



## **What is a suitable placement for an unaccompanied asylum seeking child? – Information for local authorities to accompany the national transfer protocol for unaccompanied asylum seeking children. (Revised April 2018)**

Each unaccompanied asylum seeking child should be assessed and a decision made about which placement will suit them best.

**The Department for Education Statutory guidance on Care of unaccompanied migrant children and child victims of modern slavery (2017)** sets out the steps that local authorities should take to plan for the provision of support for looked after children who are unaccompanied asylum seeking children, including where the individual is a victim of trafficking. The guidance states that:

“Placement decisions should take particular account of the need to protect the child from any risk of being exploited, and from a heightened risk of them going missing. Transfer to the care of another local authority or an out of area placement might in some cases be appropriate to put distance between the child and where the traffickers expect them to be.”

It is important that suitable emergency accommodation can be accessed directly at any time of the day or night where there is sufficient supervision and monitoring by on-site staff to keep the child safe. Bed and breakfast (B&B) accommodation is not suitable for any child, even on an emergency accommodation basis. Such accommodation can leave the child particularly vulnerable to risk from those who wish to exploit them and does not cater for their protection or welfare needs.

Often very little information about the young person is available in the first few days and so it is highly likely that a permanent placement decision will not be made immediately. A temporary placement can enable the child or young person to feel safe and physically recover from their journey and be able to engage with an assessment of their needs with the help of interpreters where necessary.

An unaccompanied child is likely to have developed survival skills and possibly a veneer of being able to cope, which may mask their actual needs. Assessments should be carefully completed before assuming any level of physical, social and emotional resilience. An assessment of needs should include (but not be limited to) language and communication skills, ability to buy and cook food, ability to care for themselves and keep themselves safe, their understanding of British laws and social customs, and their ability to access education and public services (including GP and dentist).

It may be that a young person would benefit from being in a placement with a high level of support initially and then when they are ready they can move on to a placement with a lower level of support.

The placement decision will also need to be informed by careful consideration of the wider support needs of the child, including their cultural and social needs. It may be that the accommodation setting or carers cannot meet those needs on their own so



other more creative ways, such as mentors or links to diaspora groups, could be used. As with all looked after children, an unaccompanied child's ethnicity, cultural and linguistic background should be taken into account when placing the child with foster carers. However, these are not overriding considerations and should be taken into account alongside all of the child's needs. A child's background is an important consideration, but provided the placement is the most appropriate placement available and safeguards and promotes the child's welfare, it is not necessary to find a foster family that exactly matches the child's background. What is important is that the placement is the most appropriate available, is able to meet the child's needs as a whole and is consistent with their wishes and feelings.

Because of their past experiences and ongoing difficulties, unaccompanied asylum seeking children have a high risk of experiencing psychological distress, including sleep disturbances, attention and concentration difficulties, flashbacks of previously experienced trauma and post-traumatic stress disorder (PTSD). It is important that carers are able to identify possible indicators of mental health issues.

All residential home staff, foster carers or support workers of semi-independent accommodation caring for unaccompanied children and child victims of modern slavery (including independent advocates where appropriate) should be aware of any particular risks of them going missing, or of any risk to the child from those who wish to exploit them. They should also know what practical steps they should take in the event that the child does go missing, or if they suspect that someone is trying to lure the child away from their care placement. Carers should also be fully aware of the child's past experiences and any psychological issues they face, which may not be immediately apparent, as well as understanding cultural issues, which may put them at greater risk of going missing. This may include the potential negative impact of protection measures which may appear to the child to replicate methods used by their traffickers to control them (see further information on accommodation for trafficked children below).

## **Placement options**

All looked after children must be placed in accordance with section 22C of the Children Act 1989. In addition **The Children Act 1989 Guidance and Regulations, Volume 2: Care Planning, Placement and Case Review**<sup>1</sup> is statutory guidance relevant for the care of all looked after children and states that there are a range of placement options which may be suitable, some of which will only be suitable for older children who require more independence :

### **Residential Care Home**

Care within an Ofsted registered and inspected children's residential care home.

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[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/441643/Children\\_Act\\_Guidance\\_2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/441643/Children_Act_Guidance_2015.pdf)



### **Foster care**

Care in a family setting either in a placement in an Ofsted registered and inspected placement with an Independent Fostering Agency foster carer or in a placement with a local authority foster carer.

### **Semi - Independent living arrangements or “other arrangements” including supported lodgings, supported accommodation and shared housing.**

These forms of accommodation are usually for older children, who require less intensive support and close monitoring and only require accommodation, not care and accommodation. Where there has been an assessment of need of a young person and the best match to their needs is in “other arrangements” the placement could be supported lodgings, supported accommodation or shared accommodation.

These forms of accommodation are covered by the Care Planning, Placement and Case Review (England) Regulations 2010 (the Care Planning Regulations) and may be evaluated on the suitability to meet the needs of the individual children as part of Ofsted inspections of local authority children’s services and also when the use of “other arrangements” is looked at.

Statutory guidance and the Care Planning Regulations clearly set out that in some cases, a child can be suitably placed in accommodation termed as “other arrangements” and regulation 27 sets out the duties of a local authority when placing a child in such arrangements. This type of accommodation is not registered by Ofsted and is “unregulated” in the sense that in the same way that a registered children’s home or foster care provider is registered and inspected because it does not meet the requirements under the Care standards Act 2000 to be registered. However the Care Planning Regulations explain when and how local authorities might use them and factors that must be considered in determining whether the accommodation is suitable to meet the individual needs of the children.

The local authority must be satisfied that any such placement is in the best interests of each individual young person, with practice in line with all relevant statutory guidance and the Care Planning Regulations. (See below for some considerations when commissioning supported lodgings or supported accommodation provision.)

### **Supported lodgings**

Supported lodgings are a service which can allow an individual to live in a family home, experiencing domestic life in a shared and supportive environment, but with a lower level of monitoring than in foster care. The young person has their own room and shares the kitchen and bathroom facilities with the family or householder - or ‘host’. Similar to foster carers, hosts can be families, couples or single people.

The accommodation is a furnished bedroom in a domestic house, with use of WC, bathing, cooking and laundry facilities as a member of the household. The householder/host is resident full time in the property but pursues their own lifestyle (including daily routine, absence at work, holidays and weekends away). They provide a home-like environment and domestic routine consistent with the young



person engaging in education, training or work, including the provision of some meals. They establish an appropriate and consistent personal relationship with the young person, including non-intrusive practical help and advice.

The service provider (a local authority or independent organisation) undertakes recruitment, scrutiny and approval of a host's accommodation and suitability to work with vulnerable young people in an unsupervised home environment. They typically provide general skills development, training and experience-sharing events for host families.

### **Supported accommodation**

Supported accommodation typically has multiple rooms and young people can provide peer support to each other on accessing services, local facilities and learning English. Staff are available on site (often 24/7) and typically have experience in helping young people to settle in and begin to develop independent skills. They will be trained in safeguarding children issues, and will be responsive to feedback from the young people placed there. They are not though providing care, in the form of cooking meals, managing money, laundry, and granting permission to go out or stay away overnight. Where care and accommodation which meets the definition of a 'children's home' is being provided the provision should be registered with Ofsted.

Supported accommodation may include study areas, outside space and a communal meeting room. Staff and health providers are able to run sessions to support the development of independent living skills, support with homework and meeting others. Security can be tailored to the needs of the young people, for example, some have all visitors and guests sign in and out, and CCTV.

Good supported accommodation will provide a supportive environment in which unaccompanied asylum seeking children can learn to develop and grow. This can serve to nurture a sense of belonging – strengthening their confidence and trust in adults – and providing them with the emotional stability needed to develop positive friendships and engage with their wider community. House meetings can provide an opportunity to encourage young people to eat together and share, whilst also providing them with a forum to air any frustrations within the community and to teach them resolution skills.

### **Shared housing**

Shared housing is a multiple occupancy house, shared between other unaccompanied asylum seeking young people (and sometimes some non-asylum seeking young people) to provide peer support, with additional visiting support. This type of accommodation allows young people to live very independently but usually with visiting support – which should be tailored to the needs of the individual young people.

It may be that a young person moves into shared housing arrangements following a period of time in a placement with more supervision where their independent living skills and ability to manage their own health needs could be fully assessed.



## Key workers

If the child is placed in either supported accommodation or shared housing, it is important that each young person should be assigned their own key worker who can build rapport, work with them to support their needs and liaise with the local authority social workers or housing team to ensure continuity of care. The child needs to understand who their key worker is and have easy access to them.

## Accommodation for trafficked children.

The ECPAT (2011) report *On the Safe Side: Principles for the safe accommodation of child victims of trafficking* sets out some key considerations when assessing the most suitable placement for an unaccompanied child who may have been trafficked:

*“There is no ‘one-size-fits-all’ accommodation for children who have been trafficked. The benefits of any particular form of accommodation depend on a child’s personal needs and circumstances, including their relationship to their trafficker/s and level of risk; the type of exploitation they were subjected to and how traumatised they are; their culture, age, sex and personality; their sense of personal autonomy and ability to live independently; and their sense of safety and ideas on what will make them feel safe.*

*For example, for some children, fostering is a ‘culturally bound concept’ that is difficult to relate to because of their personal experiences of being exploited. Some children who are used to living more independently can reject the idea of ‘having a substitute family’, while others feel pressured to bond with their foster family at the cost of ‘betraying their birth families’. Some young people feel more comfortable living in a group setting, which may feel less intimate, with a staff group providing care, access to care, access to peers (some with similar experiences) and group activities including therapy.*

*Professionals often have different opinions about what determines a child’s best interests. Challenges include working with agencies that are ‘resource-led’ and have different work cultures and priorities, and working with needs assessments that are not properly completed or sufficiently focused on trafficking. Face-to-face meetings as soon as possible after first contact with a child can help professionals come to a shared determination of a child’s best interests. Assumptions by professionals about a child’s needs, such as finding a ‘cultural match’ in a foster family, can lead to unsuitable placements.” (p.13)*

When making a placement decision about a child who has been identified as having been trafficked it may be that one of the forms of accommodation above may be tailored to enable children to be more intensively engaged by carers or staff at the beginning of their time being looked after to help prevent onward trafficking. Higher levels of supervision and monitoring may be necessary. This may involve the use of a safety plan to prevent children going missing immediately to return to their traffickers, which can then be reviewed regularly as circumstances evolve.

Where a child has been identified or suspected as having been trafficked there will be a range of issues which need to be understood when making a decision about a suitable placement. Importantly, regardless of the *type* of placement that is used, carers and staff should have an understanding of the narratives used by traffickers to control children, and have the skills to build trust and a relationship with the child, which can be the most crucial element to overcoming the narrative.

The following documents provide further information and advice::

**Safeguarding children who may have been trafficked, Department for Education and Home Office, 2011.**

<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

**On the Safe Side: Principles for the safe accommodation of child victims of trafficking, ECPAT, 2011.**

[http://www.ecpat.org.uk/sites/default/files/on\\_the\\_safe\\_side.pdf](http://www.ecpat.org.uk/sites/default/files/on_the_safe_side.pdf)

**Considerations when commissioning a supported lodgings provider**

- Are there clear and robust assessment, approval and ongoing monitoring and review processes in place to determine the suitability of hosts?
- Do all hosts participate in an induction programme which includes awareness raising about all aspects of the Supported Lodgings Service and training on safeguarding?
- Is there a suitable safeguarding policy?
- Is there a protocol in place for a trafficking risk assessment and referral to the National Referral Mechanism?
- Is ongoing training provided, which is also offered to family members, to enhance their knowledge and skills based on an analysis of individual learning and development needs?
- Are arrangements in place to provide ongoing support to hosts through the appointment of a named worker to each host by the Service Provider?
- Do support arrangements for hosts also specify access to out-of-hours assistance?
- Is a mechanism in place for hosts, including those who are not deemed suitable, to make representations or a complaint?
- Is there a written protocol to be followed in the event of an allegation being made about a host? Do both the young person and host know how they will be supported in the event of an allegation being made?
- Do hosts receive advice on allowances payable for the provision of accommodation and support to the young person placed in their home in accordance with established financial policy and procedures, including implications for their personal income including tax implications?
- Have arrangements been made by the host for meeting any public legal liabilities as a result of a Supported Lodgings placement?





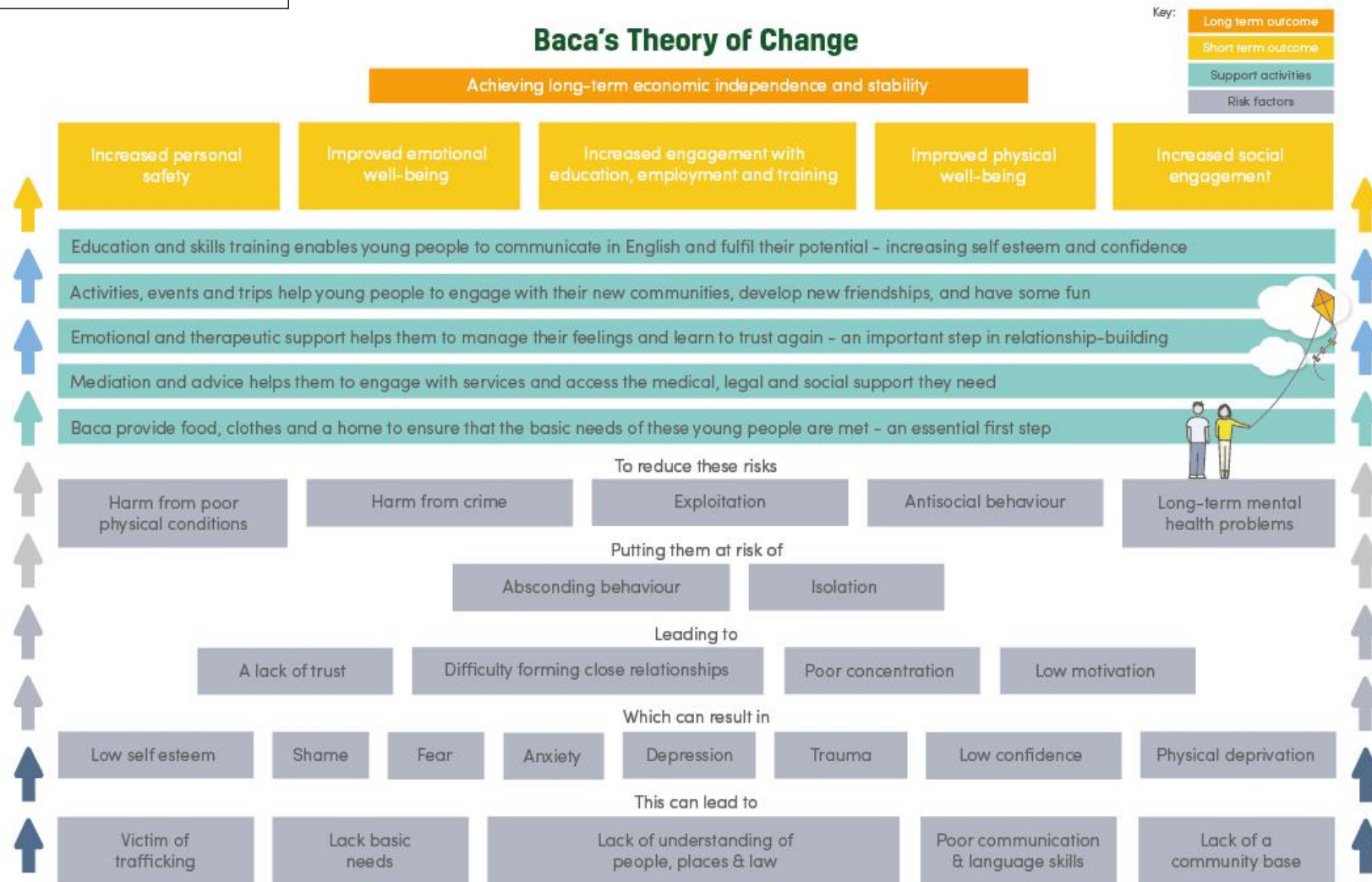
- Are hosts aware of their obligations to inform the police and the responsible local authority if a child goes missing?

### **Considerations when commissioning supported accommodation and shared accommodation**

- Are there robust systems of recruitment, induction, supervision and development of support staff?
- Do support staff undergo specific awareness training in cultural awareness, differing religious needs and legal support required when working with unaccompanied asylum seeking children?
- Do all support staff participate in an induction programme which includes awareness raising about all aspects of the service provision and training on safeguarding?
- Is ongoing training provided, to enhance staff knowledge and skills based on an analysis of individual learning and development needs?
- Is there a suitable safeguarding policy?
- Is there a protocol in place for a trafficking risk assessment and referral to the National Referral Mechanism?
- Are there clear processes for receiving new arrivals to ensure all immediate medical, physical, legal and safety needs are met?
- Is accommodation located in a safe area where there is reasonable access to support networks (cultural & religious), health and leisure services and other amenities?
- If there is any point in a 24 hour period where staff are not on the premises, is there clear access to out-of-hours assistance for children?
- Is there a written protocol to be followed in the event of an allegation being made about a support worker? Do both the young person and support worker know how they will be supported in the event of an allegation being made?
- Are there clear processes to ensure the property is safe and secure for the children.
- Does the setting meet the definition of a “children’s home”? If it does it would need to be registered as such.

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UASC arriving in the UK are often traumatised from their journey, from the experiences that initially made them flee and from exploitation that may have occurred through trafficking or other violence.