



**BARNARDO'S NI RESPONSE TO THE DHSSPS CONSULTATION  
ON 'STANDARDS FOR SUPPORTED LODGINGS FOR YOUNG  
ADULTS (AGED 16-21) IN NORTHERN IRELAND'**

**Background**

Barnardo's NI is the largest children's charity in Northern Ireland. We work with almost 11,000 children young people and families in more than 40 different services and programmes and in over 200 schools. Our services range from work with looked after children and care leavers, disabled young people, to early intervention programmes and family support. Specific service provision to young people leaving care includes semi-independent accommodation and support in both Belfast and Ballymena.

Barnardo's NI welcomes publication of the standards for supported lodgings for young adults in Northern Ireland. We have made specific comments and recommendations relating to those areas of the consultation where we believe we can provide added value.

**Comments and recommendations**

- ***Introduction (p.3)***

The language in the document is generally clear and easily understood. However, while it becomes clearer as one reads through the Standards, in our view the inclusion of a brief description of supported lodgings is somewhat open to interpretation. We recognise that a Statement of Purpose will provide further clarity on operational matters and model type but given that models and interpretations vary, we believe it would be useful to have a more thorough and clear definition of supported lodgings from the outset. This should also explain how supported lodgings differ from other similar forms of care and accommodation, for example, family placements, foster care etc.

**Recommendation:** Barnardo's NI recommends inclusion of a clear and thorough definition of supported lodgings in the introduction to the Standards document.

A further issue that raises questions throughout the document, for example in relation to delegation of roles and responsibilities, is clarification about who can access Supported Lodgings. The guidelines describe the service as being for young adults aged 16-21, and as able to offer an "alternative to mainstream care for 16-17 year olds as well as vulnerable 18-21 year olds." They do not however specify whether access is limited to 18-21 year olds who are vulnerable by virtue of being care experienced (or those who have entered the service through the regional Good Practice Guidance Protocol before age 18); or whether it is open to other 18-21 year olds who could otherwise be deemed vulnerable (for example those leaving the care of inpatient mental health facilities).

The corresponding standards in the document which refer to agency and practitioner roles and responsibilities may well be better understood by definition clarification. In the absence of same this response gives voice to some of the questions that arise.

**Recommendation:** Barnardo's NI recommends that the Standards document clarifies if the service is accessible to any 18-21 year old deemed vulnerable and in need of such a service.

Paragraph 3 states that the lead commissioner for the service is responsible for establishing appropriate monitoring arrangements with the providers to ensure that the requirements and conditions of the agreed service delivery model are met. As provision may be jointly commissioned, in our view this should be appropriately reflected in the document as 'lead/joint commissioner'.

**Recommendation:** Barnardo's NI recommends inclusion of the 'joint' commissioner as also having responsibility for establishing appropriate monitoring arrangements.

- ***Background (p.4)***

Barnardo's NI particularly welcomes the comment on the inter-link between social care and housing related supports. This section goes on to explain the NI model is "a host arrangement with a family with the involvement of the Supported Lodgings Service Provider, the referring

agent and, where applicable, the agency with primary responsibility for the young person.” Given that the standards relate to young people aged 16-21, it would however be useful for the document to provide some clarification about whom, and in what circumstances, has primary responsibility for the young adults who are not covered by the Children Leaving Care (NI) Act 2002 or the Regional Good Practice Protocols for 16 and 17 year olds. This may more typically mean there is a lack of clarity as to the agency with primary responsibility, for example, in respect of non-care experienced vulnerable 18-21 year olds such as those leaving the care of inpatient mental health provision.

**Recommendation:** Barnardo’s NI recommends that clarification is provided about which agency has primary responsibility for young adults, and in what circumstances, particularly those who are aged 18-21 and non-care experienced.

- ***Underpinning values and principles (p.5)***

Barnardo’s NI welcomes all the underpinning values and principles as laid out in the document. We especially welcome the inclusion of references to stability and freedom from exploitation in the safeguarding statement.

- ***Standards***

**Standard 1**

We agree with the criteria and evidence in this standard; and view a clear, robust Statement of Purpose as essential.

**Standard 2**

**Recommendation:** With regards to initial referral and assessment Barnardo’s NI recommends that greater clarity is provided on the roles, responsibilities and expectations regarding the assessment process.

***Criteria***

Point 2 – Information sharing arrangements: We welcome the statement of “forthright information sharing at point of referral and as part of the assessment process.” Information shared should always be appropriate and this may need to be expressed from the outset. Young

people have the right to know and have explained what appropriate and forthright information sharing is, and why it is required.

Point 3 – Consent forms: To provide some consistency between criteria points 2 and 3, it may be helpful if the forthright approach to information sharing advocated in point 2 is clearly linked in with and reflected in point 3.

**Recommendation:** Barnardo’s NI recommends that criteria point 3 should be reworded to follow on from point 2 and read as “young people understand and sign a consent form to enable such information to be shared between agencies.”

Point 5 - Lead Worker: As otherwise indicated, there is a need for clarity regarding access to supported lodgings, particularly for vulnerable 18-21 year olds. This leads to a number of questions requiring clarification about the role of the Lead Worker, who the role may be carried out by, and the responsible agency, especially in respect of those young people whose status does not provide a more straightforward lineation on which agency has responsibility and may designate this role (e.g. where Health and Social Care Trusts may designate a Personal Advisor or social worker to this role for looked after young people or care leavers).

In cases where the Trusts are not involved, particularly for those aged over 18, would the constraints of finding a Lead Worker external to the provider (not having ready access) create barriers to providing the service?

The document’s Glossary of Terms (p.33) suggests a Lead Worker could be provided through, for example, floating support. This suggests further requirement for protocols for floating support services to take on such a role and there is a question as to how this may be achieved in practice. It may therefore be helpful to give examples of a “nominated agency,” i.e. who is responsible for designating a Lead Worker, and provide links to the relevant guidelines such as the Regional Good Practice Protocols.

Who the Lead Worker may be, and their responsibilities, could also be further expanded. The standards presently read that a Lead Worker is always external to the provider service; however in our experience some supported lodging providers have working models incorporating key working arrangements. It would therefore be useful to state if it is the case that external Lead Workers are the requirement.

It is noted in criteria point 5 that the role of Lead Worker is in “informing” the assessment, but not who is responsible for the assessment. We presume that, where applicable, the young adult pathway assessment will inform a placement assessment carried out by the provider, but this may need clarified. In circumstances where no previous assessment exists, as would be in the case of care leaver or 16/17 young homeless, does the responsibility for the primary assessment belong with the provider, the Lead Worker or nominated agency?

**Recommendation:** Barnardo’s NI recommends that the definition of Lead Worker needs to be clarified and strengthened, most notably about who the Lead Worker is, how they are appointed, and their roles and responsibilities.

**Recommendation:** Barnardo’s NI recommends that a Provider placement assessment should be required to inform the placement agreement and support plan; this is especially important given that what may be a risk or need in one context may be magnified or lessened in another.

### **Standard 3**

We particularly welcome the content of this standard but refer again to our previous points in relation to Standard 2 regarding clarity on responsibility for assessment.

#### ***Criteria***

Point 5 – unplanned or emergency placements: The provision of initial support plans in five working days is reasonable. However, in order to clarify important information from the outset, and protect both the young adult and placement provider, an emergency risk assessment/ risk management plan should be agreed as part of the emergency placement process.

**Recommendation:** Barnardo’s NI recommends that an emergency risk assessment and risk management plan are clearly specified within criteria point 5.

## Point 7 – Placement Support Plan

**Recommendation:** Barnardo’s NI recommends that the word “resolve” is added to strengthen criteria point 7, i.e. “and to address/resolve any concerns about the young person’s placement.”

### **Standard 4**

#### ***Criteria***

Point 2 – Unplanned moves: As in the pathway planning process, in our view contingency arrangements should be included from the outset in any assessment and planning process as a matter of good practice. In doing so both the young adult and provider have peace of mind should the placement end for any reason (as with any issues relating to the young adult, this could be as much about provider ability to retain placement though sudden ill health).

**Recommendation:** Barnardo’s NI recommends that criteria point 2 include “Contingency planning should form part of the assessment planning process and be included in the placement agreements / support plan.”

### **Standard 5**

This standard is very clear and we agree with the content. Barnardo’s NI particularly welcomes the points made within Evidence (point 2) requiring hosts and staff demonstrate awareness of the risks of abuse and sexual exploitation for young people, and know how to raise awareness of such risks.

### **Standard 6**

We warmly welcome the strong participative ethos in this standard.

### **Standard 7**

The sole use of the term familial or family in describing supported lodgings may be limiting. In our experience hosts who could provide supported lodgings may be single person households attracting some young people who may find integrating into a “family” as too intimidating. There may be a need therefore to broaden and define the term “family” in these standards as to how they relate to and explain supported lodgings. The term “supportive domestic environment” has

already been used in the document and this concept may usefully be expanded in the definition.

**Recommendation:** Barnardo's NI recommends that the terms "families" and "familial environment" in describing supported lodgings provision are broadened and defined.

### **Standards 8-10**

These standards are clearly and comprehensively set out and we are in agreement with the content.

- ***Appendices***

The references to relevant sections of the Children (NI) Order 1995 and the links to the Southwark and Treacey judgements are helpful within the Standards, and we would suggest expanding these to include relevant homeless legislation and protocols.

It is unclear whether these standards relate only to those young people who are care experienced 16-21 year olds and those who are referred as 16/17 year olds, for which there is guidance (Regional Good Practice Guidance between the NIHE and HSC Trusts on meeting the accommodation needs of care leavers and young homeless aged 16/17). It would be useful to clarify whether the Standards include other vulnerable young people aged 18-21, for example, those who may be leaving inpatient mental health provision. If that is the case then it may be helpful to include links to relevant housing legislation.

**Recommendation:** Barnardo's NI recommends links to the Good Practice Guidelines (on 16/17 year olds presenting as homeless) are included within the Appendices.

**Recommendation:** Barnardo's NI recommends that the Appendices include references to the relevant housing legislation, notably the Housing (NI) Order 1988 (as amended), and possibly the definition of vulnerability within the Homelessness Strategy 2012-17 (Section 4).

For further information about this consultation response please contact:

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