

Unregulated & Crisis Placement Guidance

This guidance defines what both a crisis and an unregulated placement are in relation to children services placements. It outlines the processes undertaken when considering such placements and the risk mitigations in place.

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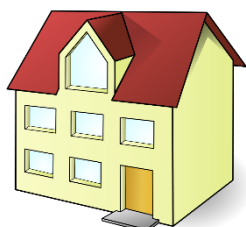
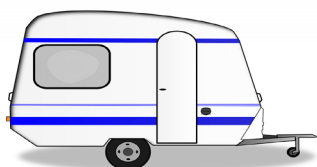
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1. What type of placement is deemed a crisis placement?



- For the purposes of this guidance, a crisis placement relates to a placement that is available for a child/young person **immediately** for a **set period of time**.
- These can be activity based placements, outward bound placements or placements in a children's home for a limited time period.
- The duration of the placement will vary and is usually set by the provider. They range from 28 days to 90 days.

2. What type of placement is deemed an unregulated placement?



- Some establishments and types of accommodation are not required to register with Ofsted. These are sometimes known as 'unregulated settings'.
- A service where the accommodation is **not permanent** (such as a tent) or is **constantly moving** (such as a boat, narrow boat or motorised caravan), or has **no permanent base** is unlikely to meet the definition of a children's home and will not be required to register with Ofsted.
- Supported accommodation is **not** Ofsted registered and is therefore deemed an unregulated setting.
(Annexe A provides Ofsted guidance on when a setting is supported accommodation and not care)

Where a service is providing care for a child under the age of 18 in a **static** placement, this service must be registered by Ofsted. Failure to do so results in the placement being unregistered and therefore illegal. It is the departments policy that we do not place in an unregistered setting.

Unregulated / unregistered fact sheet

Care / support being provided	Type of placement	If it should be regulated
CARE	+ MOBILE PLACEMENT	= UNREGULATED
CARE	+ STATIC PLACEMENT	= REGULATED (if the placement is not registered with Ofsted, CIW or CIS then this is an unregistered placement and is therefore illegal)
SUPPORT	+ STATIC PLACEMENT	= UNREGULATED

Exception to the rule:

1. If a child/young person is currently in a regulated placement and the provider is taking the child away for a 'holiday' the placement they go to for the 'holiday' does not need to be registered as their main placement is within a regulated placement. This type of arrangement can only be for up to 28 days.
2. Some mobile placements are regulated, this only applies to those that registered with Ofsted prior to May 2017 (example being Care Afloat).

CARE + MOBILE PLACEMENT

Examples of such placements are:

- Crisis placement on a barge (providers such as Exceptional Care offer this)
- Crisis placement in a tent (the department do not use this type of placement)

CARE + STATIC PLACEMENT

Examples of such placements are:

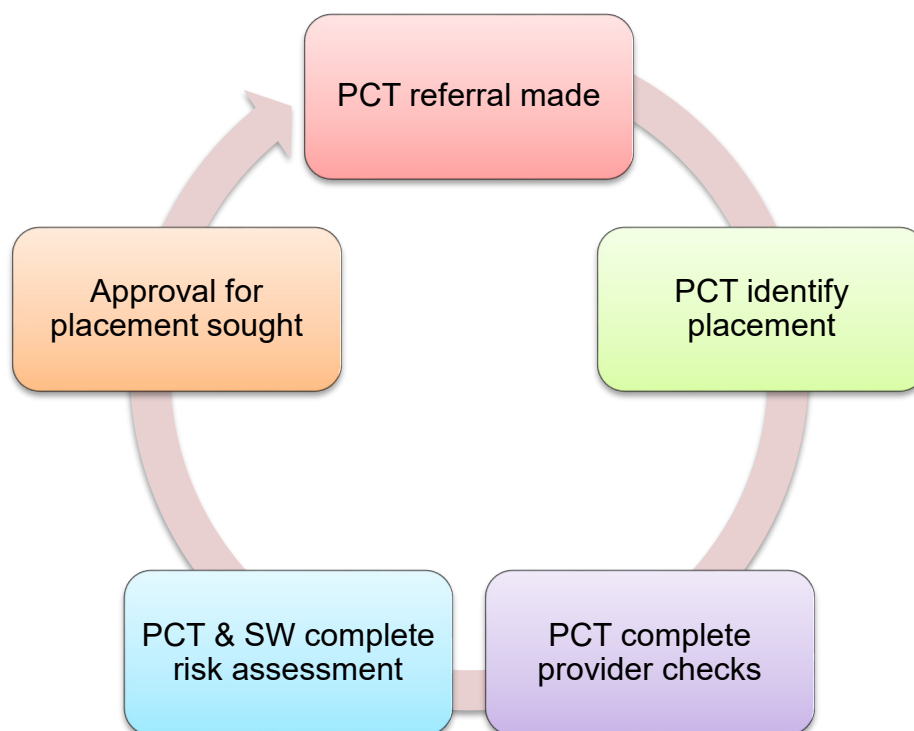
- Crisis placement in a home (providers such as Keys Child Care, Fair ways and New Forest Care)
- Residential short/long term placements
- Post 16 placement where care is being provided in line with Ofsted Annex A (providers such as Fair ways Athelstan)

SUPPORT + STATIC PLACEMENT

Examples of such placements are:

- Post 16 placement in a shared house with communal facilities (providers such as Step by Step, Two Saints, Alabare, Fair ways)
- Post 16 placement with a supported lodgings host (providers such as Step by Step)
- Post 16 placement in self contained flat with floating support (providers such as Key 2, Next Step Care Management)
- Post 16 placement in solo occupancy building with staff (providers such as Sportfit, Transform Care) – *staffing ratio of 1:1+ at all times would translate to care. YP must have free time if it is a supported accommodation placement*

3. Process at point of placement



PCT referral made

- If the type of placement requested meets the category of unregulated or crisis, the social worker will be asked to provide a clear rationale for such a placement in the referral alongside District Manager approval.

PCT identify placement

- PCT complete placement search based upon the referral.
- PCT will exhaust all regulated options in line with the care plan prior to considering an unregulated or crisis placement.
- Any unregulated or crisis placement offer received will be scrutinised by the PCT manager in line with Ofsted guidance as to what is unregulated and to avoid any use of unregistered service.

PCT complete provider checks

- Checks are made against the provider offering the placement, including:
 - Insurances
 - Gas & electric checks
 - Policies & procedures
 - Financial resilience check
 - Regulatory body rating (if applicable)
 - Consulting the host authority
- PCT maintain a log of business checks.

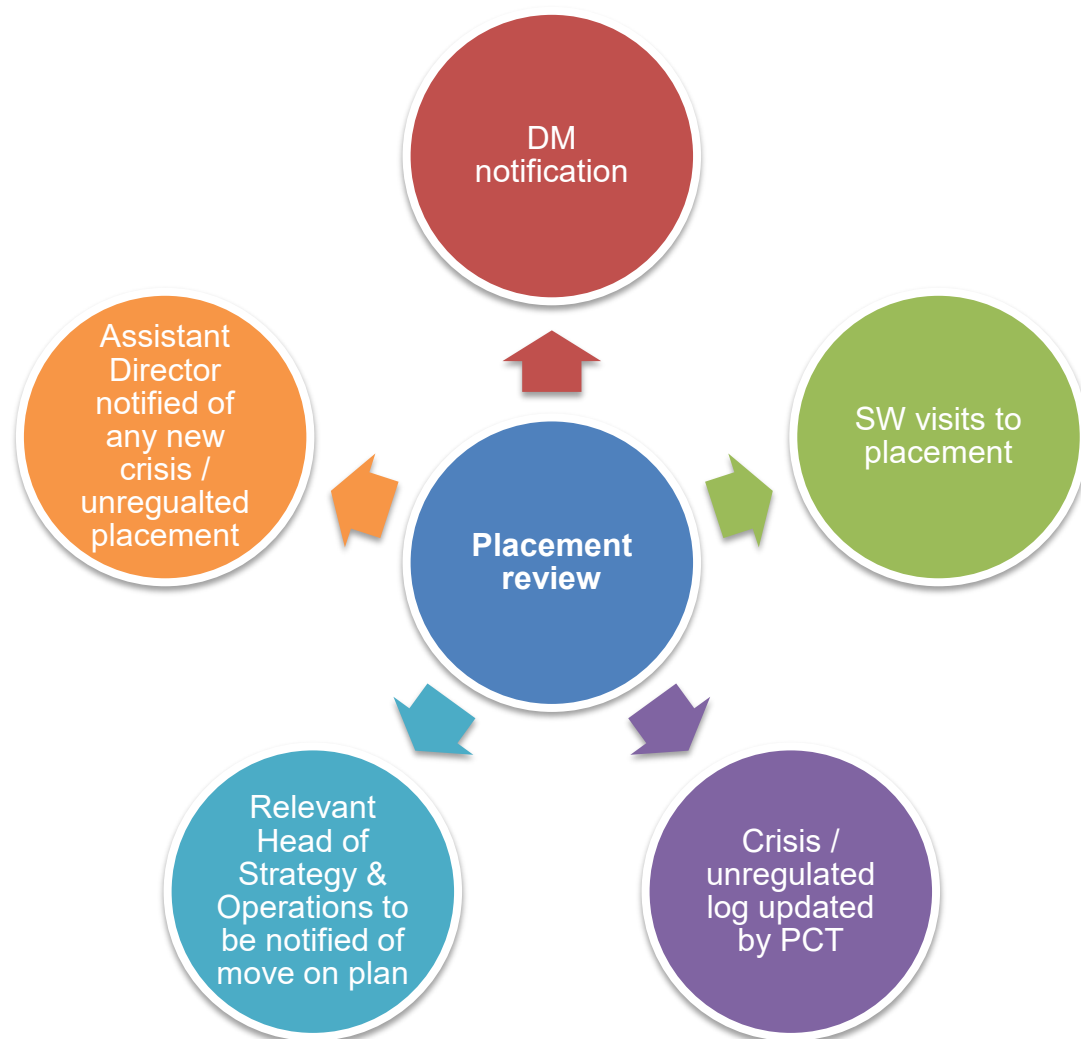
Risk assessment completed

- The PCT completes the risk assessment based on the provider checks and high level information on the child.
- The social worker completes the risk assessment outlining how the needs and risks of the young person will be managed, as well as the regular reviews of the placement.
- Link to the risk assessment: [CF unregulated placement risk assessment](#) (Annexe B)

Approval for placement sought

- Funding request sent to the relevant manager as per approvals process via PCT Team Manager.
- The risk assessment will be approved by the relevant CFMT member (Steph How, Sue Kocaman or Amber James) via PCT Team Manager.

4. Reviewing the placement



DM notification

- Monthly emails sent to the District Managers outlining all those in an unregulated and/or crisis placement as per log.

SW visits to placement

- As per the risk assessment, the social worker/ personal advisor will visit the placement within agreed timescales to review how it is meeting the needs and highlight any concerns if they arise.
- It is recommended that the social work visits will be more frequent in an unregulated or crisis setting either for the duration of the short dedicated timescale for the placement, or in the initial stages of the placement to be reviewed.

Crisis/unregulated log updated by PCT

- PCT maintain a log of those in a crisis and/or unregulated placement up until their 18th birthday, including details of move on plans: [Crisis & Unregulated Placement Tracking](#)

Relevant HOSO to be notified of move on plan

- The relevant Head of Strategy & Operations are to be notified of the move on plan one week in advance of a time limited placement ending by the PCT Team Manager.

Assistant Director (C&F) notified of new placements made

- The PCT manager will notify the Assistant Director (C&F) of any new placement made for a child under the age of 16 in an unregulated and/or crisis placement.

5. Reporting

The following reporting mechanisms are in place:

- The PCT will provide monthly statistics within the current activity report around unregulated and crisis placement.
- The PCT maintain a placement log of all those in crisis and unregulated placements which will be routinely updated.
- The HOSO will be updated with the move on plan for those in time limited placements one week prior to the placement ending by the PCT.
- The PCT Manager will notify the Assistant Director of any children being placed under the age of 16 in an unregulated and/or crisis placement.
- The Head of Service for Procurement, Commissioning and Placements will present a report on the use of unregulated and crisis placements quarterly to the Children & Families Management Team.
- The Head of Service for Procurement, Commissioning and Placements will update the Director of Children Services, Assistant Director and HOSO of monthly activity for such placements.

Annex A – Ofsted Supported Accommodation Check List

- This table sets out criteria to help identify whether the service being proposed or provided is ‘supported accommodation’.
- The table below sets out each criteria in the form of a question, and suggests whether a ‘yes’ or ‘no’ answer means care is provided, or supported accommodation.
- Where care is provided, this service meets the definition of a children’s home and will usually need to register with Ofsted.

Criteria	Yes?	No?
Can young people go out of the establishment without staff permission?	Supported accommodation	Care
Do young people have full control of their own finances?	Supported accommodation	Care
Do young people have control over what they wear and of the resources to buy clothes?	Supported accommodation	Care
Are young people in charge of meeting all of their health needs, including such things as arranging GP or specialist health care appointments? Are young people in full control of their medication?	Supported accommodation (note that young people may ask for advice and help on their health, but if the decisions rest with the young person, the establishment is not providing care)	Care
Does staff have any access to any medical records?	Care	Supported accommodation
Can young people choose to stay away overnight?	Supported accommodation (note that being expected to tell someone if they are going to be away overnight does not indicate providing care, but needing to ask someone’s permission does)	Care
Is there a sanctions police that goes beyond house rules and legal sanctions that would be imposed on any adult?	Care	Supported accommodation
If the establishment accommodates both adults and young people, do these under 18 have any different supervision, support, facilities or restrictions?	Care	Supported accommodation
Are there regularly significant periods of time when young people are on the premises with no direct staff supervision?	Supported accommodation	Care
Do staff have any responsibility for aftercare once a young person has left?	Care (note that some supported accommodation services will off some support to help young people get established in their	Supported accommodation

	next accommodation – this is not care)	
Criteria	Yes?	No?
Does the establishment’s literature promise the provision of care or relate to specific care support provided to all residents?	Care	Supported accommodation
Does the establishment provide or commission a specialist support service, which forms part of the main function of the establishment?	Care	Supported accommodation

Annex B – C&F Unregulated Placement Risk Assessment

Childrens and Families Unregulated Placement Risk Assessment

- 1.1 This risk assessment is to be used when consideration is given to place a young person in an unregulated placement.
- 1.2 This risk assessment evidences the quality assurance checks taken when placing with an unregulated provider.
- 1.3 An unregulated placement may be one of the following:
- Crisis outward bound activity placements
 - Post 16 placements for 16 & 17 year olds placed with non-contracted providers or providers on the high needs framework

C&F Unregulated Placement Risk Assessment			
Young Person Details			
ICS. No:		Name of YP:	
D.O.B:		Age:	Legal Status:
Provider Details (this section to be completed by PCT)			
Name of provider:			
Company Registration No:			
Location of placement:			
Type of placement and staffing level (e.g. 2:1 staffing, activity based placement etc.)		<i>Guidance</i> <i>PCT to state what type of placement it is (e.g. post 16, crisis time limited placement for 28 days, rural placement) and the staffing level (e.g. 2:1 staffing, 1:1 staffing)</i>	
Detail any regulatory body involved with the provider (e.g. CQC, CIW):			
Providers insurances:		The provider's insurances are in line with Hampshire County Council's framework for [delete as appropriate] Residential / Post 16.	
Providers policies & procedures:		The provider's policies & procedures have been reviewed and meet Hampshire County Council minimum standards.	
Has the provider evidenced a gas safety certificate dated within the last year?		Yes / No	
Has the provider confirmed that the wiring in the property has been checked within the last 5 years?		Yes / No	
Has the provider shared their Statement of Purpose?		Yes / No	
Outline the response from the host local authority (for out of area placements only)			
Financial stability risk score		/100	
Matching consideration (this section to be completed by social worker)			
Outline how the identified needs		<i>Guidance</i>	

of the young person can be met in this placement:	<i>Social worker to state what the needs of the young person are, such as health, education, self care skills. The social worker will then need to evidence how this will be supported in the current placement.</i>
Provide detail of how the risks to/from the young person will be managed within this placement.	<u>Guidance</u> <i>Social worker to state what the known risks are and how this will be managed in the proposed placement. (e.g. High level of absconding behaviour – Staffing ratio is 1:1 24/7 therefore any absconding will be known immediately. If this happens the provider will update police and social worker/out of hours when young person is missing.)</i>
Monitoring of the placement	
The allocated Social Worker and/or Personal Advisor will undertake statutory visits to the young person in the placement. As part of these visits they will review the support and accommodation offered to the young person.	
Ongoing review (this section to be completed by social worker)	
What is the frequency of Social Worker / Personal Advisor visits:	
When will a review of the young person's risk assessment take place:	
State what the move on plan for the young person is:	<u>Guidance</u> <i>This could be move on to contracted placement, move on to adult's, move back home</i>
What are the expected timescales for move on:	<u>Guidance</u> <i>This will either be lead by time restrictions (e.g. time limited placement, funding approved for set time period) or lead by review and the ongoing plan for the young person (e.g. within 6 months they will return home)</i>

Signed..... Date

Social Worker

Signed..... Date

Team Manager