

**From:** Christine McInnes, Interim Corporate Director of Children, Young People and Education

**To:** Christine Palmer, Cabinet Member for Integrated Children's Services

**Subject:** KCC's Sufficiency Strategy – 2025 to 2028

**Decision No:** 25/00093

**Key Decision:** Yes  
Savings or expenditure of more than £1m  
Affects two or more Electoral Divisions

**Classification:** Unrestricted

**Past Pathway of report:** Children's, Young People and Education Cabinet  
Committee 18 November 2025

**Future Pathway of report:** Cabinet Member Decision

**Electoral Division:** All  
<https://democracy.kent.gov.uk/mgMemberIndex.aspx?bcr=1>

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**Is the decision eligible for call-in?** Yes

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**Summary:** This report provides the Children's, Young People and Education Cabinet Committee with an overview of the steps taken to update and renew the previous Sufficiency Strategy 2022 to 2027 so it reflects the position in 2025 and covers the period to 2028.

**Recommendation(s):**

That the Cabinet Member for Integrated Children's Services consider the following proposal:

- a) Adopt the Sufficiency Strategy from 2025 to 2028, and
- b) Delegate authority to the Corporate Director for Children, Young People and Education or other Officer as required by the Corporate Director to review the Sufficiency Strategy on an annual basis and make revisions to the strategy where changes do not require additional governance.

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## **1. Introduction**

- 1.1 On 27 July 2022, the Corporate Parenting Panel endorsed KCC's previous Sufficiency Strategy for 2022 to 2027 which sets out the Council's approach to meet its statutory responsibility to provide secure, safe and appropriate accommodation to Children in Care, Children in Need and Care Leavers.

- 1.2 Following presentation of the annual review of the Strategy in 2024, the Panel requested that the Strategy be reviewed, modernising its format and reflecting the significant changes seen in both Children's Social Care nationally and in Kent. The Strategy covers the supply of accommodation and describes, at a high level, demand for accommodation, current accommodation options available and the forecast utilisation of this accommodation. It provides the forecast of future needs for all Children in Care, Children in Need and Care Leavers.
- 1.3 Whilst the impact of the High Court Judgment in 2023, which placed a duty on KCC to accommodate all newly arriving Unaccompanied Asylum-Seeking Children (UAS children), did affect the sufficiency of accommodation for our Children in Care, the expansion of KCC's estate and the improvements of the National Transfer Scheme has mitigated most of the challenges, therefore this Strategy is focused on our citizen children.

## **2. Development of the Sufficiency Strategy**

- 2.1 Embracing the Government's 2023 'Stable Homes Built on Love'<sup>1</sup> strategy and implementing the six pillars of reform will lead to greater sufficiency and therefore these pillars are the foundation for KCC's Sufficiency Strategy. This vision is underpinned by the fundamental principle of the Children Act 1989<sup>2</sup> that children's welfare is paramount. The six Pillars are:
1. Family help provides the right support at the right time so that children can thrive with their families.
  2. A decisive multi-agency child protection system.
  3. Unlocking the potential of family networks.
  4. Putting love, relationships and a stable home at the heart of being a child in care.
  5. A valued, supported and highly skilled social worker for every child who needs one.
  6. A system that continuously learns and improves and makes better use of evidence.
- 2.2 In developing this renewed Sufficiency Strategy, a Task and Finish Group was established to:
- Finalise the Strategic priorities of the Sufficiency Strategy, including identifying their outcomes.
  - Use the feedback from the consultation with operational teams to identify current and future local accommodation to address the challenges for children, Care Leavers, and their families and how these interact with national challenges.
  - Scope work and agree actions to take forward for the Council to meet sufficiency.
  - Inform the content and layout which needs to be within the revised Sufficiency Strategy.

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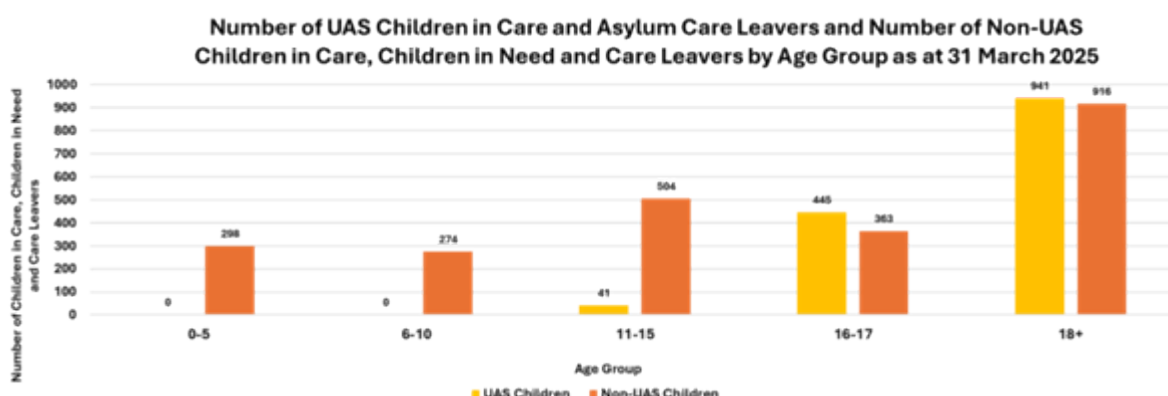
<sup>1</sup> [Guide for children and young people: Stable Homes, Built on Love - GOV.UK](#)

<sup>2</sup> [The Children Act 1989 guidance and regulations](#)

- 2.3 The Sufficiency Strategy 2025 to 2028 (attached at Appendix A) continues to underpin how our access to accommodation and support can be increased. There is a focus on providing safe environments for children and young adults for whom the authority has a Corporate Parenting responsibility.

### 3. Background

- 3.1 Demand for placements across Children's Social Care is increasing and therefore we must manage placement matching well, buy services from providers that can expand in capacity and deliver value for money and good outcomes. All services are seeing children and young adults with more complex lives and as such require different approaches and models of support. Additionally, placements in Kent from other Local Authority children restricts Kent's access to local provision and impacts affordability.
- 3.2 The number of children in care now, in comparison to 2022, has increased from 1,768 (March 2022) to 1,895 (March 2025), including 545 Unaccompanied Asylum Seeking (UAS) Children (March 2025). This is an increase of 7.2%.
- 3.3 The graph below shows that age group 11-15 has the highest number of non-UAS Children in Care and age group 16/17 has the highest number of UAS Children in Care. There are no UAS Children in the 0-5 and 6-10 age groups.



- 3.4 Whilst there is slight variance in end of year figures, many more children have entered and left KCC's care over recent years with the sharpest rise noted for UAS children with 1,133 being welcomed in 2022/23; 2,179 (63.5% increase) being welcomed in 2023/24 and 2,691 (23.5% increase) in 2024/25. These increases are a direct result of the High Court Judgement in 2023 with more UAS children coming into care of the Council rather than continuing to be supported by the Home Office. Many of these children stay with KCC for a short while, a matter of days or weeks, and are then transferred to another Local Authority. In 2024/25, 2,341 UAS Children moved under the National Transfer Scheme (NTS) to another Local Authority.
- 3.5 All UAS Children aged 16/17 who are under the care of KCC, will transfer into Supported Accommodation Low Needs Service after and an agreed period in a spot purchased Accommodation service, increasing the sufficiency in these settings.

- 3.6 The High Court ruling in 2023 made clear that KCC must take every possible step to increase its capacity to accommodate and look after all UAS Children arriving in Kent. In response, KCC subsequently expanded its accommodation and services for newly arriving children across the County. This includes seven new Reception Centres, three are registered as Children's Homes and four as Supported Accommodation premises. Social Work teams have expanded from three to six teams to assess children's needs and match placements upon arrival, before supporting them to transition to more permanent homes cross the UK. KCC has accommodated every UAS child upon arrival to Kent, providing them with a welcoming and safe home from which to recover and resettle across the UK.
- 3.7 The cost of placements and support for UAS Children and former UAS Children Care Leavers is expected to be fully funded from Home Office Grants and is not a cost to the KCC General Fund. Conversely, the cost of placements and support for citizen children is mainly funded from the KCC General Fund (along with a small contribution from Health and specific government grants).
- 3.8 KCC currently spends 13% of its net budget (General Fund) on looked after children placements equating to £117m (32% on all children's services and education), of which a considerable proportion is for children placed in externally commissioned Residential Children's Homes. In 2024/25, a total of £108m was spent on citizen looked after children placements of which £51m was for residential care placements, and this proportion will rise. Whilst the number of children in residential care is relatively low (187 out of 1,400 children), the cost of placements is significantly higher than other types of support.
- 3.9 All residential placements are spot purchased and therefore lacks the contract management and market oversight compared to other Local Authorities who operate a relational approach with their residential providers. The main driver of demand for Residential Children's Homes is the need to secure a suitable placement for Children in Care with particularly complex needs and/or a history of placement breakdown.
- 3.10 The government are giving new powers to Ofsted, as part of the Children's Wellbeing and Schools Bill<sup>3</sup>, to repress providers who exploit Social Care with ambitions to limit the amount of profit a provider can make. This may affect the transparency of some providers and KCC will need to look at better ways to work with providers to build trusting and open relationships.
- 3.11 The Bill includes the provision of a statutory framework to authorise a Deprivation of Liberty Safeguards (DOLS) for children who need it to keep them safe, in accommodation other than a Secure Children's Home. There is likely to be a number of children who will require a DOLS in place if they are deprived of their liberty.
- 3.12 KCC are developing its own in-house Residential Homes with the ambition of creating four, two-bedroom homes across the county supporting Kent's most complex children.

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<sup>3</sup> [Children's Wellbeing and Schools Bill - Parliamentary Bills - UK Parliament](#)

- 3.13 Supported Accommodation is used for 16/17-year-old Children in Care and some on the edge of care. There has been a national challenge in relation to delays by Ofsted for registration of providers to meet the new Supported Accommodation Regulations, introduced in 2023. This challenge has also impacted KCC as the delays have resulted in a higher number of children having to be placed out of county and in higher cost spot-purchased Supported Accommodation due to the lack of sufficiency of registered providers in Kent. This can lead to KCC having to place in unregistered provision as there are no other options available, and there is a robust process in place to make sure there is greater oversight of these children.
- 3.14 As of October 2025 the number of unregistered placements was ten, a reduction from 27 recorded in September 2024. Placement Plans are routinely updated for all children in unregistered settings.
- 3.15 The Government has included an amendment to the Children's Wellbeing and Schools Bill, to disapply the intentional homelessness test for Care Leavers up to 25, meaning no Care Leavers should be found 'to blame' for their own homelessness. This could have a positive impact to these young adults by meaning that those who breach tenancy terms (anti-social behaviour/non-payment etc) would remain able to seek relief and ongoing housing duty from District and Borough Councils, which is not currently the case. Therefore, if asked to leave a service commissioned by KCC due to such breaches, they should still have an opportunity to be accommodated by a District or Borough Council with whom they have a local connection.
- 3.16 As part of the Stable Homes, Built on Love Strategy, Care Leavers up to 25 should not be limited as to where they can apply for housing due to the removal of the local connection requirements currently placed on them. This could allow for greater choice and opportunity for housing via the District and Borough Councils, although is likely to be limited in impact by lack of availability of housing stock and resources.

#### **4. Voice of the Child**

- 4.1 Children's voices are heard day to day through the Social Worker, the Independent Reviewing Officer and other professionals working with the child. Commissioning seeks the views of children when they commission services and through contract management, undertaking annual reviews of services and understanding whether there is satisfaction of services through surveys, focus groups and talking to children when visiting services
- 4.2 Through established networks organised by the Participation Team, a working group is underway related to Child and Family Feedback which seeks to develop a county wide strategic approach to Child and Family Feedback across KCC's Integrated Children's Services in line with the Participation Framework. This Group is looking to streamline feedback methods and ensure that the voice of children and families are fed back to improve practice and influence service design and delivery at local and county level. Any projects that are taken forward to develop sufficiency may be subject to consultation and engagement with children and families.

- 4.3 The Children's Outcome Analysis has been designed to give an insight into the current practice of the Integrated Children's Services teams and provides bespoke lines of inquiry aligned to the Children's social care National Framework<sup>4</sup> to offer more impactful insights of areas of strength and development within those services.
- 4.4 Commissioned providers have continuous improvement logs to record lessons learnt and feedback from children and Children in Care Teams.

## **5. Financial Implications**

- 5.1 Finding ways to manage the Council's financial pressure, whilst still maintaining good outcomes for children and young people, is an essential part of supporting the Council's financial sustainability. The Sufficiency Strategy looks at ways that we can improve sufficiency which will support the Council with managing this financial pressure and achieving the best outcomes for our children and young people.
- 5.2 The total net budget for children looked after in 2024/25 was £105m in 2024/25 and was overspent by £3m. Responding to the trend in increasing costs of placements, the Council has responded and invested further funding, increasing the budget to £117m in 2025/26, although the initial forecast is still indicating a possible overspend of £6.5m. This rise in cost is being driven by a reduction in our most cost effective placement offer (in-house foster carers) resulting in a greater reliance on more costly externally purchased alternatives, such as residential care. In addition, the cost of externally commissioned placements is also rising, exacerbating this financial impact, and escalating costs.
- 5.3 The cost of UAS Children placements and associated support is expected to be fully funded from Central Government via the Home Office specific grants for Kent based UAS Children, former UAS Children Care Leavers and newly arrived children being temporarily supported until a permanent Local Authority is confirmed through the National Transfer Scheme. Whilst there is no direct cost to KCC, KCC still has a responsibility to secure value for money on supporting UAS Children and the placements secured. In addition, the grant for UAS Children (and former UAS Children Care Leavers) supported long-term by Kent has remained static for a number of years, therefore ensuring ongoing efficiencies to secure affordability within the grant provided is important.
- 5.4 The Strategy sets out a number of activities and services either being or will be undertaken to support future sufficiency. It is part of the foundations required to frame the activity needed to deliver overall savings and improve quality therefore, the Strategy itself does not constitute either a direct financial cost or saving. However, the activities undertaken to support the outcomes of the Strategy are intended to improve overall quality and cost effectiveness. The Medium Term Financial Plan agreed by County Council in February 2025, including savings totalling £3.6m over the next three years including the impact of the new Kinship service and development of in-house residential provision.

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<sup>4</sup> [Children's social care: national framework - GOV.UK](https://www.gov.uk/government/publications/childrens-social-care-national-framework)

- 5.5 Any activity arising from the Sufficiency Strategy that constitutes a Key Decision will be subject to the Council's established governance processes.

## **6. Legal Implications**

- 6.1 The Council has a statutory duty to provide suitable and safe accommodation with the right level of support for Children in Care (including UAS Children) in accordance with the Children's Act 1989.
- 6.2 The Sufficiency Duty (Section 22G of the Children Act 1989) requires Local Authorities, so 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.
- 6.3 The Council must provide Care Leavers (including former UAS Children) with support and financial support to assist in prompting their welfare, especially in relation to maintain suitable accommodation and helping them access education, training, and employment.
- 6.4 The Council must comply with s.149 of the Equality Act 2010. It is an "have regard to" duty for Councils when exercising their functions, to "... eliminate discrimination, harassment, victimisation...advance equality of opportunity... and foster good relations...".

## **7. Equalities Implications**

- 7.1 An Equality Impact Assessment has been completed and did not identify any negative impact on protected characteristics.

## **8. Data Protection Implications**

- 8.1 There are no implications as a result of this Strategy as there is no personal data being processed.

## **9. Other Corporate Implications**

- 9.1 The draft Strategic Statement "Reforming Kent 2025 to 2028" includes priorities recognising the need to work with the Home Office on the effectiveness of the National Transfer Scheme, the development of in-house Children's Homes and make representations at national level for a revised, needs-based funding formula for children's social care that recognises the burden from other Local Authorities placing so many of their Looked After Children into Kent which aligns with the Sufficiency Strategy.

## **10. Governance**

- 10.1 Should the Cabinet Member for Integrated Children's Services agree to adopt this Strategy, it will be published on [www.kent.gov.uk](http://www.kent.gov.uk) with all previous documents removed.
- 10.2 A delivery plan will be developed and monitored and annual reviews will be undertaken to ensure the Strategy remains current and fit for purpose.

## **11. Conclusion**

- 11.1 The Children Act 1989 requires local authorities to secure accommodation for children in their care, within local authority boundaries whenever practicable and appropriate, known as the 'sufficiency duty'. Local Authorities should publish a sufficiency strategy or statement setting out the local arrangements to meet the duty.
- 11.2 Whilst the sufficiency duty applies in respect of all Children in Care, 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. KCC's Kinship Service, Family Hubs and Early Help Services take action to support a child and/or their family early in the life of challenges or as soon as difficulties emerge.
- 11.3 Embracing the government's 2023 'Stable Homes Built on Love' and implementing the six pillars of reform will lead to greater sufficiency within Kent and have therefore chosen to use these pillars as the foundation for this strategy. This vision is underpinned by the fundamental principle of the Children Act 1989 that children's welfare is paramount.
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## **12. Recommendation(s):**

That the Cabinet Member for Integrated Children's Services consider the following proposal:

- a) Adopt the Sufficiency Strategy from 2025 to 2028, and
  - b) Delegate authority to the Corporate Director for Children, Young People and Education or other Officer as required by the Corporate Director to review the Sufficiency Strategy on an annual basis and make revisions to the strategy where changes do not require additional governance.
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## **13. Background Documents**

- 13.1 The legal requirements around every local authority's "sufficiency duty" are set out in section 22 of The Children Act 1989  
<https://www.legislation.gov.uk/ukpga/1989/41/section/22G>
- 13.2 Equality Impact Assessment

## **14. Appendices**

- 14.2 Appendix A - Sufficiency Strategy 2025 to 2028

<https://sway.cloud.microsoft/He2n4tr2DpC8AKzx?ref=Link>

## **15. Contact details**

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