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## **Department for Education call for evidence on the children's homes workforce**

1. The Association of Directors of Children's Services (ADCS) welcomes the opportunity to respond to the Department for Education's (DfE) children's homes workforce call for evidence. This has been launched in response to a recommendation made by the Independent Inquiry into Child Sexual Abuse (IICSA) about the need for professional registration of care staff in children's homes. ADCS is the national leadership organisation for directors of children's services (DCSs) in local authorities across England under the provisions of the Children Act (2004). The DCS acts as a single point of professional leadership and accountability for services for children and young people in a local area, including children's social care and education.

## **Registration of care staff and managers**

2. Staff working in children's homes must currently undertake a mandatory Level 3 Diploma for Residential Care within two years of employment. However, due to high levels of staff turnover, few staff are able to complete the qualification within the required two year period resulting in a number of staff who have not yet achieved the qualification. Further, managers must be registered with Ofsted and achieve a Level 5 Diploma in Leadership and Management for Residential Care within three years of employment and this role is also impacted by a high turnover of staff. Children's homes are inspected by Ofsted, however, there is no developed professional standard for care staff in children's homes.
3. Currently, the HCPC regulates health, social work and psychological professions and will only regulate a new profession when there is a compelling case to do so. Registration with a new independent body would be disproportionately costly due to the relatively small number of care staff in children's homes. ADCS therefore believes that if registration is deemed necessary, registration with the HCPC should be considered.
4. Registration of managers and care staff, if underpinned with a code of practice and professional standards, would enable greater consistency across the workforce, however, this would need to be implemented in a way that does not duplicate the assessment of fitness to practice in order to limit potential costs. Further, if professional registration is introduced, this may require re-registration of staff on a periodic basis and could be resource intensive and have financial implications. The costs associated with a requirement for children's homes staff to be registered will likely be passed onto the local authority. At a time when the cost of placing a child or young person in an independent children's home is very high, ADCS is concerned

that additional costs incurred by local authorities will place extra pressure on already heavily reduced budgets.

5. ADCS urges the government to consider the recommendation's impact on the recruitment and retention of care staff if professional registration were introduced. It is important that children's homes have a rich diversity of care staff and there is a risk that this proposal may have an adverse impact on recruitment if not carefully considered. If mandatory registration is introduced, this should encourage children's homes to concentrate on CPD that is more practical and specifically focuses on supporting children and young people.
6. The current Quality Standards within the Children's Homes Regulations set out the outcomes that each child or young person must be supported to achieve while living in a children's home. In order to improve the number of qualified staff, a new Quality Standard could be introduced that requires children's homes to state in their statement of purpose the number of staff that have achieved their mandatory qualification and how many are working towards this.
7. ADCS urges the DfE to also consider the capacity, training and developmental needs of other parts of the wider children's workforce. ADCS recently published a position paper [\*Building a workforce that works for all children\*](#) and recommended the DfE develop a coherent workforce strategy to address capacity issues and ensure that adequate and up to date training is readily available for the whole children's workforce. Many parts of the wider workforce that do vital work with children and families have suffered due to cuts to local authority budgets and these should receive equal focus.

### **Training and qualifications**

8. The current Level 3 qualification for care staff and Level 5 qualification for managers are not always achieved by all staff in children's homes, however, homes do provide training for their staff which is equally valuable and also suited to their specific needs. There is a concern that the current qualifications do not provide the kind of learning that would suit care staff who may benefit from more practical training. Residential care is primarily about operating in a group living environment and this kind of interactive learning could be mirrored in mandatory qualifications.
9. The DfE should consider the use of equivalent qualifications that can be transferred between related occupations across the children's workforce. For example, a Level 3 or Level 5 qualification in an occupation that requires similar skills and competencies to working in a children's home could be considered, subject to filling any specific gaps in knowledge. This would help improve workforce capacity not only in the children's homes workforce but also across the whole children's workforce.

10. ADCS believes the DfE should review training that is currently provided by children's homes so that the knowledge learned from this can be used to create a more flexible training requirement for staff. Given the wide variety of children's homes in operation, this should be developed with the sector and provide a level of flexibility that meets the specific needs of the type of children's home and its statement of purpose.