

Appendix A

Draft Consultation Response

Question No	Question	KCC Response
Corporate Parenting Guidance		
1	Does the draft guidance provide a clear narrative for local authorities about what the corporate parenting principles mean for local authorities in practice?	<p>KCC is heartened to see that Government is strengthening and expanding corporate parenting responsibilities, to enable us to work better in collaboration with our partners to provide the right support to some of the most vulnerable young people in our county. However, we believe there is a lack of clarity around District Council's responsibilities in relation to care leavers as corporate parents in this guidance. It is suggested the guidance should make it clear that all tiers of local Government should prioritise the needs of care leavers in relation to the discharge of their functions, as commensurate with their provision. At present, the guidance stops short of making responsibilities in relation to housing provision mandatory, for example.</p> <p>We also feel the new guidance should address the designation of some care leavers as 'intentionally homeless'. For example, if a young person has serviced time in custody, it can be argued that this is an intentional action which, as a consequence, means the local housing authority is unable to discharge its duty in terms of the providing that young person with accommodation. If it was recognised that no care leaver has intentionally made themselves homeless, this would compel all partners to work together to provide that young person with the support they need to make a successful transition to adulthood and independent living.</p>
2	The corporate parenting principles apply to looked after children and care leavers. Is there enough content about how the principles apply to both groups?	We are unclear in relation to the direction that all local authorities should have regard to the needs of Looked After Children and care leavers whether they are or were the local authority looking that a particular child. Is this applicable to both Counties and Districts? Or to children placed out of county by their home authority?

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3	Is there anything in the guidance that should be amended? If so, what?	<p>Could additional detail be provided in relation to how the various Council service areas should give due regard to the seven principles regarding their functions, and how this should be evidenced? In particular, we would like additional clarity in relation to housing, leisure and recreation and tax collection.</p> <p>KCC also feels the requirement for local authorities to ensure that all Looked After Children and care leavers are able to access appropriate services provided by other partner agencies such as health challenging. Mental health transitions pose a particular concern, and we would welcome an amendment to the guidance which would make care leavers a priority group to receive such support. We would also appreciate clarity regarding how we can enact our duties in the face of vulnerabilities in the services of our partner agencies. For example, if a local health provider is in difficulty and under an improvement notice which means they are unable to provide adequate services to meet the needs of young people, where does this leave the local authority in terms of culpability?</p>
4	Is there anything that is missing from the guidance? If so, what?	Please see KCC responses in relation to questions 1-3 and 5.
5	Do you have any other comments about the guidance?	We note that local authorities will be expected to make arrangements to ensure that no Looked After Child is refused a mental health or other health service on the grounds of their placement being short-term or unplanned. From past experience, this can be at odds with the approach taken by colleagues in Child Adolescent Mental Health Services, who have held off interventions with such children on the grounds they are not in a stable place to engage with services in such circumstances. Will the DfE clarify whether this new approach supersedes this past practice? Can the DfE also ensure effective cross-departmental dialogue on this issue with colleagues in the DoH.

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6A	Do you have any best practice case studies or examples you would like to share with us for inclusion in the final version of this statutory guidance?	
6B	Do you give permission for your example to be included in the guidance?	
6C	Please confirm whether you would like your example to remain anonymous.	
Local Offer Guidance		
1	Does the guidance sufficiently explain the role and responsibilities of local authorities to develop their own local offer?	<p>KCC would like more clarity in relation to the stipulation that the local offer should provide information about all the services and support that is available to care leavers in the local area where they live. What level of support will host authorities be required to provide to Other Local Authority Looked After Children and care leavers living within their Local Authority Area? If additional support needs to be provided to this cohort, what support and funding may be made available to help local authorities that have high numbers of OLA LAC?</p> <p>KCC would also like clarity regarding how we can encourage our partners to prioritise the needs of care leavers without additional regulation underpinning this, obliging them to do so. Will additional details be provided in this regard?</p>
2	Is the relationship between the seven corporate parenting principles and the local offer sufficiently clear?	Yes
3	Do you have any further comments on the local offer guidance?	We suggest that the guidance should make it a requirement that all tiers of local Government should work together to ensure that care leavers are provided with suitable housing and that this should feature in all care leaver offers; at present, this is not presented as an

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		<p>obligation.</p> <p>We also feel there is a need for clear guidance to be issued to other partner safeguarding agencies –including the police, probation services and schools – regarding their responsibilities towards care leavers and providing them with a mandate to work together to facilitate positive outcomes for this cohort of young people.</p> <p>Finally, we believe there is a risk in relation to the provision that care leavers should be able to access all the service and support that is available in the local area where they live. This may have the unintended consequence of incentivising local authorities to place children out of area, and subsequently to close their cases – transferring the responsibility for the provision of services from the placing authority to host local authority. As there is precedence for this in relation to Child Protection cases in the 1990s, could the guidance be augmented to ensure this cannot happen in practice?</p>
Specifically In relation to the ‘illustrative’ example local offer (at Appendix B):		
4	Is the structure and content of the illustrative local offer helpful to local authorities in designing their own offer to care leavers?	Yes
5	Is there any other information that you think should be included in the illustrative local offer?	No
6	Do you have any further comments on the illustrative local offer?	
Extending Support from Personal Advisers to all care leavers age 25		
1	Does the draft guidance provide a clear narrative that will help local authorities to implement the new duty locally?	Yes
2	Does it clearly explain what the new duty means in practice for local authorities?	Yes

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3	Is there anything further that might be included that would make the guidance more helpful; or is anything missing, and if so, what?	No
4	Is there anything that is missing from the guidance? If so, what?	No
5	Do you have any other wider comments about the guidance and its content?	<p>Will adequate levels of additional funding be made available to assist local authorities to increase the capacity and capability of their PA support, commensurate with the full cost of the increase in provision? To give some context for the scale of these pressures, in Kent we have 1413 care leavers aged 18-25 who may request support from our care leaver's service (as of September 2017). Will this funding be provided long term, and not tapered off over time? Is Government considering updating the Knowledge and Skills Statements, to clarify the expectations in relation to the type and nature of support PAs will now be required to provide to an older cohort of care leavers?</p> <p>Furthermore, will additional monies be made available to pay for any increase in educational provision and training, if requested by older care leavers/a large majority of care leavers up until the age of 25?</p>