

Impact Assessment

Assessment of: Devon Sufficiency Strategy – Homes for Children

Service: Childrens Services

Head of Service: Vikki Hearn

Version / date of sign off by Head of Service:

Assessment carried out by (job title): Service Manager Commissioning and Homes for Children

1. Description of project / service / activity / policy under review

The Sufficiency Duty contained in section 22G of the Children Act 1989 requires Local Authorities, as far as is reasonably practicable, to ensure that there is sufficient accommodation to meet the needs of those children they have a Corporate Parenting responsibility for within their Local Authority Area. Although the sufficiency duty applies in respect of all looked after children it recognises the importance of earlier, preventative action to support children and families so that fewer children become looked after by targeting services to those who are on the edge of care. This strategy outlines how Devon will fulfil these duties.

2. Risk assessment, limitations and options explored (summary)

Recommendations for Cabinet members (please see Cabinet Report for further details) to:

Approve the Sufficiency Strategy 2024 - 2029 to be published as a high-level on-line strategy

This will be subject to annual review.

Commissioning intentions and priorities identified within Sufficiency Strategy aim to: -

- Promote Early Help by strengthening approaches and provision for children and young people on the edge of care, supporting young people at an earlier point and at the right time.
- Improve outcomes for Children in Care and Care Leavers by ensuring they develop the skills and abilities they need to move onto independence with confidence following personalised support, can influence the care and placement they receive, increase variety of provision in the local area.
- Improving stability and permanence of placements to help children and young people feel safe and build resilience whilst ensuring access to high quality local provision, wrap around support services a Prepare our children and young people for adulthood by developing the market and ensuring effective quality assurance for supported accommodation providers and increasing the number of adoptive homes and special guardianship orders.
- Increase in access to family-based care by increasing fostering sufficiency and friends and family fostering options, ensuring support for complex needs and emergency placements and where residential care is needed use this in an outcome focused and time limited way.

- Implement Steps programmes (Step Across, Step Closer and Step Forward) to ensure that children and young people are found homes that match their permanence plan and ensure that those currently out of area are provided with the opportunity to return to Devon where appropriate.
- The risk assessment can be found as an appendix to the Sufficiency Strategy
- All actions identified within the Strategy sit under the A Place Called Home Programme and are monitored by the Corporate Parenting Board via the 'Care For Me' Subgroup.

3. People affected, diversity profile and analysis of needs

Devon covers a large geographical area and has a County Council with eight District Councils. There is complex combination of coastal, rural and small urban localities with one city. Each locality has its own unique socio-economic challenges and identity. In Devon 8.47% of children in care are unaccompanied asylum-seeking children. It has a population of 1.2 million people who are predominantly white with only 4.2% of residents identifying themselves as Asian, Black, Mixed or other in the 2022 Census

This lack of diversity is also evidenced in the data relating to religion, which can be particularly relevant when considering how we meet the cultural needs of Young Asylum Seekers. [Engagement with care leavers has also indicated that rural areas present more difficulties for inclusion and access to resources than urban areas.](#)

The level of deprivation across Devon as a whole, is broadly the same as the average across England and Wales. This classifies the elements of deprivation as being Education, Employment, Health and Housing. However, some rural, coastal, and isolated communities are more negatively impacted across the county.

The projected population of children and young people, for the period 2024 to 2029 has been used as the basis for predicting the number of Children in Care (CiC) per year as per the table below. Devon currently has a rate of 59 Children in Care per 10,000 child population (which is about average when benchmarked against our statistical neighbours). The number of Children in Care is projected to remain at broadly the same level during the period 2024 to 2029

16.95% of children in care have a disability.

There are 873 Devon Children in Care of whom 204 (23.36 %) have an Education Health and Care Plan and a further 110 children (12.6%) have Special Educational Needs and receive support within their educational setting.

4. Stakeholders, their interest and potential impacts

- Devon Integrated Care Board
- Child and Family Health Devon (CaMHS Provider)
- Exeter City Council and the District Councils
- Devon and Cornwall Police
- Providers of Registered Childrens Homes
- Independent Fostering Agencies
- Schools and Education Teams
- Primary Care Networks
- Devon County Council as Corporate Parent
- Children, Young People and their Families

5. Additional relevant research used to inform this assessment

- Comparative data from National from DFE and Public Health including Regional Benchmarking.
- Education data and benchmarking.
- Local data from Business Intelligence Reports relating to performance and trends.
- Population Data from the Census

6. Description of consultation process and outcomes

Consultation via face to face workshops with providers of registered childrens homes, independent Fostering and 16+ Supported Accommodation

Initial views of Young People gathered via the Participation Team

Comments from these groups are contained within the Data and Needs analysis that underpins the Sufficiency Strategy

Background information

7. Equality analysis

Under the Equality Act 2010, the local authority must consider how people will be affected by a service, policy or practice. In so doing we must give due regard to the need to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good

relations across protected characteristics of age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (for work), sex, sexual orientation, race, and religion and belief. The Equality Act 2010 and other relevant legislation does not prevent the Council from taking difficult decisions which result in service reductions or closures for example, it does however require the Council to ensure that such decisions are: informed and properly considered with a rigorous, conscious approach and open mind, taking due regard of the effects on the protected characteristics and the general duty to eliminate discrimination, advance equality and foster good relations; proportionate (negative impacts are proportionate to the aims of the policy decision); fair, necessary, reasonable, and those affected have been adequately consulted.

All residents by geographic area

This strategy will support increasing provision for children in care in those areas where there are evidenced gaps in provision, This will increase the opportunity for children in care to be offered a home within their local community allowing them to maintain community links and avoid educational disruption. This will be a positive impact on this cohort of young people.

Age

The Strategy relates to children and young people in care or on the edge of care aged 0-18years. It also applies to care experienced people (up to 25 years) The strategy will positively impact on this group as it will improve the range and quality of provision able to meet their needs as identified via their care plan or, in the case of care leavers their move on plan.

Disability (includes sensory, mobility, mental health, learning disability, neurodiversity, long term ill health) and carers of disabled people

This positively impacts children in care or on the edge of care of which 16.95% have a disability by ensuring that care provision is developed in areas where there are currently gaps it will reduce the negative impact of being moved from their home community and potential educational disruption.

Race and culture: nationality/national origin, ethnic origin, skin colour, religion and belief, asylum seeker and refugee status, language needs

8.47% of children in care are young asylum seekers, this strategy seeks to ensure that their needs are met in all domains including their cultural needs through access to community facilities to reflect their faith and language to promote their sense of belonging and inclusion.

Whilst Devon has low numbers in the general population of people from minority ethnic backgrounds, with just 4.2% of residents identifying themselves as Asian, Black, Mixed or other in the 2022 Census, this figure increases to 6% for children in the care of the local authority.

Young people requested that Devon County Council promotes a better understanding of the issues experienced by Young Asylum Seekers and change the way we refer to this group of young people from UASC to Young Asylum Seekers.

There are very few reported incidents of racism but this may reflect that young people do not have the confidence to share their experiences or know what to do if they encounter racism. This requires the Local Authority to challenge the wider system around support for Young Asylum Seekers.

Sex and gender identity and reassignment (including men, women, non-binary and transgender people), and pregnancy and maternity (including women's right to breastfeed)

Several young people in care identify with a gender different to that assigned to them at birth. This strategy aims to ensure that all care providers can support young people whatever their gender identity and ensure that they are valued as individuals and are not subject to discrimination. This will have a positive impact on the young people.

Sexual orientation, and marriage/civil partnership if work related

This strategy aims to ensure that the young people in care and those with care experience are not subject to adverse treatment or other discrimination relating to their sexual orientation. Providers will be expected to have clear policies in place to ensure that staff are non-discriminatory and value each young person as the unique individual that they are.

Other relevant socio-economic factors and intersectionality

This includes:

- people on low incomes, children in care and care experienced people, armed services veterans, family background (size/single people/lone parents/family carers etc.), sub-cultures, refugee status, asylum seeker no recourse to public funds.
- housing quality and tenure, education and skills, language and literacy skills, health and wellbeing.
- rural isolation, access to services and transport, access to ICT/Broadband, social connectivity.

Also consider intersectionality with other characteristics.

Devon County Council has recognised the potential adverse effects of being care experienced and has adopted care experience as a protected characteristic throughout the local authority. This was a request from the care experienced young people and is having a positive impact.

It is also clear that care experienced young people are facing significant challenges in relation to the affordability of accommodation once they are working and that this may be a disincentive to engagement in employment. There is work ongoing to identify ways in which this can be ameliorated which will include exploration of approaches taken in other local authority areas for example discretionary reductions in council tax and financial support for move on to independent

accommodation from supported living arrangements. This has the potential to positively impact on this cohort of young people.

8. Human rights considerations:

We need to ensure that human rights are protected. In particular, that people have:

- A reasonable level of choice in where and how they live their life and interact with others (this is an aspect of the human right to 'private and family life').
- An appropriate level of care which results in dignity and respect (the protection to a private and family life, protection from torture and the freedom of thought, belief and religion within the Human Rights Act and elimination of discrimination and the promotion of good relations under the Equality Act 2010).
- A right to life (ensuring that nothing we do results in unlawful or unnecessary/avoidable death).

The Strategy will ensure that as provision is developed in line with identified need, children and young people will be able to express their preferences about where they live in Devon and maintain their education and friendships. They will also receive high quality of care and be treated with dignity and respect.

9. Environmental analysis

An impact assessment should give due regard to the following activities to ensure we meet a range of environmental legal duties. The policy or practice does not require the identification of environmental impacts using this Impact Assessment process because it is subject to (please mark X in the relevant box below and proceed to the 11, otherwise complete the environmental analysis information below):

Devon County Council's Environmental Review Process	
Planning Permission	
Environmental Impact Assessment	
Strategic Environmental Assessment	

Reduce, reuse, recycle and compost

Not Applicable

Conserve and enhance wildlife

Not Applicable

Safeguard the distinctive characteristics, features and special qualities of Devon's landscape

Not Applicable

Conserve and enhance Devon’s cultural and historic heritage

Not Applicable

Minimise greenhouse gas emissions

Not Applicable

Minimise pollution (including air, land, water, light and noise)

Not Applicable

Contribute to reducing water consumption

Not Applicable

Ensure resilience to the future effects of climate change (warmer, wetter winters; drier, hotter summers; more intense storms; and rising sea level)

Not Applicable

Other (please state below)

Not Applicable

10. Economic analysis

Impact on knowledge and skills

By ensuring that children and young people in care have stability in a settled home it will enable them to engage in education and minimise disruption. This will promote the development of knowledge and skills leading to improved educational outcomes.

Impact on employment levels

By addressing issues identified by care leavers such as stability and cost of accommodation and increased opportunity to secure independent tenancies it will address the challenge articulated by working young people that they are worse off by working and have less disposable income.

Impact on local business

Not Applicable