



City of Westminster

# SAFE IN THE CITY:

## A REVIEW OF SUPPORTED ACCOMMODATION FOR 16-25 YEAR OLDS IN WESTMINSTER



JUNE 2015

# EXECUTIVE SUMMARY

The main focus of this report is around the safeguarding measures in place to protect young people between the ages of 16 and 25 in short-term supported accommodation provided by the local authority. We conclude that whilst our own safeguarding arrangements appear to be robust for our Care Leaver and 'Young People at Risk' cohorts, there had been a need, which has since been addressed, to review our own procedures in order to reflect the wider issues of exploitation of vulnerable young people in a Greater London context. We strongly believe that Westminster does not exist in isolation from the wider London context and there are serious concerns in regards to other London Boroughs in relation to the protection of young people. However, a summary of our local recommendations is below:

- Westminster should ensure that residual but identified safeguarding concerns are addressed in our local supported accommodation provision.
- Westminster should ensure that Children's Services and Housing continue to work closely together to ensure there are no potential gaps which affect service-users.
- We recommend that Westminster Children's Services ensure that we do not place non-resident young people at further risk due to our housing duty and assessment decisions.
- We recommend that the Police should work closely with stakeholders to ensure that young people in supported accommodation are safeguarded from perpetrators.
- Our Adult Safeguarding team should work more closely with Housing colleagues, due to the implementation of the Care Act.
- Our Integrated Gangs Unit should more regularly share information and intelligence with their colleagues working to house our young people.
- Our Housing team should be given some resource to evaluate outcomes of those young people who have been placed in Westminster's short-term supported accommodation, in order to continue to best safeguard our young people.

# FOREWARD



**Local authorities have both a legal and ethical duty to protect both the young people directly within the care of the Council and those who are not. Recent disturbing cases from Rotherham, Rochdale and Oxfordshire show that there can be systemic failure in local governance and processes which can mitigate against the protection of some of the most vulnerable young people in our society.**

However, systemic failure is not the standard across local government and a number of local authorities, such as Westminster, have many robust procedures and systems in place to safeguard young people from exploitation. Even in places where there are repeated internal assurances that such exploitation could never happen, there needs to be an independent eye to stress-test what is reported against what is actually happening. The following report is intended to document an exploration of procedures and processes in place to safeguard young people between the ages of 16 and 25, who are living semi-independently in short-term accommodation. We provide a number of recommendations intended to improve the operation of, what we have found to be, already good practice within both the Council and our partners. However Westminster does not exist in isolation from the wider London context and there are serious concerns in regards to other London Boroughs in relation to the protection of young people (16- 25).

This report is the result of research collated as part of two recent investigations within the Policy & Scrutiny function at Westminster; firstly the Department of Health supported **Violence against Sex Workers** project in 2013 and secondly, in 2014, the examination of high-risk behaviour relating to **party drugs** in the City. Both of these policy reviews touched on potential safeguarding concerns in relation to young people in Westminster. As a result of hearing some concerning evidence about other London Boroughs from our Londonwide stakeholders, we considered that a type of 'branch policy review' could provide some assurance around safeguarding young people in Westminster.

In November 2013, we convened a roundtable discussion with managers of young people's hostel accommodation in Westminster. Without a set agenda, we invited management teams to share any concerns around safeguarding the young people in their care. Arising from this roundtable discussion, a series of interviews, intended to explore concerns raised, were conducted across the Council and with external organisations in London. This report shows the outcome of this investigation and presents a series of recommendations to address the highlighted concerns.

I would like to express my sincere thanks to all internal officers and external agencies (Barnardo's, Terrence Higgins Trust, the Children's Commissioner, Policy Exchange, Supported Housing Providers and Children's Services officers) who have helped us to piece together this report. I would especially like to thank Westminster's 'Supporting People' Housing Commissioner, who has given her time and experience to us in order to explore this area in depth.

**Cllr Ian Rowley,  
Project Chairman**



# CONTENTS

<b>1 BACKGROUND</b>	<b>5</b>
<b>2 SHORT-TERM SUPPORTED ACCOMMODATION</b>	<b>8</b>
Immediate outcomes as a result of this review	11
Activity since the review	12
Partnership arrangements	14
Contract monitoring	15
• New policies and procedures	15
Responsibilities of other local authorities	18
Vulnerable Adults - A multi-departmental approach	18
• Policing in Westminster	18
• Adult Safeguarding	19
• The integrated Gangs unit (IGU)	20
<b>3 WHAT HAPPENS AFTER SUPPORTED ACCOMMODATION?</b>	<b>21</b>
• Responsibilities of Westminster for 'Care Leavers' placed outside of the authority	22
• What is the 'Semi-Independent Living' Commissioning Strategy?	22
• Responsibilities of Westminster for non-Care Leavers leaving supported accommodation	23
<b>4 RECOMMENDATIONS</b>	<b>25</b>

## 1. BACKGROUND

**1.1** Central Government has made the issue of sexual exploitation a policy priority, with the lead transferred from the Department for Education to the Home Office as the scope of the work has extended to cover both **child and adult sexual exploitation**. Nine workstreams have been established covering all aspects of **prevention, identification and intervention**. Most of this work is still in development and further recommendations and revised guidance continues to be published.

**1.2** Professor Alexis Jay's Independent Inquiry into Child Sexual Exploitation in Rotherham was commissioned in October 2013 and published on 26 August 2014. Covering the periods of 1997 to 2013, it looked at how Rotherham's Children's Services dealt with child sexual exploitation cases. The report found evidence of sexual exploitation of at least 1,400 children in Rotherham in this period. Two House of Commons Select Committees have published reports on sexual exploitation, based on events in Rotherham and the Jay report into those events. The Home Affairs Committee published a follow up to its 2013 report on the response to localised grooming, and the Communities and Local Government Committee published the report of its inquiry into CSE in Rotherham. Both reports raise issues of continuing concern to local authorities and their partners as they make up ground in formulating a more effective response to child sexual exploitation.

**1.3** The 2013 Home Affairs Committee report on the response to localised grooming which reviewed the way in which prosecutions of child grooming gangs in Rotherham, Rochdale and Oxford brought sexual exploitation to public and political attention, and described child sexual exploitation as a 'large scale, nationwide problem' which evidence suggested was increasing. That report recommended that all Local Safeguarding Children Boards (LSCBs) should nominate a **(1) CSE coordinator** and **(2) publish an annual report on local CSE work**, and that **(3) LSCBs should work together to develop and collect data in a standard format** in order to facilitate comparison and inspection across areas. It also recommended that LSCBs should be required to set up a **(4) multi-agency safeguarding hub (MASH)**, comprising representatives of social care,

local police, health professionals, education, youth offending teams and voluntary organisations.

**1.4** Given the serious failings highlighted by the Jay report, the Secretary of State for Communities and Local Government, Eric Pickles, appointed **Louise Casey CB** on the 10 September 2014 to carry out an inspection of Rotherham in relation to the exercise of its functions on governance, children and young people and taxi and private hire licensing. Louise Casey's report was published on 4 February 2015 and after careful consideration, the Secretary of State made a statement in the House of Commons in which he confirmed that he was exercising his powers of direct intervention in relation to Rotherham.

### Westminster City Council

**1.5** Whilst there could have been systematic failures across the local government landscape, the problems identified in Rotherham will not be common across the sector. In terms of current practice in Westminster, for example, our safeguarding framework for protecting children and young people from sexual exploitation is already well developed, and has been further revised and updated in London with the pan-London child sexual exploitation protocol recently approved by the London Safeguarding Children Board. Our own Local Safeguarding Children's Board also made child sexual exploitation a priority for 2014 and is driving improvements in safeguarding by all agencies through a 'LSCB Sub-group' Strategy and Action Plan.

**1.6** It is important to state that our own investigation into supported accommodation is only a slice of Council activity with young people. However, we initially raised concerns in this area in November 2013, after meeting with hostel managers about the potential need to strengthen safeguarding arrangements specifically in relation to the hostels where potentially vulnerable young people were placed. The places were funded by Housing's 'Supporting People' grant. It was concluded that whilst safeguarding arrangements for our 'Looked after Children' and Care Leavers appeared to be robust, there was a need to review procedures to reflect the wider issues of exploitation of vulnerable young people in a broader London context. This



## The 'Supporting People' programme

The Supporting People programme was launched in 2003 as a £1.8 billion ring fenced grant to local authorities intended to fund services to help vulnerable people live independently.

In 2014 / 2015, this grant now stands at £1.59 billion and is no longer ring-fenced, but still provides a high level of vital provision of support services to vulnerable people.

was in no way related to the officers involved in the commissioning of services; whose work to safeguard clients in supported accommodation was found to be exceptional. However evidence received from SWiSH (Sex Workers into Sexual Health) and Terrence Higgins Trust during the research projects into Violence against Sex Workers in 2013 and in 2014, the examination of the usage of party drugs, suggested that exploitation of young people in supported accommodation was thought to be systematically occurring in other London Boroughs.

### 1.7 What is 'supported housing' and what are housing-related support services?

There is no statutory definition of supported housing. It can take many forms such as refuges for women escaping domestic violence, housing with warden support for the elderly, and hostels for recovering addicts. Fundamentally, people living in supported housing receive "housing related supported services" in order to enable them to live independently. Examples of these support services include:

- the provision of visiting support services to older people in their own homes;
- warden services provided within sheltered housing schemes;
- help for people leaving institutions (e.g. prison) or who have been homeless to set up home;
- assistance for young care leavers to prepare for greater independence through training in basic skills such as cooking and hygiene;
- provision of on-going support for people adjusting to independent living, if moving into their own home after living within a support scheme.

**1.8** These last two bullet points are the focus of this report. Housing related support services make an immense and cost-effective contribution to improving the quality of lives of vulnerable people, and to the development of community wellbeing. Young people, often with complex problems, can find it very hard to hold down a tenancy or stay in one place long enough to get training, counselling, and other assistance in stabilising their lives. 'Supporting People' provides the means of enabling them to settle in a new home, and learn basic life skills that other people take for granted like how to pay rent, shop for food, organise going to regular training and so on. This stable support enables them to take the necessary steps forward towards independence and stability.

**1.9** However, exploitation can often follow the vulnerable because of the opportunities this can afford to potential perpetrators. Any group of vulnerable young people in a supported context could pose risks by sheer virtue of its existence. Evidence received suggested that supported accommodation in other London Boroughs had been expressly targeted by perpetrators of sexual exploitation. <sup>1</sup> In reviewing our own arrangements, we look to provide assurance that the same could not and will not happen in Westminster. In some respects young adults may be at more risk when discharged into private rented accommodation outside of Westminster, due to the lack of oversight from other London Boroughs. However, one of the serious concerns in Rotherham and Rochdale was that both Councils were 'inexcusably slow to realise that the widespread, organised sexual abuse of children, many of them [directly] in the care of the local authority, was taking place on their doorstep. This was due in large part to a woeful lack of professional curiosity or indifference. (Home Affairs Committee 2013)'

<sup>1</sup> SWiSH / THT (2013) Interview with staff

## 2. SHORT-TERM SUPPORTED ACCOMMODATION

**2.1** Westminster Housing commissions around 140 units of supported accommodation managed by four different providers. Commissioners find that this level of provision is sufficient for current demand. This accommodation is for young people from the age of 16 up to the age of 24 and it is delivered in both hostel and self-contained forms. The types of accommodation provided in Westminster are outlined in the table below and a list of accommodation is provided in the appendix.

### Hostel Accommodation

Hostel accommodation is short-term accommodation (< six months). There are rules to follow at the hostel and workers are based at the hostel 24 hours a day.

### Shared Supported Accommodation

Typically this would be for 3, 4 or 5 people. Each person usually has their own bedroom. There could be an established and funded level of staff support, from visiting to 24-hour presence on site.

### Foyer Accommodation

Foyer accommodation is usually more long-term (> six months). A foyer may look like a furnished bedsit or flat. There are some rules to follow, but these are usually more relaxed than in hostels. The workers are based at the foyer 24 hours a day. The main focus is to ensure young people are linked into employment and training opportunities.

### Self-Contained Accommodation

Each tenant has his or her own bedroom, kitchen and bathroom, typically in a furnished or part-furnished flat. Tenants are responsible for paying their own utility bills.

**2.2** Services are prioritised for Westminster's own care leavers and approximately 30% of the total number of units are being used by young people who had been 'Looked after Children' in Westminster. The remaining places (70%) are used to provide accommodation for young people at risk of homelessness and considered vulnerable.

## Supported Young People

### Care Leavers (c.30%)

These young people have been within Westminster's Looked After Children cohort and are taking steps to independent living in supported accommodation.

### 'Young People at Risk' (c.70%)

These young people may have been made homeless in Westminster but do not come from Westminster's Looked After Children cohort, nor necessarily have similar support or support needs.

**2.3** There is a responsibility on contracted service providers to demonstrate their commitment to safeguarding and promoting the welfare of vulnerable adults and children. All housing-related support services under the 'Supporting People' Programme are required to complete the Quality Assessment Framework (QAF) which describes the set of standards and responsibilities of services working with vulnerable groups to respond effectively to allegations of abuse. These include:-

- Ensuring that robust policies and procedures for safeguarding and protecting adults and children at risk of harm are updated and comply with current legislation and government guidance.
- Staff understand their policies / procedures and that their practice both safeguards adults and children.
- Raising awareness of abuse or exploitation and how to report it.
- Supporting victims of abuse or exploitation.
- That the service is committed to participating in a multi-agency approach to safeguarding adults and children who may be at risk of harm or neglect.

**2.4** An internal review of the safeguarding arrangements for those aged 16 and 17 years olds who are looked after / care leavers placed in hostels concluded that there was not any systemic weakness in the safeguarding framework for

clients placed in hostels in Westminster. However a roundtable discussion with hostel and short-term accommodation managers was convened to discover whether there were any potential issues where agencies, such as the local authority, could improve their working. A summary of the discussion is provided in the table below.

### Supported Accommodation Roundtable (Providers) – 30th September 2013

**Attendees: Centrepont, De Paul UK, Cardinal Hume Marylebone Project and One Housing Group**

The discussion concluded that young people were safe in Westminster short-term accommodation but there were concerns that Westminster City Council and the Borough Policing could improve in two areas:

**1)** When incidents occurred in hostels or short-term accommodation, the reporting to the Council followed the incident reporting procedures, however it was reported that staff had concerns about any relevant follow up by Children's Services.

Whilst it was reported that information-sharing was good between the Council's housing department and providers, there was a need to share information more broadly across the Council and partners (i.e. the Integrated Gangs Unit, the Police and Children's Services)

However, soon after the meeting, officers met to consider a number of ways of improving the reporting of these incidents. For example, there are existing structures in place for providers to share information but officers were considering the best approach to ensure that concerns raised with Children's Services were being followed up. It was agreed that the accommodation officer and Children's Services Deputy Service Manager, based in the Leaving Care Team, would lead on these arrangements.

The creation of a specific multi agency panel to encourage effective sharing of information and to build up a picture of what is taken place across services in relation to these incidents was established in January 2014, and the first meeting of a Multi-Agency Sexual Exploitation (MASE) panel took place. Jointly chaired by Police and the Council, the panel now provides oversight and tracking of the casework done with all children identified as being sexually exploited, and enables improved analysis and intelligence sharing of patterns of exploitation and its changing profile in Westminster.

**2)** Hostel and short-term accommodation providers also concluded that whilst Westminster Police do intervene appropriately and effectively in many incidents, that the response across services was inconsistent. Westminster Police should adopt a stronger and consistent approach to reflect the context of the clients and the potential vulnerability to exploitation.

A further discussion was held with hostel residents to discuss what their concerns were within supported accommodation. A summary of the discussion is below:

### Supported Accommodation Roundtable (Young People) – 26th November 2014

Young people at a Westminster hostel seemed informed of the opportunities to raise awareness to support staff at both the Council and the hostel itself. When asked a number of safeguarding questions, the young people were very aware of what was considered safe and unsafe behaviour. The young people in the hostel were mostly concerned about specific issues which they felt made them unsafe and potentially at-risk:

#### Staffing

The young people we spoke with considered that staff turnover in hostels was a potential issue if they were not fully trained on all aspects of the safety of residents; this was especially the case where there were agency staff or short-term staff who were not trained in the policies of the accommodation. The Quality Assessment Framework for Supported Housing Services requires safeguarding knowledge and understanding to be assessed as part of recruitment process and included within induction, and it was not reported to be the case in this situation.

#### Placements

The young people also felt that professionals needed to be more vigilant about placements, particularly if they do not feel safe. This was reported to happen when some young people were placed in shared accommodation. Children's Services have reported that they are keen to explore the possibility of supported accommodation provision which is dedicated for Care Leavers with Westminster Housing commissioning colleagues. Care Leavers often have different needs and levels of risk than other vulnerable young adults in supported accommodation. Children's Services report that dedicated provision will enable Care Leavers to feel safer by sharing accommodation with others who have similar background and experiences. The implications of this approach require discussion and agreement with Housing Commissioners and a recommendation is included below in relation to this.

Recognising that since these findings a great deal of activity has been undertaken we would make the following recommendations to Housing and Children's Services:

**Recommendation:** We consider that Housing and Children's Safeguarding officers need to review with hostel managers and Children's Services staff any outstanding training needs in respect of sexual exploitation. This should continue to be done on a rolling basis to ensure needs are monitored.

**Recommendation:** We would also recommend that the 'Supporting People' Housing Commissioner continue to ensure that hostel staff on agency or short-term contracts are sufficiently trained for their role in relation to safeguarding. In tandem, we recommend that staff turnover should continue to be monitored closely to assure against safeguarding issues.

#### Immediate outcomes as a result of this review

**2.5** As a direct result of these roundtable discussions during the course of the scrutiny review, a number of actions were directly taken up by officers to improve the service in accordance with the findings. We found that officer action was suitably reflective of the issues identified and looked to improve the services according to the evidence provided.

- A. All service providers were assessed, and were found to be achieving a 'Good' or 'Excellent' score against the Safeguarding Core Objectives within the Quality Assessment Framework.
- B. Consultations were held with young people and it was confirmed that there was a good level of awareness around safeguarding and health and safety. It was positive that young people reported that they felt 'safe' in the accommodation provided.
- C. Case conferences became standard to identify any issues around safeguarding. This offers an opportunity for providers and Children's Services to discuss concerns in relation to young people.
- D. The 'Supporting People' Housing Commissioner developed an improved relationship with the Westminster Police and each hostel has a link to neighbourhood policing teams. Some Safer Neighbourhood Teams are now providing a visual presence to the hostels.

- E. There has been Child Protection training delivered to the Young Person's Housing Forum.
- F. To standardise the information presented to Children's Services in relation to Child Protection or concerns relating to sexual exploitation, a standard template has been produced for hostel staff.
- G. Information sharing protocols have been developed between the accommodation providers and Children's Services.
- H. There has been sexual exploitation training held jointly for Children's Services, hostel staff and other frontline staff (e.g. substance misuse workers.)

#### Activity since the review

**2.6** Over the last year there has also been a significant amount of activity undertaken to test the above quality assurance and to improve provision. These activities include:

- Workshops held on safeguarding, particularly in respect of safeguarding those aged eighteen and over, at the Young Persons Housing Forum.
- Staff have continued to attend the Local Safeguarding Children's Board training
- Training needs assessments have conducted across hostels.
- Healthy relationships sessions, which include information about sexual exploitation, have been held to promote awareness.
- A Child Protection Advisor briefed the Young Person's Housing Forum.
- Literature across services has been redrafted to reflect recent change.
- There has been a 'Best Practice' guide produced for hostel staff, in partnership with Children's Services

**2.7** Some of the young people who are cared for under the 'Supporting People' umbrella are extremely vulnerable, including some specific vulnerabilities relating to sexual exploitation. Officers report that these are addressed through:

- Well established links between Westminster's 'Looked After Children' officers, the 'Leaving Care'



team and each hostel. Housing and Children's Services are continuing to build the confidence of hostel managers in respect of safeguarding, in particular for those over 18, and are working to ensure the right level of support is in place to achieve this.

- Co-ordination between young people's **care** and **pathway** plans, and the hostel **placement** plans;
- Children's Services managers are engaged in regular meetings with hostel managers convened by the Housing Commissioner;
- The role of a lead **Child Protection Advisor** with a lead responsibility in respect of Child Sexual Exploitation;
- There are links with the Integrated Gangs Unit and the specialist role of their Independent Sexual Violence Advocate;
- Local Safeguarding Children's Board training is undertaken by hostel staff;
- Officers report that there are links with Adult safeguarding and MARAC;
- Officers ensure that hostels have a commitment to safeguarding the welfare of adults and children using or visiting the services, which includes ensuring that robust policies and procedures are in place and that staff are aware of these and promote understanding of abuse. All staff are appropriately trained and continue to work in multi-agency approach to safeguard vulnerable adults and children;
- There has been bespoke Sexual Exploitation training delivered to the hostel managers;
- Safeguarding Forums are held by hostel providers to review incidents and lessons learnt with some input from young people where appropriate.
- The 'Move On' Review Panel is held monthly with representation from supported housing providers, Tri-Borough Placements and a Children's Services 'Service Manager' to review the placement needs of all young people. There is a slot on the aAgenda to facilitate the sharing of information between services to identify sexual exploitation concerns and any emerging patterns, to ensure appropriate action is taken to safeguard young people.

### Partnership arrangements

**2.8** During the course of the review it was reported that there were good partnership arrangements between Westminster's 'Looked after Children', 'Leaving Care' Team and each hostel. It was also reported that there is good co-ordination between young people's care plans and pathway plans, and the hostel placement plans. There are also strong links with the Adult's Safeguarding Team and Children Services Managers engage in regular meetings with hostel managers convened by the Housing Commissioner, mostly when safeguarding is an agenda item. There are strong links with the Integrated Gangs Unit (explored below) and the specialist role of their Independent Sexual Violence Advocate who provides one to one support to young people. The wider strategic Young Persons Housing Forum has representation from the Children's Services Managers, the Youth Offending Team, the Child and Adolescent Mental Health Service (CAMHS) and substance misuse teams. Safeguarding is a standard agenda item at these meetings. There is also representation from Housing on the Local Safeguarding Children's Board. However, one area where partnership working was unclear was in 'Locality Services' and what role they play in safeguarding these young people.

### Contract Monitoring

**2.9** We have been assured that commissioners maintain a robust and rigorous quality assurance framework in respect of the 'Supporting People' hostel provision and work has intensified in 2014. The monitoring includes:

- **Ensuring that Hostel Managers comply with an incident reporting process** which covers a systematic approach to risk assessing all safeguarding concerns. All incidents should be reported to the Housing Commissioner, Children Services and Adult Safeguarding for those over the age of 18.
- **Regular scheme visits** are conducted to each hostel to monitor performance which includes the review of policies and procedures and client files to review safeguarding arrangements. Hostels have recently been visited and young people interviewed by the Cabinet Member, a care leaver who is a member of the Corporate Parenting Board, the Director of Family Services, as well as the Head of

Service and Service Manager for 'Looked after Children' and Care Leavers. These quality assurance visits have confirmed that the hostels each provide a wide-ranging offer of support to young people addressing the range of needs including education and training, personal and healthy relationships, health issues and independent living skills.

In addition, consultations are held with young people in hostels to gain feedback on safeguarding arrangements.

- **An annual Safeguarding Action** Plan has been developed to further strengthen practice within this area which also includes service user consultation.

### New policies and procedures

**2.10** In January 2014 the first meeting of a Multi-Agency Sexual Exploitation (MASE) Panel took place. Jointly chaired by Police and Children's Services, the Panel provides oversight and tracking of the casework done with all children identified as being sexually exploited, and enables improved analysis and intelligence sharing of patterns of exploitation and its changing profile in Westminster. The MASE is a **monthly risk management meeting** led by Children's Services. The core group for this meeting includes representatives from the Youth Offending Team, Westminster Gangs Unit and the 'Looked After Children' / 'Leaving Care' Service Manager who also co-chairs the meeting. During the meeting all case known or associates of young people known to the LAC / Leaving care service who are or known to be involved gangs, serious crime, at risk of sexual exploitation or have been subjected to sexual exploitation or on the edge of crime are discussed, action plans developed, reviewed and monitored.

**2.11** There is also a **Transition Panel** which is a multi-disciplinary panel involving CAMHS Services, Education, Children's Placements Team, the 'Supporting People' Housing Commissioner, substance misuse services and LAC and Leaving Care Services. This is also chaired by the LAC and LC Service Manager. This panel discusses Westminster young people who are looked after or are Care Leavers between the ages of 14 years old to 25 years. The panel reviews the needs and risk of the above young people within the service. The

Panel also makes suggestions regarding appropriate additional services to meet the young people's needs; these include the young person's educational, accommodation and therapeutic needs.

**2.12** A Children's Services Manager now attends the 'Supporting People' quarterly contract monitoring meeting, to identify safeguarding issues, be able to make management decisions and take responsibility for feeding back any particular issues. The diagrams below illustrate structures in place to safeguard young people in supported housing.

### New structures:

#### MULTI-AGENCY SEXUAL EXPLOITATION PANEL

##### What does this do?

Monthly risk management meeting based on individual cases. This panel looks at individual cases whilst the existing structures of contract management and the Young Person Housing Forum.

**A Children's Services manager now attends this forum**

### Existing structures:

#### 'SUPPORTING PEOPLE' QUARTERLY CONTRACT PERFORMANCE MANAGEMENT MEETING

##### What does this group do?

The group reviews the performance of our provision.

#### TRANSITION PANEL

##### What does this group do?

This group reviews the needs and risks facing looked after children and those leaving care.

#### YOUNG PERSON HOUSING FORUM

##### What does this group do?

The aim of the forum is to improve the commissioning of housing related support services for young people.

## Recommendations

**Recommendation:** We recommend that the changes in process and procedure that came about as a result of this review (e.g. MASE) continue to be supported by senior management at Westminster City Council. Staff should be allowed to maintain adequate resource to ensure the continuation of the models outlined in this report. We consider that as a minimum, the MASE should include former 'Looked After Children' and on a case-by-case basis those who were not in the care of Westminster.

**Recommendation:** We recommend that the 'Supporting People' Housing Commissioner is invited to attend to the MASE when relevant.

**Recommendation:** We recommend that the **Child Protection Advisor** and **Adult Safeguarding Lead** (where appropriate) attends the Young Person's Housing Forum to provide briefings on relevant legislative changes and updates to the Forum, in order to increase awareness about any emerging patterns to ensure appropriate action is taken.

**Recommendation:** We recommend that Housing Commissioners continue to ensure that safeguarding and sharing of information continues to take place across the various fora and that these arrangements are reviewed in partnership with key stakeholders to show the effectiveness of these arrangements.

**Recommendation:** Children's Services have reported that they are keen to explore the possibility of supported accommodation provision which is dedicated for Care Leavers with Westminster Housing commissioning colleagues, we recommend that the implications of this are fully understood and discussed with a range of stakeholders.

**Recommendation:** We recommend that the **locality teams** in Westminster consider their role(s) in relation to safeguarding young people in supported accommodation

## Responsibilities of other local authorities

**2.13** Officers reported to us that there was occasional agreement to placements by other local authorities of 'Looked after Children' or 'Care Leavers' in Westminster. This was carefully managed by the 'Supporting People' Housing Commissioning

Manager and the Children's Placements Team and these placements are few in number. All safeguarding incidents were reported to the Tri-Borough placements service. However concerns were reported about the process and safeguarding management of 'Looked After Children' from other local authorities presenting directly to supported housing providers without the agreement of Tri-borough placements service.

**Recommendation:** We note that 'Looked after Children' from another local authority who approach our supported housing directly, and are unable to gain access, may be at risk. As such we recommend that the advice and assistance offered by the duty and assessment team is sufficient and does not place these young people at further risk. We further recommend that Children's Services monitor such cases closely.

## Vulnerable Adults – A multi-departmental approach

**2.14** Conversations amongst hostel managers, the 'Supporting People' Housing Commissioner, Community Protection, Police and Adult Safeguarding have confirmed that there is definitely scope to strengthen the multi-agency safeguarding arrangements for vulnerable young adults placed in hostels given that Westminster City Council has responsibility for these young adults aged between 18 and 25, irrespective of whether the young person has been through our care system. The following assesses how cross-departmental and multi-agency work could be improved:

### Policing in Westminster

**2.15** Hostel management and the Terrence Higgins Trust raised issues of the Police response and processes in relation to incidents within hostels and supported accommodation. This response was deemed to be **'incident driven'** and did not take into account the context of the hostels and the potential vulnerability of its residents to exploitation.

**2.16** We held a meeting with Assistant Commissioner Mark Rowley, who holds the brief for the area within the Metropolitan Police, which resulted in a statement that regular patrols and relationships would be established with hostels in Westminster. Officers in the Council reported that patrols already happen, but the Police had agreed to increase visual presence

around the supported housing schemes. There was also recognition that London Boroughs had a critical role in protection and ensuring police support where needed.

**2.17** Police have existing links with each hostel through their respective Safer Neighbourhood Teams, with a named officer who should be working proactively with each hostel. This is in parallel with the local Community Protection Officer who maintains a similar link. The Police have agreed to improve the partnerships arrangements with hostels and separate meetings are being held with each Safer Neighbourhood Team. Police have agreed to review the effectiveness of the current arrangements and whether there is a need to create a single point of contact to hold all intelligence regarding safeguarding across the hostels. Officers were also planning to explore the potential of the **MASE** to fulfil this role. Although developed specifically in order to address children's safeguarding, there are compelling arguments for **MASE** to hold responsibility for those young adults who fall in leaving care and gang cohorts, and it may be possible to extend the role to all vulnerable adults in Westminster's hostels.

**2.18** Unfortunately there are no clear procedures or information-sharing protocols for young people aged 18 years and above who are vulnerable or frequently abscond from their placements. This may become more prevalent with the implementation of the Care Act in April 2015 with the new safeguarding procedures for vulnerable adults becoming more systematised and consistent across departments. There is a need to have such protocols which could enable the police to share intelligence informing Westminster of the possible risk within the community prior to placing young people and reducing the risks young people may be exposed to.

**Recommendation:** We believe that the Police should clarify the best model for assessing and analysing intelligence in respect of sexual exploitation, either through the new MASE or otherwise.

**Recommendation:** We consider that the Police should work with Westminster City Council in respect to more formalised information-sharing protocols, especially in relation to young people between the ages of 16 and 25.

## Adult Safeguarding

**2.19** It is reported that Adult Safeguarding officers are engaged in strengthening safeguarding arrangements in line with other developments that are strengthening the links between Adult and Children's Safeguarding. A new Complex Needs Task & Finish Group has been initiated by Westminster's Violence Against Women and Girls Board on the particular needs of women who have complex combinations of needs, including domestic violence, sexual exploitation, mental illness, substance misuse and trafficking. The Safeguarding Adults 'Train the Trainers' programme has had a good take up by Young Person's Hostels which feeds into the Adult Safeguarding Community Engagement workstream.

**2.20** Housing Commissioning is working with Adult Safeguarding in relation to the new Care Act 2014 and the change that that this legislation will bring about. Particularly given the focus in the Care Act on the transition client group under scrutiny in this report.

**Recommendation:** We believe that Adult Safeguarding should continue to work closely with the 'Supporting People' Housing Commissioner, given that the implementation of the Care Act began in April 2015. Whilst there is already a draft joint 'Local Safeguarding Children's Board (LSCB)' and 'Safeguarding Adults Board' protocol in which one of the areas is a pathway for joint working arrangements, the Chairmen of our local Boards should have relevant 'link meetings' to provide assurance that the transition group is being considered by both Boards.

## The Integrated Gangs Unit (IGU)

**2.21** Officers within Westminster's Integrated Gangs Unit (IGU) report that they have a number of ways in which they interact with young people in supported accommodation. Currently, on receipt of names from the hostels of people wishing to be placed, the IGU will check these against known gangs and gang-affiliates from the Westminster and Metropolitan Police lists and inform them if there are associations are evident. This would include any gang-related sexual exploitation known to officers.

**2.22** Following a meeting at the end of last year with the 'Supporting People' Housing Commissioner, the IGU are looking at refreshing this process to enable officers to be aware of young people at an



earlier stage prior to being considered for a hostel placement to consider suitability. A process chart is due to be shared shortly.

**2.23** In general, the Integrated Gangs Unit undertake training with hostel staff and client groups as and when, depending on the need, but officers report that this is fairly regularly. Officers at the IGU are also part of wider training organised by the Housing Commissioner at provider events. The IGU liaise on specific individuals and accept case work and enforcement from hostels where the individual meets the thresholds required.

**2.24** The IGU are also aware of those leaving prison or custody through the Police and the Probation service. Using this information and working with other agencies looking at housing, associations, exclusions and support, the IGU minimise risk when individuals either re-enter Westminster or are placed outside, as officers regularly share information with other London Boroughs.

**2.25** The IGU also meet with Westminster's 'Looked after Children' team and regularly assess those young people who are placed outside Westminster. Officers might work for a short period with young people placed outside Westminster while a settling in period happens if the placement isn't too far away and/or the risk or need requires it. Officers meet regularly with the LAC team (monthly) to discuss specific individuals and share information and intelligence in order to appropriately plan or intervene to reduce risks.

## 3. WHAT HAPPENS AFTER SUPPORTED ACCOMMODATION?

**3.1** By default, supported accommodation is temporary. The legislation and funding is designed to give young people greater independence and help them adjust to independent living. Young people will therefore, at some point, leave supported accommodation and Westminster must discharge its housing duty in respect of these young people. Due to housing pressure in the City of Westminster, this may be into the private rented sector outside of the Borough. Westminster, however, will still be responsible for a duty of care for care leavers until the young person concerned reaches the age of 25.<sup>2</sup>

**3.2** The discharge into semi- or fully independent accommodation is therefore a significant stage in terms of safeguarding. Ensuring the welfare and security of these young people is made more difficult due to the necessity for geographic dispersal due to Westminster's highly unique housing market. At least with care leavers placed out of Borough, there are provisions to ensure that social workers remain in contact with these young people. However there are inherent risks in placing any young people out of Borough and thus out of the local knowledge and intelligence base. Chief amongst these concerns are the following:

- The risks associated with discharging Westminster's housing duty into a London Borough with unsatisfactory local standards (e.g. evidence provided to us from two external organisations independently suggested that local authorities would refuse to place any young people in a particular London Borough).
- The risks associated with Borough-based Policing in London which may not pick up on the safeguarding needs of young people exiting supported accommodation.
- The risks from an absence of gang intelligence in other London Boroughs where an IGU may not be established or is moribund.

### Responsibilities of Westminster for 'Care Leavers' placed outside of the authority

**3.4** In these circumstances, the Children's Services department is responsible for arranging **out-of-borough supported accommodation** (also known as **Semi-Independent Living**) placements, which are commissioned by the Children's Services Placements Team. The implementation of the **Children's Services 'Semi-Independent Living' (SIL) Commissioning Strategy** builds on the existing arrangements to ensure young people leaving care placed outside of Westminster, but under the responsibility of the authority, receive safe and high quality services.

### What is the 'Semi-Independent Living' Commissioning Strategy?

**3.5** Following its own review of supported accommodation services in 2014, the Children's Service department developed its Semi-Independent Living (SIL) Commissioning Strategy for young people in care aged sixteen and over and Care Leavers for Westminster, Kensington and Chelsea and Hammersmith and Fulham.

**3.6** The Commissioning Strategy sets out a shared vision for supported accommodation for care leavers, based on four 'Pillars of Parenting': Personalisation; Outcomes; Collaboration; and Community. The strategic aim is that service providers will share the parenting responsibility with the councils, providing and acting for young people in the way that a good parent would act for their own child. The Commissioning Strategy also sets out the following recommendations to improve services and ensure robust safeguarding measures are maintained:

- Establish quality standards for all semi-independent living services commissioned by Children's Services;
- Establish a Semi-Independent Living (SIL) Contract Officer post to monitor and manage SIL services commissioned by Children's Services;

<sup>2</sup> Homeless young care leavers aged between 18 and 25 will be in 'priority need' if they were looked after at any time between the age of 16 and 18. From the age of 21, they may also be in priority need if they are vulnerable because they were previously looked after.



- Commission a Framework Agreement for additional out-of-borough 'Semi-Independent Living' placements that may be required by the three boroughs.

**3.7** The Children's Services department is currently implementing the recommendations of the SIL Commissioning Strategy. The department plans to work closely with colleagues in Westminster's Housing department in order to explore how its vision and recommendations for care leavers' supported accommodation can be embedded in the contracting arrangements when services are re-commissioned by Westminster Housing. Both departments will work together to ensure that care leavers are achieving the best outcomes across all supported housing services.

**3.8** Safeguarding of these young people is enhanced by a number of measures being put in place by the department, including:

- Spot purchasing of placements in Greater London to be replaced by a Framework Agreement with clearly defined and agreed service specification, terms and conditions;
- Placement monitoring to be led by a dedicated SIL officer to review quality of services, including safeguarding policies, procedures and other measures for protecting young people;
- All out-of-borough SIL placements to meet the SIL Quality Standards established by the Children's Services department, which cover safeguarding measures and workforce training requirements in detail.

**Recommendation:** We recommend that the Semi-Independent Living strategy is implemented as soon as possible. We believe that the role of the Semi-Independent Living (SIL) Contract Officer should also provide evidence and learn from other parts of the Council, such as the Housing Commissioner responsible for supported accommodation, in order to share intelligence on quality, the safety of other London Boroughs and general safeguarding issues.

### Responsibilities of Westminster for non-Care Leavers leaving supported accommodation

**3.9** In relation to 'Young People at Risk' (i.e. non-Care Leavers) who leave supported accommodation,

there is no statutory obligation to provide further assistance to those who move within or outside of Westminster. However, unlike other local authorities, Westminster helps young people in this category to move on to stable accommodation within and outside of the City. Between April and December 2014, of the 146 residents in supported accommodation, 89% of 'young people at risk' had 'moved on' to one of the following types of accommodation (the target is at least 75%).

- Returned home to parents / guardians
- Halls of residence (university)
- The Private Rented Sector
- Registered Provider housing within Westminster

**3.10** To support residents to 'move on' successfully, there are a number of measures to ensure that young people are properly supported to live independently. For example, hostels provide six months of resettlement support to each young person, the provision of a 'rent deposit' service to secure accommodation, training flats and in-borough low-level resettlement accommodation. There is also floating support provided to ensure that young people find the right type of accommodation and are supported to make the right choices when considering how to live independently. Many of the young people moving out of the borough may return to their previous supported accommodation to provide updates on their transition to independent living

**3.11** It would be useful to evaluate the outcomes for young people who have been in supported accommodation in Westminster and now live independently, to assess how young people have been supported with skills, knowledge outside supported housing and numbers of young people returning back to Westminster due to tenancy breakdown.

**Recommendation:** We recommend that some resource is granted to the Supporting People Housing Commissioner to evaluate outcomes for young people who have been in supported accommodation in Westminster, specifically within the 'Young People at Risk' cohort.

## 4. RECOMMENDATIONS

### Hostel accommodation

**Recommendation:** We consider that Housing and Children's Safeguarding officers need to review with hostel managers and Children's Services staff any outstanding training needs in respect of sexual exploitation. This should be done on a rolling basis to ensure needs are monitored.

**Recommendation:** We would also recommend that Supporting People Housing Commissioner continue to ensure that hostel staff on agency or short-term contracts are sufficiently trained for their role in relation to safeguarding. In tandem, we recommend that staff turnover should continue to be monitored closely to assure against safeguarding issues.

### Hostel accommodation

**Recommendation:** We recommend that the changes in process and procedure that came about as a result of this review (e.g. MASE) continue to be supported by senior management at Westminster City Council. Staff should be allowed to maintain adequate resource to ensure the continuation of the models outlined in this report. We consider that as a minimum, the MASE should include former 'Looked After Children' and on a case-by-case basis those who were not in the care of Westminster.

**Recommendation:** We recommend that the 'Supporting People' Housing Commissioner is invited to attend to the MASE when relevant.

**Recommendation:** We recommend that the Child Protection Advisor and Adult Safeguarding Lead (where appropriate) attends the Young Person's Housing Forum to provide briefings on relevant legislative changes and updates to the Forum, in order to increase awareness about any emerging patterns to ensure appropriate action is taken.

**Recommendation:** We recommend that Housing Commissioners continue to ensure that safeguarding and sharing of information continues to take place across the various fora and that these arrangements are reviewed in partnership with key stakeholders to show the effectiveness of these arrangements.

**Recommendation:** Children's Services have

reported that they are keen to explore the possibility of supported accommodation provision which is dedicated for Care Leavers with Westminster Housing commissioning colleagues, we recommend that the implications of this are fully understood and discussed with a range of stakeholders.

**Recommendation:** We recommend that the locality teams in Westminster consider their role(s) in relation to safeguarding young people in supported accommodation.

### Other Local Authorities

**Recommendation** We note that 'Looked after Children' from another local authority who approach our supported housing directly, and are unable to gain access, may be at risk. As such we recommend that the advice and assistance offered by the duty and assessment team is sufficient and does not place these young people at further risk. We further recommend that Children's Services monitor such cases closely.

### Police

**Recommendation:** We believe that the Police should clarify the best model for assessing and analysing intelligence in respect of sexual exploitation, either through the new MASE or otherwise.

**Recommendation:** We consider that the Police should work with Westminster City Council in respect to more formalised information-sharing protocols, especially in relation to young people between the ages of 16 and 25.

### Adult Safeguarding

**Recommendation:** We believe that Adult Safeguarding should work more closely with the 'Supporting People' Housing Commissioner, given that the implementation of the Care Act began in April 2015. Whilst there is already a draft joint 'Local Safeguarding Children's Board (LSCB)' and 'Safeguarding Adults Board' protocol in which one of the areas is a pathway for joint working arrangements, the Chairmen of our local Boards should have relevant 'link meetings' to provide assurance that the transition group is being considered by both Boards.

### **Integrated Gangs Unit**

**Recommendation:** We recommend that the Integrated Gangs Unit ensures that it regularly shares information and intelligence with those commissioning support services to young people who are securing accommodation both within and outside the City of Westminster. In this way providers should be kept apprised of risks facing young people in London.

**Recommendation:** We recommend that there should be representation on the Young Person Housing Forum from the Integrated Gangs Unit.

### **Children's Services**

**Recommendation:** We recommend that the Semi-Independent Living strategy is implemented as soon as possible. We believe that the role of the Semi-Independent Living (SIL) Contract Officer should also provide evidence and learn from other parts of the Council, such as the Housing Commissioner responsible for supported accommodation, in order to share intelligence on quality, the safety of other London Boroughs and general safeguarding issues.

### **Housing**

**Recommendation:** We recommend that some resource is granted to the Supporting People Housing Commissioner to evaluate outcomes for young people who have been in supported accommodation in Westminster, specifically within the 'Young People at Risk' cohort.







City of Westminster