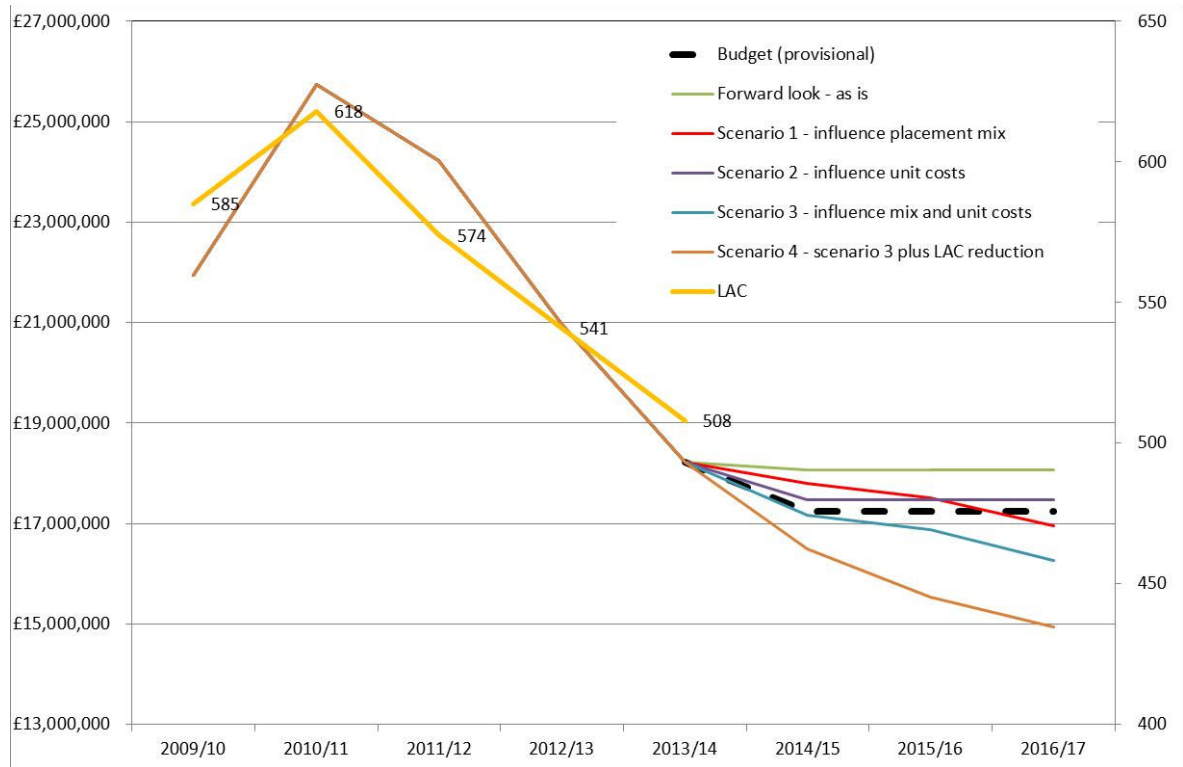
➡ This illustrates that it is likely measures will be needed that affect both placement mix and unit cost in order to deliver sufficiency and sustainability in both the short and long term.

11. Sufficiency plan

➡ This paper has set out the achievements and positive trajectory of Haringey in meeting placement policy objectives and through that, in helping the most vulnerable children in Haringey to thrive and achieve their potential.

➡ The number of looked after children has reduced significantly in recent years, placement stability has improved and alternatives to residential placements have been found.

➡ Throughout the analysis, this paper has also identified opportunities to deliver greater placement choice and therefore better outcomes for children:

   ➡ First, there appears to be scope to reduce LAC levels further through a range of preventative activity and work to facilitate positive exits from care.

   ➡ Second, the in-house fostering service can be grown and developed in response to the needs identified, to allow more LAC to be accommodated more locally.

   ➡ Third, a strategic approach to commissioning arrangements, again in the context of LAC needs, could enable provider partners to respond more effectively and efficiently to Haringey's requirements.

➡ It is also clear from the financial scenarios above that Haringey must act across all of these opportunities to ensure sustainability in the short and long term.

➡ The changes which Haringey is making or plans to make in order to do so are set out below.

➡ Whilst these actions are articulated within the framework of the sufficiency duty requirements (for ease of reference) they together respond to the opportunities above and aim to further reduce total **LAC levels**, achieve a more localised and sustainable **placements mix** and create the conditions for a better deal with the market (lower external **unit costs**).

➡ Broadly, this plan involves:

   ➡ Linking with other strategies – early help, edge of care and permanence – to explore all practical means for jointly preventing the need for care and, when children do come into care, for supporting and accelerating a positive exit. This involves implementing or re-deploying placement supports and expertise further 'upstream' to prevent escalation of need and investment in more effective placement support which enables more children to return home more quickly;

   ➡ An ambitious and carer-centred transformation and expansion of the in-house fostering service. This includes the testing and development of new service delivery models, investment in supervision quality, carer-led design and delivery of new service initiatives in direct response to feedback, and the development of a 'specialist' fostering service offer, and

➡ A more strategic and proactive engagement with the market to build a more acute understanding of local needs and closer provider relationships which enable investment and innovation to meet those needs. This involves the review and rationalisation and framework arrangements and brokerage processes and playing an active role in developing more mature partnerships.

11.1 Sufficiency Duty requirements

➡ The Sufficiency Duty requires that Haringey has systems and processes in place for:

- ➡ Care planning and assessment for individual children;
- ➡ Commissioning individual placements;
- ➡ The strategic analysis of children's needs;
- ➡ Market management;
- ➡ Inter-agency collaboration; and
- ➡ Individual and strategic review of service effectiveness.

➡ For ease of reference, the measures Haringey is taking and will take to develop greater and more sustainable sufficiency are set out below according to these requirements.

11.2 Sufficiency action plan

Sufficiency Duty	Context	Opportunity	Action	Timescales	Lead
Care planning and assessment for individual children	A robust needs assessment is the starting point for all commissioning and brokerage decisions. A care plan which details the needs of the individual and specifies planned outcomes enables officers to commission and providers to design services around the child and innovate where this will improve outcomes. It in turn enables commissioners to set clear performance expectations. An incorrect decision at this point can lead to inefficient or ineffective service provision. Improvements in the capacity, quality or systems for assessment can have a large impact on both outcomes and resources.	➡ To commission placements right first time by improving the quality and consistency of information captured on the Children & Young Person placements referral form	➡ To revise the existing Children & Young Person placements referral form ➡ To run a training session with social workers on how to complete the form and ensure consistency of information ➡ To monitor progress in improvements	➡ By end February 2014	➡ PMc ➡ CC

Sufficiency Duty	Context	Opportunity	Action	Timescales	Lead
Commissioning individual placements	The right decision, first time, is the best way to improve placement stability, service efficiency and effectiveness. Decision-making is most effective when it is informed by the strategic assessment, the resource analysis, the individual assessment and the views of the child. A strong and well-informed decision-making process provides the foundation for.	➡ To commission individual placements right first time by reviewing and improving current brokerage processes	➡ To develop options for enhancing current brokerage arrangements which explores the potential for a single placements team and greater use of 'upstream' data	➡ By end February 2014	➡ CP ➡ AB
		➡ To improve the matching of placements with in-house carers by developing the current vacancy management system/process, and maximise in-house utilisation	➡ To review the in-house vacancy management process and ensure there is an 'upstream' and real-time view of future and current placement capacity ➡ To review all vacant placements or those on hold and develop policies and plans to maximise availability	➡ By end March 2014	➡ PMc ➡ AB
		➡ To improve the matching of placements with external providers by ensuring that management information informs the brokerage of placements	➡ To ensure management information on the sub-regional providers (NLSA) is visible to and informs brokerage decisions ➡ To apply this MI blueprint to all other frameworks and provider relationships	➡ By end February 2014	➡ PMc ➡ AB
The strategic analysis of children's needs	Commissioners are dependent on comprehensive aggregate data about the needs of	➡ To develop a detailed commissioning strategy based on an aggregated	➡ To develop a plan and schedule of activity for ensuring this needs analysis	➡ By end January 2014	➡ PMc ➡ CP

Sufficiency Duty	Context	Opportunity	Action	Timescales	Lead
	looked after children to prepare for the sufficiency duty. The strategic needs assessment is intended to inform the Children and Young People's Plan and commissioning strategies for a range of services.	needs analysis	is updated and developed regularly ➡ To ensure the auditing of case files is fed back to the service at an aggregate rather than individual level		
Market management	Market management is essential to improve outcomes. Commissioners must have effective relationships with all providers (including private, voluntary and public sector providers) to ensure the markets can be incentivised and guided to provide sufficient and appropriate provision. Commissioners must therefore lead the markets and children's services system, including universal services and internal services.	➡ To secure better value from the market by establishing effective and fit-for-purpose frameworks	➡ To establish an approach on the current Haringey & Pan London frameworks and the use of them in the context of the NLSA sub-regional framework ➡ To work with the NLSA to ensure the framework goes live in January 2014 ➡ To work with the placements team to ensure the NLSA framework is embedded as part of the process for commissioning and that tiers of need are effectively mapped and matched to LAC assessments ➡ To work with the NLSA on a longer-term plan which is	➡ By end January 2015	➡ CP ➡ AB ➡ TP

Sufficiency Duty	Context	Opportunity	Action	Timescales	Lead
			informed by our LAC sufficiency strategy and performance information coming out of the year 1 ERP contract		
		➡ To engage with high volume / preferred fostering and residential providers and explore mutual opportunities for shared investment (based on guaranteed business)	➡ To identify providers, share needs analysis and requirements and develop dialogue on options ➡ To test appetite and price points for joint investment in the provision of local Haringey placements	➡ By end March 2014	➡ PMc ➡ CP
		➡ To develop a wider mix of provision for 10-15 and 16+ year olds who are typically difficult to place	➡ To develop an options paper for Fireman's cottage (small residential unit vs. semi-independent living)# ➡ To explore with high volume providers specific opportunities for the development of small scale local residential units and for the provision of specialist foster care capacity or foster carer support / training schemes	➡ By end February 2014	➡ PMc ➡ CP

Sufficiency Duty	Context	Opportunity	Action	Timescales	Lead
		➡ To develop the market for residential provision	➡ To work with the NLSA on a forward plan and approach for the use of residential providers. This will include the NLSA's development of an options paper for the residential market ➡ To prepare a 'requirements blueprint' based on learning from the residential property at Bounds Green ➡ To actively engage the market and explore opportunities for the development of small scale local units	➡ By end February 2014	➡ CP ➡ TP ➡ AB
		➡ To explore and develop the market for alternative foster carer respite schemes and preferred access of LAC or foster carers to universal services	➡ To identify options for short breaks e.g. outdoor education / activity centres (Duke of Edinburgh), engage potential providers and prepare an investment case ➡ To engage LAC and in-house foster carers in a process of needs definition, identify low-cost options for arranging priority access to	➡ By end June 2014	➡ PMc ➡ CP

Sufficiency Duty	Context	Opportunity	Action	Timescales	Lead
			universal services (in which the Council plays a brokerage role) and prepare a case		
		➡ To test and develop the market for innovative shared or external fostering service delivery models (supervision)	➡ To plan and conduct a soft-market testing exercise, , including with neighbouring local authority providers, to identify options for shared or external delivery of the fostering supervision function and to ascertain / develop market appetite	➡ By September 2014	➡ PMc
		➡ To use the skills/knowledge/relationship of the wider Council (e.g. Housing) to support development of the provider market	➡ To work with Housing and the capital programme to identify properties which can be developed into flexible step up/down provision ➡ To work with partners e.g. Outreach / Youth Service / Health / CAMHS in the Children's Trust to explore options for the provision of placement-specific supports (activities, day support, sessional therapies)	➡ Ongoing	➡ PMc ➡ CP ➡ Housing (DG)

Sufficiency Duty	Context	Opportunity	Action	Timescales	Lead
			➡ To work with the Virtual School to consider options for training foster carers in the preparation of PEPs		
Inter-agency collaboration	Collaboration refers to the extent to which partners work together to secure outcomes through commissioning, for example, pooling budgets between the local authority, youth justice services and the CCG; managing special educational needs services and services for looked after children as one category; and procuring external foster care in a framework across several local areas.	➡ To pool resources through the North London Adoption & Fostering Consortium (NLAFC)	➡ To work with the NLAFC to ensure the specialist remand and parent and child foster placements are well utilised ➡ To share foster placements across the 6 NLAFC boroughs (Haringey, Islington, Camden, Hackney, Barnet & Enfield) ➡ To utilise the training (skills to foster) courses available through the NLAFC ➡ To explore options for wider consortium recruitment campaigns	➡ Ongoing	➡ PMc ➡ PS
	Collaboration enables commissioners to take advantage of increased scale, in particular to reduce back-office costs, align services, increase market power and	➡ To work with the CCG to explore how specialist services can be combined and delivered further 'upstream' in order to prevent escalation of	➡ To prepare and consider a joint business case for an intensive care service at home for CYP with a diagnosis of autism and LD ➡ To develop an implementation plan	➡ By end June 2014	➡ CP

Sufficiency Duty	Context	Opportunity	Action	Timescales	Lead
	transparency, and pool commissioning capacity and capability.	complex family needs			
		➡ To improve the quality of information shared with providers	➡ To identify whether we are sharing the latest LAC review documents with our providers ➡ To support providers to develop their business plans (e.g. recruitment activity) by sharing our findings/action plans with the market	➡ By end January 2014	➡ PMc
		➡ To jointly fund placements through the 'complex care panel'.	➡ To build on the work carried out by the 'complex care panel' to identify placements which can be joint funded (CYPS, SEN, Health).	➡ Ongoing	➡ PMc
Individual and strategic review of service effectiveness	There are a variety of commissioning mechanisms and performance management options which can drive particular market behaviours and therefore the efficiency and effectiveness of services. This requires commissioners to be familiar	➡ To include Children & Young People in the performance management of the service	➡ To work with Aspire in developing options for the inclusion of Children & Young People in the development and performance management of the fostering service	➡ Ongoing	➡ PMc ➡ SG
		➡ To increase in-house mainstream foster care	➡ To implement the recommendations of the	➡ By March	➡ PMc

Sufficiency Duty	Context	Opportunity	Action	Timescales	Lead
	with and to employ more sophisticated techniques to optimise outcomes.	capacity	recent service review (improvement and performance management plan), including the engagement of foster carers in the co-design and co-delivery of the service	2014	
			➡ To procure an external recruitment provider to recruit and assess foster carers more quickly, at greater scale and lower cost		
			➡ To strengthen supervision and support capacity and capability through the transfer of in-house recruitment and assessment staff		
		➡ To develop an in-house specialist fostering offer	➡ To develop a methodology for defining target specialist needs (linked to or based on the NLSA framework tier system), such as offending or sexualised behaviour, severe mental illness or disability	➡ Ongoing	➡ PMc
			➡ To test the market for external providers to recruit		

Sufficiency Duty	Context	Opportunity	Action	Timescales	Lead
			and assess specialist foster carers who can accommodate LAC with challenging behaviour/complex needs (e.g. autism)		
			➡ To develop a targeted recruitment campaign for emergency carers, or incorporate this into the contract of the current ERP		
			➡ To consider options for differentiated remuneration / recognition systems for specialist foster carers and develop a cost / benefit case		
			➡ To define the specialist training and development path for current in-house carers and supervisory and brokerage staff		
			➡ To develop a process for planning, approving and brokering (based on the placement plan) specialist placement-specific support services		

Sufficiency Duty	Context	Opportunity	Action	Timescales	Lead
			➡ To map and explore potential specialist support service models / options, including multi-dimensional treatment foster care (MTFC), KEEP, the use of Family Link carers and residential workers, and sessional therapists (clinical pyschologists, play therapists, psychotherapists, skills coaches, tutors)		
			➡ To investigate the prospect of a 'Foster Carers' Academy', centred around a residential hub		
		➡ To implement new supports to enable children to return home	➡ To conduct a soft market test of post-placement family group conferencing services and complete an investment case	➡ By March 2014	➡ PMc
		➡ To explore alternative fostering service delivery models (supervision)	➡ To develop an options appraisal and business case for the external or shared delivery of the in-house fostering supervision function, the subject to the soft market testing and development exercises	➡ By December 2014	➡ PMc

Sufficiency Duty	Context	Opportunity	Action	Timescales	Lead
			above, and the performance of the new in-house service		
		➡ To improve the contract management of external providers	➡ To carry out an audit to ensure all providers have a contract with clear quality and cost parameters	➡ By end February 2014	➡ AB
			➡ To review performance management process on all frameworks (for semi-independent, residential & IFA), including quality assurance visits		
			➡ To ensure standard of care meetings are held by carrying out a review of terms of reference		
			➡ To review the current feedback process on the quality of external placements (to brokerage officers and social workers)		
			➡ To implement additional approval processes for spot purchases		

Sufficiency Duty	Context	Opportunity	Action	Timescales	Lead
		➡ To ensure value for money from our current providers	➡ To review the findings from work with the 'value in care' contract and ensure this informs future commissioning arrangements ➡ To determine whether the contract with 'value in care' be extended by conducting an evaluation ➡ To conduct a random sample comparison of contract rates and billings across all frameworks	➡ By end February 2014	➡ PMc ➡ KS
		➡ To raise the profile of the LAC sufficiency agenda across the wider service and Trust	➡ To develop a plan for a 'LAC sufficiency' event in 2014 (e.g. conference)	➡ By end February 2014	➡ PMc ➡ CP
		➡ To identify cases which can be transferred from high cost external placements to in-house provision	➡ To continue with the external placements review panel	➡ Ongoing	➡ PMc

12. Appendix 1: Excerpt from the Children Act 1989

22G General duty of local authority to secure sufficient accommodation for looked after children

(1) It is the general duty of a local authority to take steps that secure, so far as reasonably practicable, the outcome in subsection (2).

(2) The outcome is that the local authority are able to provide the children mentioned in subsection (3) with accommodation that—

>   (a) is within the authority's area; and

>   (b) meets the needs of those children.

(3) The children referred to in subsection (2) are those—

>   (a) that the local authority are looking after;

>   (b) in respect of whom the authority are unable to make arrangements under section 22C(2); and

>   (c) whose circumstances are such that it would be consistent with their welfare for them to be provided with accommodation that is in the authority's area.

(4) In taking steps to secure the outcome in subsection (2), the local authority must have regard to the benefit of having—

>   (a) a number of accommodation providers in their area that is, in their opinion, sufficient to secure that outcome; and

>   (b) a range of accommodation in their area capable of meeting different needs that is, in their opinion, sufficient to secure that outcome.

(5) In this section 'accommodation providers' means— local authority foster parents; and children's homes in respect of which a person is registered under Part 2 of the Care Standards Act 2000."