



Department for  
Communities and  
Local Government

# Financial Framework for the Troubled Families Programme

January 2018



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# Introduction

The Troubled Families Programme is supporting families with multiple and complex problems; changing lives and services for the better. DCLG's last annual report to Parliament set out the scale of these problems – worklessness, uncontrolled debt, abuse and conflict in the home, mental and physical health problems. It also shows how these families, with the help provided, are making great progress.

In the past, such families have often been failed by services which responded to the one problem that presented itself at the time, whether it was truancy, domestic violence, anti-social behaviour or unemployment. Services were not designed to deal with the many and inter-related problems that a family may be facing, and as such the success of any intervention was often limited.

The Troubled Families Programme pulls together cross-government funding and support to provide a catalyst for local services to transform and work together in a more effective and cost efficient way to achieve better outcomes for families. The programme does not mandate how services should 'transform'. Instead, through this financial framework, the programme aims to incentivise a re-configuration of services around families and to encourage innovative, multi-agency practice that best fits the local context.

Local authorities and their partners have already achieved a huge amount. Services are coming together across organisational boundaries, overcoming operational and cultural barriers to achieve sustainable change for the most disadvantaged families in their communities. The impact of this service transformation can be seen in the steep increase in the numbers of families across the country receiving a 'whole family approach' and achieving significant and sustained progress against the problems they face. However there is still much left to do. Services need to further invest and align if an integrated, whole family approach to early intervention is to become the norm by the time this programme comes to an end in 2020.

This phase of the Troubled Families Programme commenced in 2015 and now, at the halfway point, it is appropriate to update the financial framework that underpins it to reflect current priorities and the learning so far. This will ensure that the most is being made from the resources that the programme offers.

This revised Financial Framework takes effect from January 2018 and replaces previous versions. It has emerged from a review that takes account of feedback received from nearly every upper-tier local authority across England. It reflects local feedback that the payment by results (PbR) approach has provided a much needed emphasis on services achieving real, tangible changes with families. However, some local authorities told us that earlier up-front investment could help them generate system change more quickly. We are therefore offering an alternative funding model:

'Earned Autonomy' that will permit some local authorities and their partners to move away from the PbR arrangement, allowing them to use more up-front investment to embed better ways of working. However, PbR will continue as the most common method of payment, reflecting the success of the model in driving a focus on outcomes for families.

The principles set out in this document concerning, for example, family working, service transformation and evaluation will continue to apply to all local authorities and their partners participating in this programme, regardless of funding arrangements. However the aspects of this framework that specifically relate to PbR will no longer be relevant to Earned Autonomy local authorities. Instead, we will agree individual memoranda of understanding with each local authority that moves to the Earned Autonomy funding model.

This revised Financial Framework now includes the Early Help Service Transformation Model and Toolkit which was developed with local authorities and their partners and launched in November 2016. The model seeks to capture the principles that underpin meaningful system and cultural change. The toolkit supports local authorities and their partners to assess how they are performing in transforming their services and driving further action. By November 2017 nearly every local authority had undertaken their first service transformation self-assessment and it is now a fundamental expectation of all local authorities participating in this programme that they will regularly review their service transformation progress using this model and toolkit.

Our national evaluation reports are already showing the positive impact of workers being trained in whole family working and using their skills, passion and commitment to support families to aspire to, and achieve, a better future. Services are coming together behind this philosophy, using this programme to achieve sustainable change for the most disadvantaged families in their communities. This Financial Framework and accompanying documents have been updated in the light of what we have learnt from the success of local programmes so far, to enable every area to achieve maximum value from the investment this programme provides, for families, services and the taxpayer.

## Financial Framework: timeline

Timeline		
2012-2015	First Troubled Families Programme	
2015-2020	Current Troubled Families Programme	
	September 2014	<b>1<sup>st</sup> Financial Framework</b> issued as an interim version for 51 early starter areas.
	November 2014	<b>2<sup>nd</sup> Financial Framework</b> issued. Revised in the light of learning from early starter areas.
	March 2015	<b>3<sup>rd</sup> Financial Framework</b> issued for national roll out of the current programme in April 2015.
	November 2017	<b>4<sup>th</sup> Financial Framework</b> (this document) takes effect from 1 <sup>st</sup> January 2018 and supersedes all previous versions.

# Shared Commitments

The Troubled Families Programme is based on a common interest and ambition to transform the lives of this country's most complex families; to improve the services that work with them; and to ensure more efficient and effective use of public money for the long term.

These three objectives can be summarised as follows:

## *For families*

- To achieve significant and sustained progress<sup>1</sup> with up to 400,000 families with multiple, high-cost problems by 2020;
- To make work an ambition for all troubled families.

## *For local services*

- To transform the way that public services work with families with multiple problems to take an integrated, 'whole family approach';
- To help reduce demand for reactive services.

## *For the taxpayer*

- To demonstrate that this way of working results in lower costs and savings for the taxpayer.

As part of the sign up process for the Troubled Families Programme in 2015, all upper-tier local authority Chief Executives made a number of key commitments:

- To engage with an agreed number of families over the lifetime of the programme.
- To achieve measurable outcomes with an agreed total number of families over the 5 year period from 2015-16.
- To integrate and transform local public services.
- To evidence how the programme is delivering for families and in the transformation of public services through participation in the programme's National Impact Study, the submission of Family Progress Data and completion of the programme's Costs Savings Calculator.

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<sup>1</sup> Or achieve 'continuous employment' results

- To develop a Troubled Families Outcome Plan (TFOP) with the support of local partners and services, internal auditors and local strategic leaders.

Further detail relating to all of these commitments is provided in this Financial Framework.

In addition, every local authority will also be expected to make use of the Early Help Service Transformation Model and Toolkit to complete a self assessment and action plan at least twice more (in 2018-19 and 2019-20).

Adherence to these commitments may be taken into consideration when decisions are taken about the release of funding; payments may be reviewed and reduced or withheld if commitments are not fulfilled.

In return, the Department for Communities and Local Government (DCLG) Troubled Families Team commits to offer local authorities the following:

- The freedom and flexibility to prioritise the families of greatest concern to them and their partners locally, on the basis of cost and the potential benefits of an integrated whole family approach.
- The freedom and flexibility to design their own results framework (a Troubled Families Outcomes Plan), reflecting their local service transformation priorities and based on the principles laid out in this Financial Framework.
- Upfront attachment fees<sup>2</sup> for an agreed number of families<sup>3</sup> in each year of the programme and a results payment<sup>4</sup> for all families with whom they either achieve significant and sustained progress or move into continuous employment.
- An annual Service Transformation Grant, weighted towards their total number of families, to enable areas to identify a senior point of contact and the resource needed for oversight and coordination of an ambitious local programme of service reform.
- Increased provision of analysis and evidence back to local authorities from the national evaluation. This evidence will give local authorities and their partners improved information about the problems families face on entry to the programme, the impact of their local delivery on families and the fiscal benefits

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<sup>2</sup> £1000 per family

<sup>3</sup> If a family disengages before success has been claimed, this family must be replaced by another eligible family in order to ensure the local authority's overall commitments are met. No further attachment fee will be paid for this replacement family.

<sup>4</sup> £800 per family



being achieved.

- Constructive support and challenge from the national Troubled Families Team, based on shared learning and experience across local authorities and their partners.
- Ongoing work across government and with key delivery partners (e.g. Jobcentre Plus, the police, NHS England and Public Health England) to promote more effective information sharing and service integration.

# Early Help Service Transformation Maturity Model

Alongside delivering outcomes for families currently being supported by local authorities and their partners, the Troubled Families Programme also seeks to drive a transformation in the way relevant public services are delivered now and in the future.

The Early Help Service Transformation Maturity Model (STMM)<sup>5</sup> is designed to enable local authorities and their partners to make a robust assessment of the maturity of public service transformation. In describing the scope of the maturity model, the term 'early help' is being used in its widest possible sense to encompass services across the public sector delivering early intervention and support for complex families. These services will come from an array of providers such as the police, the voluntary and community sector, schools and health visitors in addition to the council's own services including social care and wider children's services. The model is a practical tool to help local authorities and their partners' evidence and assess their performance against six strands:

- The family experience of transformed services
- Leadership
- Strategy
- Culture
- Workforce development
- Delivery structures and processes

As the local authority receives a dedicated Service Transformation Grant from DCLG to drive service transformation, the local authority is responsible for ensuring that the assessment is rigorous and that the national Troubled Families Team is kept updated on its progress and completion. Given the scope of this ambitious reform programme, it is vital that the assessment is completed in conjunction with local partners, bringing together evidence sources and views from frontline staff and families, along with senior strategic partners, service providers and elected members. We expect all partners to co-complete and jointly own the assessment and to engage in a peer review of their assessment and action plan.

We expect every local authority to make use of the Early Help Service Transformation Model and Toolkit to complete a self assessment and action plan at least twice more (in 2018-19 and 2019-20).

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<sup>5</sup> <https://www.gov.uk/government/publications/troubled-families-early-help-service-transformation-maturity-model>

## **Data Maturity Model**

To complement the STMM, the national Troubled Families Team has developed a Data Maturity Model.<sup>6</sup> This model will help local authorities to assess the effectiveness of their data systems; to plan their next steps; benchmark their progress against other local authorities; and to advance the way data is managed and used by the local authority and their partners.

The Data Maturity Model is an appendix to the STMM and should be used in a similar way to assess a local authority's current position, to test this assessment and to agree an action plan with all partners.

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<sup>6</sup> <https://www.gov.uk/government/publications/troubled-families-early-help-service-transformation-maturity-model>

# Troubled Families Outcome Plans

Every local authority delivering the Troubled Families Programme must have in place a Troubled Families Outcome Plan (TFOP). This should be developed with the support of local partners and services, internal auditors and local strategic leaders and signed off through local governance arrangements.

This revised Financial Framework takes effect from 1<sup>st</sup> January 2018, and local authorities will need to take stock with their partners to understand how they want to give effect to changes in this framework in their own TFOP. Any changes or updates to TFOPs must be agreed and signed off through local governance arrangements. Once the new TFOP is agreed, local authorities may look back at the work that has taken place to date with families to understand what claims can be made. However all **claims must be valid at the point of submission** which means significant and sustained progress must be demonstrated against all relevant problems, with no regression evident against any of the six headline areas (see Principle 5 below).

Each local authority should ensure their TFOP reflects their local priorities and as such no two TFOPs will be the same. If a local authority wishes to make changes to their TFOP they should discuss these changes, and the reasoning behind them with the national Troubled Families Team. Once any changes are implemented the latest version of the TFOP must be submitted to the national Troubled Families Team and this version will be used for spot check purposes.

In the simplest terms, a TFOP should set out what each local authority and its partners consider to be successful outcomes – measured on a family by family level – against the programme’s six headline problems: crime and anti-social behaviour; poor health; domestic violence and abuse; children who need help; poor school attendance and unemployment.

The definition of these outcomes should be inextricably linked to local service transformation goals: the desired family level outcomes should in aggregate help achieve a local authority’s broader strategic aims and those of their local partners. For example, this could be inclusive growth through improved employment and skills; reduced demand on reactive services (e.g. police call outs, A&E admissions); and better value for money. We expect these transformational goals to become more defined and mature over time as the fiscal benefits of an integrated whole family approach start to accrue to the local authorities and their partners.

The Troubled Families Outcomes Plan will provide a local area-wide set of success measures applicable to all families, from which the outcomes and measures relevant to each family may then be drawn. For example, if a family has a debt problem, there is domestic violence and unemployment at the point that the family are engaged on the programme, then relevant outcomes measuring

success across all these issues would be drawn from the local authority's Troubled Families Outcomes Plan and form the goals against which significant and sustained progress would be judged for this family. The purpose of these local plans is three-fold:

1. To lay out **what each local authority and their partner agencies aim to achieve with each family** in regard to the six headline areas the programme aims to tackle; and how this supports wider **service transformation** objectives (i.e. how these 'per family' outcomes support broader, area-wide goals of demand reduction or fiscal savings);
2. To provide a basis against which each local authority can determine when **significant and sustained progress** has been achieved and, therefore, when a results claim may be made for the family; and
3. To provide a framework against which local authority **Internal Auditors** (and the national Troubled Families Team's 'spot checks') may establish whether a result is valid.

There are ten key principles that all TFOPs should reflect:

### **Principle 1- The purpose of TFOPs**

The purpose of a Troubled Families Outcomes Plan is to provide a concise and clear account of the goals that each local authority strives to achieve with its troubled families and against which success claims may be measured and verified. It should reflect the local area's local service transformation ambitions in terms of reducing demand for, and dependency on, services in the long term and in improving efficiency and outcomes for families. It should not be a complex, bureaucratic process.

### **Principle 2- Focus on outcomes**

Troubled Families Outcomes Plans should focus on the demonstration of outcomes, rather than inputs, processes and outputs. For example, the completion of a training course or the application of a particular intervention would be a process or input, whereas the outcome should focus on the measurable change achieved by the family as a result.

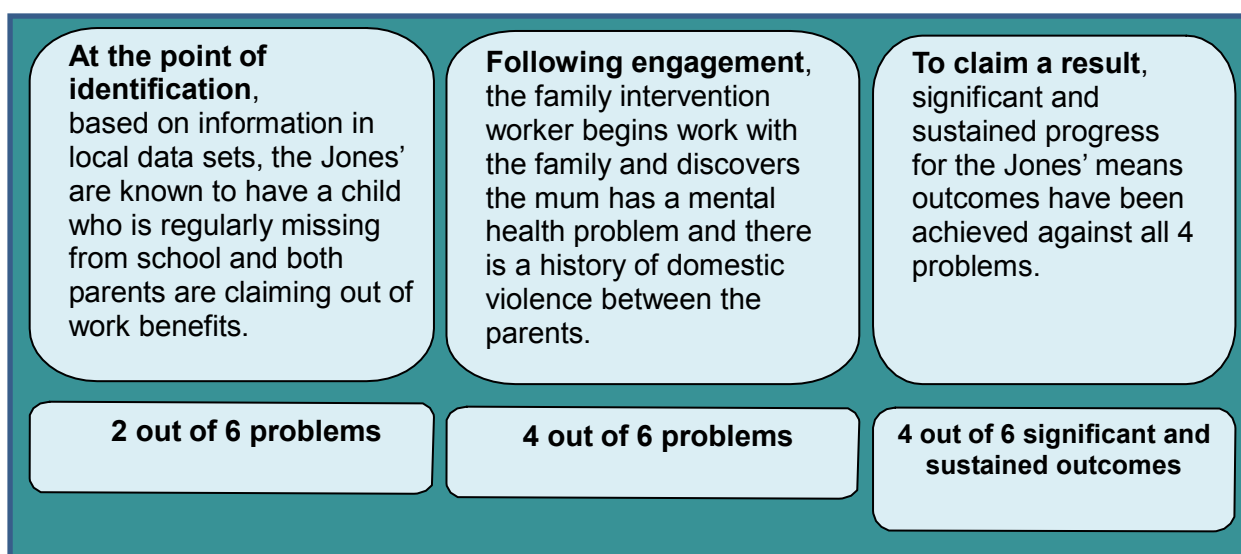
### **Principle 3- Information sharing**

Existing information sharing limitations should not be the starting point in setting outcomes. These limitations should not constrain local ambitions for families and services. Part of the programme's service transformation objectives should be to ensure that information follows ambition – rather than the opposite.

## Principle 4- Progress against all headline problems

As some family problems may not be evident at the point of identification and only become apparent when trust has been established with the family (e.g. domestic violence and abuse) the relevant outcomes within the Troubled Families Outcomes Plan should be revisited at this later point, when a fuller picture of the family is known.

**Figure 1: Principle 4**



## Principle 5- Regression

Where some problems are not present within a family at the point of engagement (e.g. the adults are in work and therefore worklessness is not an issue), the local authority does not need to demonstrate significant and sustained progress against this problem to claim a result. However, the local authority should ensure that the family's status has not regressed before a claim is made – i.e. the family should not have developed one of the six headline problems, where it was not a problem at engagement at the point of claim. (For example, if there were no anti-social behaviour problems prior to engagement and there was an incident of anti-social behaviour by the family during the period between engagement on the programme and when a claim is planned to be submitted, the claim cannot be made).

There may be a small number of exceptions to this principle. In some cases, outcomes achieved may appear to represent regression on face value, but could actually represent a significant positive improvement in the family's circumstances.

An example might be where there has been a history of domestic violence and abuse in the family; the victim reports the violence and, as a result, the perpetrator is convicted of an offence for these crimes. On face value, the number of proven offences in the family has increased, but the safety of the family has immeasurably improved.

Similarly the development of a health problem may be beyond the family or the service's control in some cases. In such cases, the effective management and appropriate use of health services to receive treatment will be sufficient to satisfy this principle.

In these exceptional cases, a claim for significant and sustained progress may still be made, provided the claim is validated with local authority Internal Auditors and evidence could be provided to the national Troubled Families Team as part of any subsequent 'spot check' process.

### **Principle 6- School attendance**

The Department for Education expects that all school registered children should attend all available sessions required by the school except where a statutory exception applies.<sup>7</sup> This applies equally to children in the Troubled Families Programme. That is why local Troubled Families Outcomes Plans (TFOPs) should set a locally-determined threshold for school attendance at which point a claim may be made, which should be framed within an ambition of regular attendance for all children.

In addition, local TFOPs can include a 'progress outcome' for school attendance. This approach allows local authorities to reward distance travelled in specific cases where the child started from a very low base. The national team will want to understand the approach taken to ensure that the level of ambition remains high for every child on the programme

Local authorities should set out their approach clearly in their local TFOPs which should be agreed in consultation with educational professionals nominated by the local authority, such as head teachers, educational welfare officers or other senior education representatives. Educational attendance measures in a local authority's TFOP will also need to be signed off at Early Help/Partnership Boards with appropriate (strategic) representation from educational professionals.

### **Principle 7- Partnership support**

As far as possible local authorities should develop and agree outcomes (and the datasets used to measure these outcomes) with local partners in the relevant public

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<sup>7</sup> If a child reaches an age where they are no longer required to attend school during the course of the intervention then a claim can only be made if they make the transition into some form of education, training or employment.

service areas. For example, health outcomes should be developed and agreed with local health partners and with reference to the Public Health and NHS Outcomes Frameworks and employment outcomes should be developed and agreed with local Jobcentre Plus District Managers, with reference to local skills, job market and growth objectives.

### **Principle 8- Employment**

Where unemployment is a problem for a family at the point of engagement, an adult in the family does not have to secure continuous employment in order for the local authority to make a claim for significant and sustained progress. Instead, in these cases, as a minimum, a family should demonstrate significant and sustained progress towards work.<sup>8</sup> For example, this might include outcomes such as achieving a recognised vocational qualification, undertaking significant relevant work experience over a sustained period of time or successful completion of an apprenticeship. Consideration should also be given to how other problems within the family might be impacting the ability of the family to find employment. This progress should be undertaken with a view to securing work ultimately and a 'subsequent continuous employment' outcome may be reported in these cases (though no claim for payment can be made, see page 25).

Employment should be an aspiration for all the families on the programme. Employment may not be immediately achievable for some families, but, with support from their keyworker and Troubled Families Employment Advisors, significant progress towards work can be made. However, there may be some exceptional cases where those claiming Carer's Allowance only (i.e. not in receipt of any income-related benefits) do not need to demonstrate progress toward work. In these cases worklessness is not considered a problem for the family. This should be decided on a case by case basis and will only apply to a small number of families eligible for the programme. In most cases consideration should be given to what support is needed to help a family be work ready in the future.

### **Principle 9- Sustainment periods**

The periods of sustainment for outcomes may vary between local authorities, reflecting local priorities and evidence, but they should be meaningful. Most local authorities have set a minimum of six months to demonstrate sustained progress, and local authorities who set shorter sustainment periods can expect to be challenged on their rationale. We expect the period of sustainment to reflect the point at which the evidence suggests positive progress has been, and will continue to be, maintained. The school attendance outcome should be demonstrated across at least three consecutive terms.

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<sup>8</sup> To claim significant and sustained progress outcomes against all other problems present within the family must be evidenced.



## **Principle 10- TFOP development**

A Troubled Families Outcomes Plan should be a living document. Over the course of the programme, the plans should be refined to reflect emerging service transformation priorities and respond to the evidence provided on local impact and family needs. While outcomes may change, levels of ambition should only increase. If changes to the TFOP are made, the latest version should be submitted to the national Troubled Families Team. Our expectation is that current local outcomes plans will also be published.

This principle intends to provide the flexibility to measure success in a way which reflects the service transformation and costs reduction priorities of each local authority and its partners. This approach provides the scope to update and refresh outcome measures to reflect changes in delivery and information sharing arrangements over time. Outcome measures may increase in their ambition as the programme progresses and local authorities can expect to be robustly challenged on any proposed reduction in ambition.

# Identifying Families

The Troubled Families Programme has led the way in the first systematic identification of families with multiple high cost problems across England.

The inclusion of families into the programme is based upon a cluster of six headline problems. Below these problems sits a basket of indicators, suggested referral routes and information sources, which should be used to identify families with these problems. While the headline family problems on which the programme focuses are unlikely to change significantly, the indicators and information sources underneath are designed to be flexible and can be updated over the course of the programme.

**To be eligible for the Troubled Families Programme, each family must include dependent children<sup>9</sup> and have at least two of the following six problems:**

1. Parents or children involved in crime or anti-social behaviour.
2. Children who have not been attending school regularly.
3. Children who need help: children of all ages who need help, are identified as in need or are subject to a Child Protection Plan.
4. Adults out of work or at risk of financial exclusion or young people at risk of worklessness.
5. Families affected by violence against women and girls
6. Parents or children with a range of health problems.

While families may be identified as eligible for the programme on the basis of two problems, the information available at the point of identification may not reflect the entirety of each family's complex problems. Some problems, such as domestic violence or mental illness, may be hidden from public services until work begins with the family and the full extent of their need is uncovered. In the first Troubled Families Programme, families who met three eligibility criteria were found, on average, to actually have nine significant problems on entry to the programme.<sup>10</sup>

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<sup>9</sup> For the purposes of the programme, a dependent child is a person aged 0-15 in a household or aged 16-18 in full-time education, in training or unemployed and living in a family with his or her parent(s). Non-dependent children in families are those living with their parent(s), and either (a) aged 19 or over or (b) aged 16 to 18 who are not in full-time education or who have a spouse, partner or child living in the household. Such children are often young adults, but may be older.

<sup>10</sup> <https://www.gov.uk/government/publications/understanding-troubled-families>

The formula for identifying families allows for a level of discretion which should be exercised reasonably. Local authorities should identify families across all six problems and ensure the programme's resources are being used to best effect. We expect areas to be using this programme to drive new ways of working across a broad and complex cohort of families so their approach to identification should reflect this ambition. Families should be prioritised for inclusion in the programme on the basis of the following:

- They are families with multiple problems who are most likely to benefit from an integrated, whole family approach; and
- They are families which incur the highest cost to the public purse.

While the detail of this prioritisation should be agreed locally, the regular collection and publication of evidence collated via the programme's National Impact Study; the submission of Family Progress Data; and the completion of the Cost Savings Calculator for every local authority will provide a form of accountability. These datasets will reveal the types of families and problems that local authorities and their partners are prioritising.

### **Timeframe for identifying families**

As part of the roll out of the 2015-2020 programme, a group of 51 early starter authorities began delivery from September 2014 and a further group of 62 began delivery from January 2015. The rest of the country joined the programme from April 2015, with four making a late start in September 2015. Families can be counted as eligible where they meet the eligibility criteria from the area's programme start date onwards, irrespective of whether they were already receiving a targeted family intervention. However, no results may be claimed for successes achieved with families prior to this date. If a result was claimed for successes achieved with families under the first programme (2012- 2015), no result may be claimed for the same family under the current programme.

### **Families with No Recourse to Public Funds**

Local authorities have reported that some families they identify have no recourse to public funds. These families would not necessarily be prevented from receiving support from this programme but further detail on the rules that apply are provided at **Annex A**.

### **Refugee Resettlement Programme**

If a family has been part of the resettlement programme we would not expect them to be included within the Troubled Families Programme's cohort. Public funding has already been made available for these families via the resettlement programme.

Although these families are not eligible for a results payment under the programme,

this should not have a bearing on the service that the family receive, which should be tailored to their needs.

# Age Thresholds for Eligibility and Measuring Results

The Troubled Families Programme aims to improve outcomes for children and intervene earlier in families with problems; all eligible families must include dependent children. For the purposes of the programme, a dependent child is a person aged 0-15 or aged 16-18 and in full-time education and / or training and / or unemployed and living with his / her family.

Family Problem	Age Threshold
If a child is involved in crime or anti-social behaviour...	...the relevant family member should be between 10 <sup>11</sup> and 18 years old. If 18 or over, the family member is considered an adult for these purposes.
If a child or young person has not been attending school regularly...	...the relevant family member should be in suitable <i>full-time</i> education, if the child is under 16 years old. <sup>12</sup>  This rises to 25 years old if the child or young person is under an Education, Health and Care plan or currently has a statement of special educational needs
If a young person is not in education, training or employment...	...the relevant family member should be 16-18 years old.
If a child has been identified / assessed as needing early help; or is a child in need under section 17, Children Act 1989; or is a child who has been subject to enquiry under section 47, Children Act 1989...	...the relevant family member should be under 18 years old. <sup>13</sup>

<sup>11</sup> <https://www.gov.uk/age-of-criminal-responsibility>

<sup>12</sup> or last Friday in June if they will turn 16 by the end of the school holidays.

<sup>13</sup> Working Together to Safeguard Children defines a child as anyone who has not yet reached their 18th birthday

(see: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/281368/Working\\_together\\_to\\_safeguard\\_children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/281368/Working_together_to_safeguard_children.pdf))

<p>If an adult is in receipt of out of work benefits; or an adult is claiming Universal Credit and subject to work related conditions...</p>	<p>...the relevant family member should be 18 years or over. However, there are a small number of exceptions whereby 16 and 17 year olds can claim the following benefits under specific circumstances: Jobseeker's Allowance, Employment and Support allowance and Carer's Allowance.</p>
<p>If a person is experiencing or perpetrating domestic violence ...</p>	<p>...the relevant family member should be 16 years old or over. If under 16 years old, violence or abuse should be captured as part of youth crime or children who need help indicators.</p>

# Working with Families

The Troubled Families Programme encourages local authorities and their partners to work in a new way for families with multiple problems, taking an integrated, whole family approach.

There is no one right way to work with families and each family will need a different approach depending on their circumstances. Every local authority and their partners will also choose to deliver their services differently to suit their local context. However the following four principles capture what the national Troubled Families Team mean by 'working with a family as part of the Troubled Families Programme'. These principles must apply to all families declared as 'engaged' under the programme and for which a claim is made:

- there will have been an assessment that takes into account the needs of the whole family;
- there is an action plan that takes account of all (relevant) family members;
- there is a lead / key worker for the family that is recognised by the family and other professionals involved with the family; and
- the objectives in the family action plan are aligned to those in the local authority's Troubled Families Outcomes Plan.

# Claims and Payment Terms

A results payment can be claimed by a local authority if it can demonstrate that an eligible family has either:

- 1. Achieved significant and sustained progress against all problems identified at the point of engagement and during the intervention; or**
- 2. An adult in the family has moved into continuous employment.**

## **Sustained and Significant Progress**

Descriptions and definitions of the outcomes and measures that constitute and demonstrate significant and sustained progress for all troubled families in each local authority should be agreed locally and set out in a Troubled Families Outcomes Plan.

## **Continuous Employment**

Worklessness is a problem found in many troubled families and achieving continuous employment can be transformative. Findings from the Troubled Families Programme's independent national evaluation found that an estimated 83% of families were receiving an out of work benefit on entry to the programme – compared with around 11% of the population nationally.<sup>14</sup>

In support of the Programme's focus on employment, the Department for Work and Pensions (DWP) provides a network of around 300 work coaches to act as Troubled Families Employment Advisors (TFEAs), based in local authorities. They support individuals in families to get on the path to work and boost the employment expertise of frontline work with families.

The movement of a family member into continuous employment often represents the culmination of significant and sustained progress across a range of outcomes for many families. For example, mental illness, substance misuse, offending behaviour, poor school attainment and experience of domestic violence and abuse are all well evidenced barriers to employment. To overcome these barriers, secure work, and maintain it for 13 or 26 weeks represents a major step forward for families.

This result has two parts:

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<sup>14</sup> <https://www.gov.uk/government/publications/understanding-troubled-families>



1. The movement off out of work benefits or the satisfaction of an earning threshold if in receipt of Universal Credit (UC) (see page 38), and
2. The sustainment of a period of continuous employment.

For the first part for the result, where family members are in receipt of UC, the family must satisfy the relevant earnings threshold. Troubled Families Employment Advisors will provide information about earnings thresholds to local authorities.

For the second part of the result, the length of time an adult must remain in work depends on the type of benefit they were receiving previously. These measurement periods reflect the DWP's previous approach with its own providers.

Benefit	Period of continuous Employment
Job Seeker's Allowance	26 weeks (out of the last 30 weeks)
Job Seeker's Allowance (ex-Incapacity Benefit)	13 consecutive weeks
Employment and Support Allowance	
Income Support	
Incapacity Benefit	
Carer's Allowance	
Severe Disablement Allowance	

For families who move onto UC, the data sharing arrangements with the DWP are under development. In the interim, arrangements should be agreed locally with Troubled Families Employment Advisors to capture the right data.

### Payment Terms

The majority of the funding is available on a per family basis for the achievement of significant and sustained progress or continuous employment outcomes. This is paid to local authorities in two parts – an upfront attachment fee and a results-based payment.

A results-based payment of £800 will be offered for each family for whom the local authority claims to have either:

- (a) achieved significant and sustained progress, or
- (b) had an adult move into continuous employment.

The opportunity to claim results is offered on a regular basis through a rolling claims window that is open for the majority of the year. Claims must be submitted through the Troubled Families Information System (TFIS). The local authority's internal audit service should check and verify at least a representative sample of results for each claim before it is made. All claims made must be valid on the date that they are submitted and must be certified by a section 151 officer.

If a family has achieved significant and sustained progress and a claim for a results payment is made, the local authority may not claim a further result payment if an adult in the family subsequently moves off benefits and into continuous employment. This would constitute double payment for the same family. However, a field is available on the results claim form to record that a 'subsequent continuous employment' outcome has been achieved. While no additional funding will be paid for this outcome, the results will be published to evidence each area's overall success in terms of employment outcomes for families.

Local authorities may not receive further funding for a family for whom any payment has already been received as part of the first Troubled Families Programme. While it remains in the wider interests of local authorities and their partners to ensure the improved outcomes of these families are sustained and they do not deteriorate, outcomes achieved with these families should not be counted twice. **The estimated 400,000 families supported by the current Troubled Families Programme are in addition to the 120,000 families supported by the first programme.**

# Parents or children involved in crime or anti-social behaviour

The Troubled Families Programme works with families who have significant problems and with some families who also cause problems.

The eligibility criteria focus on youth crime, anti-social behaviour and families where there is an adult offender with parenting responsibilities. This reflects the evidence that a significant factor in youth offending is a young person having parents who have committed criminal offences or anti-social behaviour and that the children of offenders are also more likely to be excluded from school and twice as likely to suffer from behavioural and mental health problems.

The indicators below also offer the flexibility for criminal justice professionals to nominate parents and children where there is a potential crime problem, but no proven offence and they believe this could be a sign of wider family problems. This may be particularly helpful when identifying families where there is strong intelligence about a family’s involvement in activities such as gang and youth violence or serious organised crime, but no proven offence.

Indicators	Suggested Information Source
<i>The family includes at least one of the following...</i>	
A child <sup>15</sup> who has committed a proven offence <sup>16</sup> in the previous 12 months.	Information provided by Youth Offending Teams and the police.
An adult or child who has received an anti-social behaviour intervention (or equivalent local measure) in the last 12 months.	Information provided by the police, anti-social behaviour teams and housing providers.
An adult prisoner who is less than 12 months from his / her release date and will have parenting responsibilities on release.	Information provided by probation providers <sup>17</sup> and prisons.

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<sup>15</sup> under 18 years old

<sup>16</sup> A proven offence is one where a formal outcome is given, either in or out of court.

<sup>17</sup> National Probation Service, Community Rehabilitation Companies and other providers of probation services.

Indicators	Suggested Information Source
<i>The family includes at least one of the following...</i>	
An adult who is currently subject to a licence or supervision in the community, following release from prison, and has parenting responsibilities.	Information provided by probation providers <sup>18</sup> and prisons.
An adult currently serving a community order or suspended sentence, who has parenting responsibilities.	Information provided by probation providers. <sup>19</sup>
Adults and children nominated by professionals because of their potential to offend or offending behaviour are of equivalent concern to the indicators above.	Referrals from the police, multi-agency gang units, probation providers, National Crime Agency, Integrated Offender Management Teams and CHANNEL coordinators. <sup>20</sup>

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<sup>18</sup> As above

<sup>19</sup> As above

<sup>20</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/118194/channel-guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118194/channel-guidance.pdf)

# Children who have not been attending school regularly

Suitable full time education is not only an essential pre-requisite to better attainment, it is also strongly associated with a broad range of positive outcomes including reducing the risk of worklessness, youth crime and anti-social behaviour.

School registered children should attend all available sessions required by the school except where a statutory exception applies. This applies equally to children in the Troubled Families Programme and this should be acknowledged in TFOPs.

Accordingly, the programme sets out to tackle school absence by requiring significant improvement in attendance, sustained across three consecutive terms. Local Troubled Families Outcomes Plans (TFOPs) should set a locally-determined threshold for school attendance at which point a claim may be made, which should be framed within an ambition of regular attendance for every child.

When assessing eligibility for inclusion in the programme, absences which are not due to a statutory exception<sup>21</sup> (including those which have not been authorised by the school in advance due to exceptional circumstances), should always be included when assessing whether a child's school attendance represents a problem which should be reflected in a family's action plan.

Local authorities are not required to include absences which are covered by a statutory exception<sup>22</sup> (including those which have been authorised by the school in advance due to exceptional circumstances) when assessing whether a child's school attendance is a cause for concern. However, in some cases, key workers may assess that a child's incidence of these kinds of absence<sup>23</sup> indicates other issues within a family which need to be addressed (such as on-going, poorly managed health problems for example). Where this is the case, a child's overall level of absence may still be taken into account and reflected in a family's action plan.

In addition, local TFOPs can include a 'progress outcome' for school attendance which allows local authorities to reward distance travelled in specific cases where a child starts from a very low base. Local authorities should set out their approach clearly in their local TFOPs, which should be agreed in consultation with educational professionals nominated by the local authority, such as head teachers, educational welfare officers or other senior education representatives.

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<sup>21</sup> i.e. those absences which are generally referred to as 'unauthorised absences'

<sup>22</sup> i.e. those absences which are generally referred to as 'authorised absences'

<sup>23</sup> i.e. absences covered by a statutory exception, including those which have been authorised by the school in advance due to exceptional circumstances

Educational attendance measures in a local authority's TFOP will need to be signed off at Early Help/Partnership Boards with appropriate (strategic) representation from educational professionals. The national team will also want to understand the approach taken to ensure that the level of ambition remains high for every child on the programme.

### **Statutory exceptions**

Statutory exceptions (in which a child shall not be taken to have failed to attend school regularly) include:

- where a child is prevented from attending school due to sickness or unavoidable cause;
- where a child's absence from school is on a day exclusively set apart for religious observance by the religious body to which their parent belongs;
- where the local authority has a statutory duty to help the child attend school, but has failed to make any travel arrangements;
- where the school is a privately funded independent school and is not within walking distance of the child's home, and no suitable arrangements have been made by the local authority for them to board at or near the school or to attend a state-funded school closer to their home;
- where a child has no fixed abode, the parent's trade/business requires them to travel, the child has attended school as regularly as the nature of the trade/business permits, and (for children aged six or older) they have attended at least 200 sessions during the preceding 12 months; and
- where leave of absence from school has been granted by the school (see below).

### **Exceptional circumstances in which leave of absence from a maintained school may be granted**

Leave of absence from a maintained school may only be granted in advance by the head teacher, and only in exceptional circumstances. The National Association of Head Teachers (NAHT) included advice on the types of 'exceptional circumstances' in which it may be appropriate for leave to be granted in their guidance to school leaders (2014). Their guiding principles include:

- absence for bereavement of a close family member to attend funeral service, not extended leave;
- absences for important religious observances for the ceremony and travelling time, not extended leave;
- schools may wish to take the needs of the families of service personnel into account if they are returning from long operational tours that prevent contact during scheduled holiday time;
- schools have a duty to make reasonable adjustments for students with special

- educational needs or disabilities; and
- families may need time together to recover from trauma or crisis.

Indicators	Suggested Information Source
<i>The family includes at least one of the following...</i>	
<p>A child whose average attendance over the last three consecutive terms has not been regular.<sup>24</sup></p> <ul style="list-style-type: none"> <li>Where the absence has not been explained by statutory exceptions (including authorisation for exceptional circumstances).</li> <li>Where the level of absence – even where it is covered by statutory exceptions – is a cause for concern.</li> </ul>	<p>Information compiled locally for submission to the Department for Education (DfE) for the School Census (and Alternative Provision Census).</p> <p>Information provided by Education Welfare Officers.</p>
<p>A child who has received at least 3 fixed term exclusions in the last 3 consecutive school terms; or a child at primary school who has had at least 5 school days of fixed term exclusion in the last 3 consecutive terms; or a child of any age who has had at least 10 days of fixed term exclusion in the last 3 consecutive terms.</p>	<p>Information compiled locally for submission to the Department for Education (DfE) for the School Census (and Alternative Provision Census).</p> <p>Information provided by Education Welfare Officers.</p>
<p>A child who has been permanently excluded from school within the last 3 school terms.</p>	<p>Information compiled locally for submission to the Department for Education (DfE) for the School Census (and Alternative Provision Census).</p> <p>Information provided by Education Welfare Officers.</p>

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<sup>24</sup> What constitutes Irregular attendance should be determined in consultation with education professionals

<p>A child who is in alternative educational provision for children with behavioural problems.</p>	<p>Information compiled locally for submission to the Department for Education (DfE) for the School Census (and Alternative Provision Census).</p> <p>Information provided by Education Welfare Officers.</p>
<p>A child who is neither registered with a school, nor being educated in an alternative setting.</p>	<p>Information compiled locally from within the local authority</p>
<p>A child nominated by education professionals and/or lead practitioner/key worker as having school attendance problems of equivalent concern to the indicators above because he/she is not receiving a suitable full time education.</p>	<p>Referrals from teachers and education welfare officers (or lead practitioner/key worker notes).</p>



# Children of all ages who need help, are identified as in need or are subject to a Child Protection Plan

The Troubled Families Programme allows local authorities and their partners, using the indicators below, to identify a wide group of families who may benefit from an integrated whole family approach. The criteria are not restricted to families with school age children.

These include: children who have been identified or assessed as needing early help; children who have been identified as a 'child in need'; children subject to a Child Protection Plan or have been subject to Section 47 enquiries,<sup>25</sup> and children who are showing early signs of developmental need. This may include children experiencing or at risk of poor parenting, with developmental delay, including speech, language and communication needs, at risk of exploitation (including sexual exploitation), those with challenging behaviours and those previously accommodated and returning home from care. In all such cases, the social worker may put forward a family who they believe would benefit from an integrated whole family approach.

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<sup>25</sup> Under section 47 of the Children Act 1989

Indicators	Suggested information source
<i>The family includes at least one of the following...</i>	
<p>A child who has been identified as needing early help. This may include children below the threshold for services under section 17, Children Act 1989.</p>	<ul style="list-style-type: none"> <li>• Information from local authority early years foundation stage providers (e.g. Children’s Centres) about children who don’t take up the free early education entitlement, by cross-referencing a list of those children eligible with those who are not taking up the offer.<sup>26</sup></li> <li>• Information from local schools, early years providers, health visitors, academies and education welfare teams, Special Educational Needs Coordinators (SENCOs) or their equivalent about children identified in the School Census as having social, emotional and mental health problems.<sup>27</sup></li> <li>• Information from the police and Children’s Services (including youth services) about children who have been reported missing from home and identified as of concern.<sup>28</sup></li> </ul>

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<sup>26</sup> All three- and four-year-olds are entitled to 15 hours of free Early Years Entitlement per week. All two-year-olds who live in households which meet the eligibility criteria for free school meals are entitled to a free early education place, along with children who are looked after by the state. The two-year-old entitlement was extended to 40% of the least advantaged two-year-olds as of September 2014

<sup>27</sup> As of September 2014, the School Census code for social, emotional and mental health problems is SEMH

<sup>28</sup> For example, this may include local information following ‘safe and well’ checks carried out by the police or Independent Return Interviews.

A child who has been assessed as needing early help. <sup>29</sup>	Information from Children's Services or related multi-agency teams <sup>30</sup> about children who are: <ul style="list-style-type: none"> <li>• repeatedly assessed under section 17 or 47, of the Children Act 1989, but not deemed a child 'in need', or</li> <li>• subject to Early Help Assessments (or local equivalent).</li> </ul>
A child 'in need' under section 17, Children Act 1989.	Information provided by Children's Services
A child who has been subject to an inquiry under section 47, Children Act 1989.	Information provided by Children's Services
A child subject to a Child Protection Plan.	Information provided by Children's Services
A child nominated by professionals as having problems of equivalent concern to the indicators above.	Referrals <sup>31</sup> from schools, social workers, early years providers (including Children's Centres), health visitors, education psychologists, school Special Educational Needs Coordinators (SENCOs), Youth Offending Teams and the police.
A child identified as having a delay in speech language and communication skills. This can include children not reaching the threshold in the communication domain at the 2-2.5 year old health check carried out by health visitors.	Children identified in early years settings or by health professionals as having speech, language and communication needs. The need is primary (not linked to another impairment), and the child does not have an Education, Health and Care Plan.

<sup>29</sup> This may include children, who when assessed were deemed below the threshold for services under Section 17, Children Act 1989.

<sup>30</sup> For example, 'Team Around the Child', a 'Team Around the Family' or a 'Team Around the School'.

<sup>31</sup> Where there are concerns about children at risk of abuse or neglect, the existing referral route to local child protection teams should be followed in accordance with the statutory guidance - *Working together to Safeguard Children* <https://www.gov.uk/government/publications/working-together-to-safeguard-children>

<p>A child / family who is entitled, or has previously been entitled to 15 hours free early education for two-year-olds and has not taken this up.</p>	<p>Local authorities have access to lists of children who would potentially be eligible for the entitlement. From this they can work out the children that are not taking up the offer.</p>
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In September 2013, the Government announced 15 hours of free childcare for the 20% most disadvantaged two-year-olds in the UK. This was increased to the 40% most disadvantaged two-year-olds in the UK in September 2015. The parents must meet certain eligibility criteria<sup>32</sup> in order to access the offer, for example they must be able to claim certain benefits. Children are also eligible if they are looked after by a local authority; they have a current statement of special education needs (SEN)<sup>33</sup> or an Education, Health and Care Plan; they get Disability Living Allowance;<sup>34</sup> they have left care under a special guardianship order, child arrangements order or adoption order.

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<sup>32</sup> <https://www.gov.uk/help-with-childcare-costs/free-childcare-2-year-olds-benefits>

<sup>33</sup> <https://www.gov.uk/children-with-special-educational-needs>

<sup>34</sup> <https://www.gov.uk/disability-living-allowance-children>

# Adults out of work or at risk of financial exclusion or young people at risk of worklessness

The focus of the Troubled Families Programme on employment is one of its most powerful elements. Feedback from local authorities and their partners delivering the programme suggest it has a transformative impact not only on family outcomes, but also on the approach and design of local family services.

The programme's eligibility indicators also reach young people at high risk of worklessness and those experiencing problematic debt, particularly those who have financial responsibilities in their household.

Indicators	Suggested Information Source
<i>The family includes at least one of the following...</i>	
<p>An adult in receipt of out of work benefits,<sup>35</sup></p> <p>or</p> <p>An adult who is claiming Universal Credit and subject to work-related conditions.<sup>36</sup></p>	<p>An adult who is claiming Universal Credit and subject to work related conditions: All local authorities have access to the Department for Work and Pension's Automated Data Matching Solution (ADMS) for the Troubled Families Programme which provides information on legacy benefits such as JSA and ESA.</p> <p>However, for families who move onto Universal Credit (UC), the data sharing arrangements with the Department for Work and Pensions (DWP) are under development and DWP is exploring a mechanism to automate matching of Universal Credit data. In the interim, arrangements should be agreed locally with Troubled Families Employment Advisors to capture the right data.</p>

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<sup>35</sup> This includes adults in receipt of Employment and Support Allowance, Incapacity Benefit, Carer's Allowance, Income Support, Job Seekers Allowance and Severe Disablement Allowance.

<sup>36</sup> To be consistent with the Department for Work & Pension's approach, this includes adults required (i) to attend 'work focused interviews'; (ii) to meet 'work preparation requirements' (e.g. those with limited capability for work currently, but could make reasonable steps to prepare for work); and (iii) to proactively look for work (e.g. those expected to look and be available for work)

<p>A child who is about to leave school, has no / few qualifications and no planned education, training or employment.</p>	<p>Information drawn from Personal Learner Records<sup>37</sup> and the local authority's client caseload information system (or equivalent).<sup>38</sup></p> <p>Information collected by local schools, academies and alternative providers for the Department for Education's School Census and Alternative Provision and Youth Contract providers.<sup>39</sup></p> <p>Key Stage 4 data compiled by schools and academies at pupil level for the production of published school performance tables.</p>
<p>A young person who is not in education, training or employment.</p>	<p>Local authorities' client caseload information systems (or equivalent), which indicates whether young people have been identified as not in education, training or employment (NEET) or whether their activities are 'not known'.</p>
<p>Parents and families nominated by professionals as being at significant risk of financial exclusion. This may include those with problematic / unmanageable levels and forms of debt and those with significant rent arrears.</p>	<p>Referrals from organisations specialising in debt and finance, such as the Money Advice Service, Jobcentre Plus and housing providers.</p>

## Universal Credit and the Administrative Earnings Threshold (AET)

The aim of Universal Credit (UC) is to help make work pay and ensure that people can keep more of their earnings as they progress in work.

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<sup>37</sup> All 16-18 year olds should have a Personal Learner Record (PLR) and most local authorities already have access to this information as registered providers of education and training.

<sup>38</sup> Local authorities are required to encourage young people to participate in education and training and identify those who are not engaged. For most areas, a key part of this is collecting good information about young people with few/ no qualifications and many record these details on a Client Caseload Information System (or equivalent) and others have arrangements in place to gather attainment data from providers.

<sup>39</sup> <https://www.gov.uk/government/publications/youth-contract-16-and-17-year-olds>

In-work earnings progression sits at the heart of UC – it is an in and out of work benefit. This is a key transformational element: for the first time, claimants who are in low-paid work or live in low income households will be supported and encouraged to earn more and become more independent and self-sufficient.

The Administrative Earnings Threshold (AET) has been established to ensure that only those claimants on very low pay are subject to more intense DWP support.

Current AET has been set at £338 per month for a single person and £541 for couple – based on gross taxable pay. The AET is defined as follows:

- For single people: £5.00 plus the applicable amount of the personal allowance in a jobseeker's allowance for a single person aged 25 or over; or
- For couples: £10.00 plus the applicable amount of the personal allowance in a jobseeker's allowance for a couple where both members are aged 18 or over.

*NB: there is a separate earnings threshold (of £272pcm) for young people under 25 and apprentices that is not linked to the AET. Nor does the AET apply to self-employed earnings.*

As the Work Programme was designed for a legacy welfare system, some programmes have used an earnings threshold based on the AET as a proxy for a traditional 'off unemployment benefit' measure. The Troubled Families Programme has always mirrored these outcomes and thresholds.

In order for a local authority to be able to claim an outcomes payment, an adult in a troubled family must reach these earnings thresholds continuously for 26 weeks out of the last 30 weeks where they are required to look for employment (i.e. JSA-type benefits). Those who are not required to actively seek employment (i.e. ESA / IS-type arrangement) must reach the earnings threshold continuously for 13 weeks.

The Welfare Reform and Work Act 2016 froze Work Age benefits, including JSA rates, until 2020. Any queries on UC and AET should be directed to local TFEAs.



# Families affected by violence against women and girls

The term 'Violence Against Women and Girls' encompasses domestic abuse, so-called 'honour-based' violence, stalking and sexual violence, and the Government's response to all of these crimes are encompassed within the Ending Violence Against Women and Girls Strategy.<sup>40</sup> These crimes disproportionately impact women. However, men can also be victims of violence and abuse and the approach set out in the strategy applies to all victims of these crimes. Domestic violence and abuse is a form of violence against women and girls and is a damaging and widespread problem for many of the families on the Troubled Families Programme. The consequences of this violence and abuse are also felt across health, police, housing and Children's Services budgets.

Defining the most useful indicators and capturing the most relevant information sources that capture violence against women and girls, including domestic violence and abuse, is not straightforward. This violence and abuse often goes unreported and so agencies must be able to identify what is often considered 'hidden harm'. The suggested information sources below give local authorities the flexibility to draw upon the intelligence of specialist agencies, rather than relying solely on reporting mechanisms. This means the identification of families is likely to lend itself to referral-based models, rather than the cross-referencing of larger datasets.

The Troubled Families Programme applies the following agreed cross-government definitions of domestic violence and abuse: 'any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional.' Domestic violence and abuse also includes so-called 'honour-based' violence (which includes female genital mutilation and forced marriage) and can include stalking. So called 'honour based' violence is a crime or incident which has or may have been committed to protect or defend the 'honour' of the family and/or community, and can be committed by individuals or multiple perpetrators. Sexual violence is defined as any sexual act or attempted act committed against someone without their consent, regardless of the relationship to the victim.

Individuals who are victims of violence and abuse may be any gender, adults or children. Where a child is a victim of violence or abuse, for the purposes of eligibility

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<sup>40</sup> <https://www.gov.uk/government/publications/strategy-to-end-violence-against-women-and-girls-2016-to-2020>

for the Troubled Families Programme, they should be included as a 'Child who needs Help'. Where the perpetrator is a child, for the purposes of eligibility for the programme, they should also be included in the 'Child who needs Help' criteria.

Indicator	Suggested Information Source
<i>The family includes at least one of the following...</i>	
A young person or adult known to local services has experienced, is currently experiencing or is at risk of experiencing domestic violence or abuse.	Referrals from local domestic violence and abuse services or professionals, such as Independent Domestic Violence Advisors (IDVAs), housing providers, health services, the police, Children's Services and Youth Offending Teams.
A young person or adult known to local services has experienced, is currently experiencing or is at risk of experiencing sexual violence or abuse.	Referrals from local sexual violence and abuse services or professionals, such as Independent Sexual Violence Advisors (ISVAs), health services, the police, Children's Services and Youth Offending Teams.
A young person or adult known to local services has experienced, is currently experiencing or is at risk of experiencing 'honour-based' abuse.	Referrals from local honour-based violence services or safeguarding professionals, such as health services, the police, and Children's Services.
A young person or adult who is known to local services as having perpetrated an incident of domestic violence or abuse in the last 12 months.	Local police data and intelligence. Referrals from local domestic violence and abuse services or professionals, such as Independent Domestic Violence Advisors (IDVAs), housing providers, health services, the police, Children's Services and Youth Offending Teams.

<p>A young person or adult who is known to local services as having perpetrated an incident of sexual violence or abuse in the last 12 months.<sup>41</sup></p>	<p>Local police data and intelligence. Referrals from local sexual violence and abuse services or professionals, such as Independent Sexual Violence Advisors (ISVAs), health services, the police, Children’s Services and Youth Offending Teams.</p>
<p>A young person or adult who is known to local services as having perpetrated an incident of so-called ‘honour-based’ violence or abuse in the last 12 months.<sup>42</sup></p>	<p>Local police data and intelligence. Referrals from local honour-based abuse services or professionals, such as safeguarding professionals, health services, the police, Children’s Services.</p>
<p><i>The household or a family member has...</i></p>	
<p>Been subject to a police call out for at least one domestic incident, including for so-called ‘honour-based’ abuse, in the last 2 months.<sup>43</sup></p>	<p>Information from the police, Multi-Agency Safeguarding Hubs (MASH) and Multi-Agency Risk Assessment Conferences (MARAC).</p>

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<sup>41</sup> The time limitation is to ensure the data share is proportionate and in line with the requirements of the Data Protection Act. However, local authorities and their partners (particularly the police) can agree alternative local arrangements whereby information covering a longer period of time is shared where relevant. This is permissible and in line with the programme’s broader policy objectives.

<sup>42</sup> As above

<sup>43</sup> As above

# Parents and children with a range of health problems

Health problems for troubled families are costly and have a significant impact on the whole family.

The programme seeks to reach families with a range of physical and mental health problems which are being poorly managed within the family.

The indicators and information sources below are the outcome of extensive discussions with local authorities, the Department of Health, Public Health England and NHS England. They reflect three main health priorities: mental illness, substance misuse and vulnerable new mothers. Improved data sharing is integral to success in these areas as well as a much deeper and wider programme of integration and service transformation to improve health outcomes for families.

Indicator	Suggested Information Source
<i>The family includes at least one of the following...</i>	
An adult with mental health problems who has parenting responsibilities or a child <sup>44</sup> with mental health problems. <sup>4546</sup>	Referrals from Community Mental Health Services, Child & Adolescent Mental Health Services, local GPs, education psychologists and school Special Educational Needs Coordinators (SENCOs).
An adult with parenting responsibilities or a child with a drug or alcohol problem.	Information drawn from the National Drug Treatment Monitoring System.  Referrals from local GPs, the police or local substance misuse support services.

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<sup>44</sup> This includes children with conduct disorders.

<sup>45</sup> The adult or child does not need to be in receiving specialist treatment.

<sup>46</sup> This report provides information on recognising and working with young people with mental health in schools:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/508847/Mental\\_Health\\_and\\_Behaviour\\_-\\_advice\\_for\\_Schools\\_160316.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508847/Mental_Health_and_Behaviour_-_advice_for_Schools_160316.pdf)

<p>A new mother who has a mental health or substance misuse problem and other health factors associated with poor parenting. This could include mothers who are receiving a Universal Partnership Plus service<sup>47</sup> or participating in a Family Nurse Partnership.</p>	<p>Referrals from health visitors, midwives, family nurses or local GPs.</p> <p>Information from the Local Child Health Information System.</p>
<p>Adults with parenting responsibilities or children who are nominated by health professionals as having any mental and physical health problems of equivalent concern to the indicators above. This may include unhealthy behaviours, resulting in problems like obesity, malnutrition or diabetes.</p>	<p>Referrals from health professionals, including GPs, midwives, health visitors, family nurses, school nurses, drug and alcohol services and mental health services.</p>

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<sup>47</sup> Universal Partnership Plus is a service offered by a health visiting team and local services to support families with children under 5 years old who have complex issues that require more intensive support.

# Evaluation

The national evaluation of the Troubled Families Programme, undertaken jointly by DCLG with local authorities and their partners, will be an important legacy of the programme. The programme is funded until 2020, with the evaluation set to measure family outcomes up to 2022 to understand the programme's ongoing impact.

In order to evidence changes in outcomes for families, the impact of the programme and resultant cost savings, all local authorities are asked to provide four main forms of information. This set of information is vital in tracking success and holding the programme accountable nationally:

- **National Impact Study (NIS):** The National Impact Study provides a quantitative assessment of the impact of the programme, by matching data about individuals in the Troubled Families Programme to national administrative datasets held by government departments (e.g. Police National Computer, National Pupil Database and DWP's benefits systems). The National Impact Study uses the details supplied by local authorities of families being worked with as part of their local Troubled Families Programme and a comparison group of similar families who are not receiving the programme's services. Analysis of the data is made every six months throughout the course of the programme.
- **Family Progress Data (FPD):** For those key indicators that are not available in national datasets, local authorities need to submit information on thirteen indicators for all the families they are working with pre-intervention and during intervention.
- **Costs of local delivery:** Information relating to costs of delivering targeted integrated whole family services in each area for use in the cost savings calculations that are built into the Troubled Families Information System and automatically generated for each local authority based on outcomes from NIS / FPD compared to local costs.
- **Troubled Families annual online staff survey:** All areas will be asked to undertake an online survey about their approach to delivery of the Troubled Families Programme, and to give access to a keyworker survey for keyworkers in their area. This is conducted by Ipsos Mori. In addition, some local authorities are involved in other parts of the national evaluation of the programme. For example nineteen authorities are involved in facilitating a face to face survey of families in their area which will interview over 1,000 families at the start of and post-intervention. Nineteen authorities (over the

course of the programme) will participate as case study areas to understand how the programme is being delivered locally, the level and form of service transformation, and how family intervention is working from the perspective of families.

## **The National Impact Study**

To minimise the amount of data local authorities are asked to collect on families, to track family outcomes nationally and locally throughout the programme, and to provide the most robust assessment of impact possible, the programme maximises the use of the National Impact Study (NIS).

Given the importance of understanding the impact of delivery both nationally and locally, participation in NIS has been a requirement for participation in the Troubled Families Programme from the programme's inception. If local authorities do not fulfil this commitment then future Service Transformation Grant funding may be withheld. From the halfway point of the 2015-2020 programme, data management should be sufficiently advanced to meet this commitment and compliance will be more closely scrutinised in decisions about funding for the remaining years of the programme.

NIS makes a quantitative assessment of the impact of the programme, by matching data about individuals in families to national administrative datasets held by government departments (e.g. Police National Computer and DWP's benefits systems). It provides an on-going measure of changes in family outcomes across all six programme domains and will estimate the added value of the programme by comparing families receiving intervention with comparison families not on the programme. We are undertaking further analytical work to ensure that the comparison group data is not distorted by issues relating to selection or contamination (families in the comparison group receiving services similar to the Troubled Families Programme as a result of the programme's goal to drive wider local public service transformation). This will allow us to draw firmer conclusions about net impact of the programme.

The establishment of a robust comparison group will inform our programme of work on cost benefit analysis by attaching cost savings to impact shown from the national administrative datasets. It is our intention that, by 2019/20, there will be individual cost benefit analyses for each of the 150 participating local authority areas showing costs avoided and savings made to the public purse in regard to their local Troubled Families programme.

All local authorities must submit data for NIS on a twice yearly cycle. Data is uploaded by local authorities to the Troubled Families Information System (TFIS). Findings will be provided throughout the delivery of the programme via TFIS to show the impact of delivery in each upper-tier local authority. TFIS reports on over sixty measures for each yearly cohort and allows comparison of outcomes to

nearest statistical neighbours.

The information required for NIS from local authorities comprises the following types of information about all families assessed for inclusion in the programme:

- personal identifiers of individuals in all families assessed for eligibility (e.g. name, date of birth, gender and postcode);
- eligibility problems met (as per this Financial Framework);
- status of intervention (e.g. whether eligible, start / end date of intervention); and
- available unique identifiers (e.g. National Insurance Numbers, Unique Pupil Numbers).

All local authorities have a template setting out the information to be provided directly to the Office of National Statistics on a six-monthly basis.

### **Family Progress Data**

As outlined above, participation in NIS will provide outcomes information across crime, education, child protection and employment for families on the programme. Work is ongoing with NHS Digital and the Department for Health to add health outcomes. However, there are a number of family problems that are not held in any national administrative datasets but which are important indicators of family progress. This includes issues like domestic violence and abuse, anti-social behaviour and housing problems.

To ensure these important gaps are filled, local authorities collect and submit information about all individuals in families with whom they are working across this list of measures on a twice yearly basis.

For the findings in the cost savings analysis to be credible and for the FPD data to be compatible with NIS, information must be collected and provided for all families supported by the programme. FPD data on families and individuals need to refer to the same families and individuals for which data is submitted to NIS. These are all measures on which local authorities will be collecting information for the identification of families and measurement of significant and sustained progress. Funding has been provided through the Service Transformation Grant to support the local collection and submission of this information.

### **Cost Savings Calculator**

In the context of continued public spending restraint and the imperative that outcomes for families are improved for the long-term, understanding the fiscal benefits achieved through local delivery of the Troubled Families Programme has never been more important. This enhanced level of fiscal accountability locally and nationally represents a significant cultural shift, but one which will inform local strategic priorities, investment decisions and operational developments.



The Cost Savings Calculator has been improved significantly to reflect learning from the first programme and the different approaches taken with NIS and FPD. The benefits section of the Cost Savings Calculator is pre-populated for local authorities using information provided for NIS and FPD.

The only part of the Cost Savings Calculator which all local authorities must complete is the costs section, where the money invested in the delivery of the programme and (for comparison) pre-programme investments in targeted interventions for a comparable cohort should be entered.

To reflect the importance placed on this aspect of the evaluation, from December 2017 the national Troubled Families Team will be offering a package of direct advice and support to local authorities, including seminars, webinars, telephone support and one to one help where necessary in order to improve the quality of the data provided.

# Data Sharing Guidance and Principles

**Please note:** new information sharing legislation – the Digital Economy Act and a new Data Protection Act – will come into force in early 2018 at which point the guidance below will be reviewed and, if necessary, updated.

For the latest information and guidance on the new legislation, visit the website of the Information Commissioner’s Office.<sup>48</sup>

The national evaluation of the Troubled Families Programme reported that the programme has helped local authorities improve data monitoring and data sharing with most partners and this was widely described as a critical success factor in identifying families, recording outcomes and providing support for families.<sup>49</sup>

This section highlights the different sources of information that are available to local authorities to help identify families who are eligible for support under the Troubled Families Programme. It includes current potential gateways, including statutory and common law powers, for sharing information.

Families will continue to be identified on a ‘household’ basis. For these purposes, the definition used by the Census 2011 may be useful: *‘a group of people who either share living accommodation, or share one meal a day and who have the address as their only or main residence’*. For the purposes of the programme, families must contain dependent children.<sup>50</sup>

In some areas, population churn and liaison between services across local authority boundaries may present problems. For example, some children may live in one local authority, but attend school in another and some families may move between local authorities mid-intervention. The national Troubled Families Team will not prescribe how local authorities should manage these challenges, but encourage collaboration to agree pragmatic and legally compliant local data sharing solutions between local authorities.

## Parents and children involved in crime or anti-social behaviour

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<sup>48</sup> <https://ico.org.uk/>

<sup>49</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/611991/Supporting\\_disadvantaged\\_families.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/611991/Supporting_disadvantaged_families.pdf)

<sup>50</sup> Non-dependent children in families are those living with their parent(s), and either (a) aged 19 or over or (b), aged 16 to 18 who are not in full-time education or who have a spouse, partner or child living in the household. Such children are often young adults, but may be older.

In most cases, the main sources of information about parents or children involved in crime or anti-social behaviour are likely to be the police, anti-social behaviour teams, youth offending teams, housing providers, prisons and providers of probation services.<sup>51</sup>

A significant proportion of crime and anti-social behaviour data is likely to be drawn from the local police, using the Police National Computer and local youth offending teams.

Section 115(1) of the Crime and Disorder Act 1998 provides a legal gateway for the sharing of personal data to facilitate multi-agency strategies such as the Troubled Families Programme. The police may also rely on their common law power to share data for 'policing purposes', which includes 'preserving order' and 'preventing the commission of offences', both aims of the Troubled Families Programme. For further guidance on data sharing between the police and local authorities, please refer to the Guidance Note published on the Knowledge Hub.<sup>52</sup>

In addition, section 17 of the Crime and Disorder Act 1998 recognises that local authorities have responsibility for the provision of a wide and varied range of services to and within the community. In carrying out these functions, section 17 places a duty on them to do all they can to reasonably prevent crime and disorder in their area.

As part of the Troubled Families Programme, local authorities may also need to obtain data in relation to prisoners and adult offenders with parenting responsibilities, for which the main sources will be the National Probation Service, Community Rehabilitation Companies and prisons. This information can, in some circumstances, be shared under section 14 of the Offender Management Act, which permits the sharing of data that would assist with the supervision or rehabilitation of offenders.

Given that the National Probation Service and Community Rehabilitation Companies are relatively new organisations, local authorities should seek to build relationships with local providers and encourage them to collect and share the data that will help them identify troubled families in a legally compliant manner.

### **Children who have not been attending school regularly**

Most of the relevant education data is already collected by local authorities on a termly basis using Unique Pupil Numbers, as part of standard data collection requirements for the Department for Education as part of the returns to the 'School and Alternative Provision Census'. The national Troubled Families Team recommends the use of this locally collected data to ensure the information is as current as possible.

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<sup>51</sup> National Probation Service, Community Rehabilitation Companies and other providers of probation services.

<sup>52</sup> [https://khub.net/group/supportingtroubledfamilies/forum/-/message\\_boards/message/26812234](https://khub.net/group/supportingtroubledfamilies/forum/-/message_boards/message/26812234)

There are a number of limited exceptions, where the information collected locally for the School Census may need to be supplemented by other sources:

**Academies:** Academies collect this data through compatible systems and are legally able to share this with local authorities using Part 4 section 23 of the School Discipline (Pupil Exclusions and Reviews) (England) Regulations 2012. Around half of academies already share their data with local authorities.

**Fixed exclusions:** This data is not always collected for children in alternative provision, independent schools or non-registered alternative provision providers. As such, local authorities should identify these children within their own local systems and through discussions with such schools. We expect these to be relatively small numbers. Some supplementary information may be needed from Education Welfare Officers (or equivalent) to produce a complete picture of each child's circumstances. For example, this may relate to children who are in reception year classes and sixth form.

There are a small number of children who are considered 'missing' because they are not on the school roll. These children are likely to be among the most vulnerable category of children and therefore, it is important that the Troubled Families Programme identifies them as far as possible. However, it is not our intention to identify children who are being appropriately home schooled, as these children will be receiving an education from their parents.

Local authorities may collect and share attendance under the school census regulations – Education (Information about Individual Pupils) (England) Regulation 2013, S.I. 2013/94 – which require maintained schools and pupil referral units to share information about pupil attendance.

### **Children who need help**

Most of the information needed to apply the suggested indicators under this headline problem is already collected within local authorities, as part of their Children Services arrangements (or equivalent). However, it will typically require local authorities to combine information from across a range of sources.

For example, to identify children who have not taken up the early education entitlement, this may include cross-referencing information relating to two year-old children who are eligible for the early education entitlement with information about those who are actually attending an early years setting. Under section 99 of the Children's Act 2006, local authorities obtain information about individual children who are receiving early years provision; and under section 13A of the Childcare Act 2006, Her Majesty's Revenue and Customs shares tax benefit credit and benefit information with local authorities for the purpose of determining whether or not a particular family may have a child who is eligible for funded early education.

Local authorities are also likely to draw a significant amount of the data relating to children who need help from their own local authority Children's Services, the relevant gateway is the implied powers to share information under section 17 of the Children Act 1989 in order to enable assessments to be undertaken as to whether services may be required by a child in need. More generally, implied data sharing powers under section 10 of the Children Act 2004 may also provide a means of obtaining information in order to safeguard and promote the wellbeing of children.

### **Adults out of work or at risk of financial exclusion or young people at risk of worklessness**

For the first Troubled Families Programme, DWP created a new legal gateway under the regulations of the Welfare Reform Act 2012. This allowed DWP to share data with local authorities – without informed consent – for the sole purpose of identifying eligible families.

The regulations came into effect in May 2012 and they will continue to provide the gateway for identifying young people and adults in receipt of out of work benefits under the current programme. They will also provide the gateway for the sharing of this data once UC comes into effect, providing a gateway for adults claiming UC and subject to work related conditions.

Local authorities can access information on legacy benefits such as JSA and ESA via an automated system the Automated Data Matching Solution (ADMS) for the Troubled Families Programme. Guidance is available on the Knowledge Hub.

For families who move onto Universal Credit (UC), the data sharing arrangements with the Department for Work and Pensions (DWP) are under development and DWP is exploring a mechanism to automate matching of Universal Credit data. In the interim, arrangements should be agreed locally with Troubled Families Employment Advisors to capture the right data.

Where family members are in receipt of Universal Credit (UC) Jobcentre Plus Single Points of Contact will also be able to help local authorities with any queries and provide information they need.

To identify young people who are at risk of or are already not in education, training or employment, local authorities may draw on information held in their client caseload information systems (or equivalent). Local authorities have a statutory duty to encourage and assist young people to participate in education or training. This stems from sections 68 and 70 of the Education and Skills Act 2008. As part of this duty, local authorities collect information on 16 to 19 year-olds and will be aware of those who are not in any form of education, employment or training, including those who are not able to work because of illness or other reasons such as caring for dependants or family members. Local authorities may choose to share this information internally further to their general power of competence under section 1 of

the Localism Act 2011. This information could be defined as individual pupil information under section 537A(9) of the Education Act 1996 so could also be shared by local authorities using section 537A(6) of that Act.

### **Families affected by domestic violence and abuse including violence against women and girls**

In most cases, the main sources of information on families affected by domestic violence and abuse are likely to be the police or local domestic violence support services.

Like crime and anti-social behaviour, data obtained from the police can be shared using section 115 of the Crime and Disorder Act 1998 – see guidance on the Knowledge Hub.<sup>53</sup>

Under section 54 of the Domestic Violence, Crime and Victims Act 2004 information can be disclosed by police to victim support groups (with consent). The data can also be shared between agencies via Information Sharing Agreements (ISAs). It is advised that ISAs between local services and local authorities should conform to IDVA Protocol, MARAC Protocol, MARAC/MAPP Protocol and SDAC Procedures.

Given the sensitive circumstances and nature of these cases, it is most likely that agencies will refer cases to a local authority on an individual basis (see referral section below).

### **Parents and children with a range of health problems**

The sharing of health data for the identification of troubled families is one of the biggest challenges for the Troubled Families Programme. Given the particular sensitivities around the sharing of personal health data, the national Troubled Families Team worked with Public Health England, Department of Health and NHS England to agree an approach that allows families to be identified for support under the expanded programme on the basis of their health needs.

The agreed interim guidance<sup>54</sup> recommends that a list of families that have already been identified as meeting one of the programme's indicators is shared with relevant health partners so that they can use this to flag whether any of the suggested health indicators are met. Local authorities will need to talk to relevant health partners and / or governing bodies to work out the best ways of gathering and sharing this data locally. Some local authorities may already be receiving health data or have negotiated alternative data sharing arrangements with local health partners.

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<sup>53</sup> [https://khub.net/group/supportingtroubledfamilies/forum/-/message\\_boards/message/26812234](https://khub.net/group/supportingtroubledfamilies/forum/-/message_boards/message/26812234)

<sup>54</sup> <https://www.gov.uk/government/publications/troubled-families-supporting-health-needs>

## Data Protection Act 1998

As most of the data to be processed for the purpose of identifying families will be 'personal data'<sup>55</sup> within the definition of the Data Protection Act, and in many cases this data may be considered 'sensitive personal data'<sup>56</sup> within the definition of the Data Protection Act, it will be important for local authorities to ensure that the processing of personal data is carried out in accordance with the data protection principles set out in Schedule 1 to that Act.

The first of these principles requires that personal data must be processed fairly and lawfully and, in particular, that a condition of Schedule 2 is met. Where the data to be processed is sensitive personal data, a condition of Schedule 3 must also be met. One of the conditions an authority may rely on to process personal data under these Schedules is the individual's consent (or in the case of sensitive personal data, explicit consent) to that processing. However, where it is not possible for an authority to seek consent in advance of processing personal data there are other conditions for processing which an authority may seek to rely on. For instance, when seeking to satisfy a Schedule 2 condition, authorities may look to paragraph 5(d) of the Schedule which allows for processing where it is necessary for the exercise of a function of a public nature exercised in the public interest by any person.

The conditions to allow for the processing of sensitive personal data under Schedule 3 are more limited and careful consideration will need to be given to the applicability of any particular condition. For instance, where it is not possible to seek explicit consent to processing, it may be possible for authorities to rely upon the condition set out in para 7(1)(b) of Schedule 3. This allows for processing where it is necessary for the exercise of any functions conferred on any person by or under an enactment. Local authorities will need to consider whether the information is needed in order that the authority can carry out a function which the authority has a duty or power to carry out under legislation.

It may also be possible for local authorities to rely on Article 4 of the Data Protection (Processing of Sensitive Personal Data) Order 2000, which provides for processing which (a) is in the substantial public interest; (b) is necessary for the discharge of any function which is designed for the provision of confidential counselling, advice, support or any other service; and (c) is carried out without the explicit consent of the

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<sup>55</sup> means data which relate to a living individual who can be identified – (a) from those data, or (b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

<sup>56</sup> personal data consisting of information as to - (a) the racial or ethnic origin of the data subject, (b) his political opinions, (c) his religious beliefs or other beliefs of a similar nature, (d) whether he is a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992), (e) his physical or mental health or condition, (f) his sexual life, (g) the commission or alleged commission by him of any offence, or (h) any proceedings for any offence committed or alleged to have been committed by him, the disposal of such proceedings or the sentence of any court in such proceedings.

data subject because the processing is necessary in a case where consent cannot be given by the data subject; the data controller cannot reasonably be expected to obtain the explicit consent of the data subject; or it must be carried out without the explicit consent so as not to prejudice the provision of that counselling, advice, support or other service.

## **Referrals**

This Financial Framework suggests a range of indicators that can be used to identify families under the six headline problems. However, we recognise that referrals will be one important way through which local authorities can identify the families with the breadth of problems that mean they would benefit from this programme. This is why there are suggested indicators under each of the headline problems referring to 'problems of equivalent concern'.

These indicators enable referrals from professionals locally and, depending on the nature of the risk and seriousness of the circumstances, may be undertaken with or without the individual's consent. In some cases, consent must be obtained by law before a referral is made. In cases where consent is not prescribed by law, individuals should be made aware that their data is being shared and their consent should be sought wherever possible. However, this will be a matter for local assessment and professional judgment in the circumstances of each case.

Given the scale of the programme, referral arrangements are unlikely to be sufficient to identify the required volumes of families in each local authority. However, the programme provides the flexibility to identify families through these means, where appropriate and as a supplement to other sources of identification.



# Spot Checks

Since 2015, regular spot checks have been undertaken by the national Troubled Families Team. Members of the team conduct an in-depth visit to a local authority in order to ascertain the eligibility of selected claims when reviewed against the Financial Framework as well as that authority's individual Troubled Families Outcomes Plan (TFOP).

These spot checks are a compulsory part of the audit of the programme to ensure that public funds are being used appropriately within the terms of the Financial Framework. The method used by the national Troubled Families Team has been approved by the Government Internal Audit Agency, and the national team intend to visit every local authority twice for this purpose before the end of the programme in 2020.

It is vital that local authorities take sufficient time to prepare in advance of the spot check. Supporting material is available through the Knowledge Hub including the template the spot check team will use.

During a spot check all evidence relating to a selected number of claims will be reviewed to ensure:

- the family were eligible for the programme;
- that the principles for working with families under the programme have been adhered to; and
- that a valid claim for significant and sustained progress or continuous employment has been made.

The evidence provided to support claims can include both qualitative and quantitative data, and should comply with the local authority's current TFOP, which must be provided in advance of the spot check.

Depending upon the outcome of the spot check, additional visits or data may be required and follow up support from the national team may be provided. Money paid for invalid claims will need to be repaid by the local authority. Chief Executives will be informed of the outcome of all spot checks.

For those local authorities who are successful in their bids for Earned Autonomy, a separate auditing process will be developed to reflect this, with information provided in due course.

# Principles for Internal Audit

## The Role of Local Authority Internal Auditors

As laid out in this document, local authorities' Internal Auditors should continue to verify results claims before they are made. However, DCLG has reflected on learning from the first programme and worked with local authorities to consider how this function should operate in the context of the current programme's different approach. In response, a group of local authority Internal Auditors have worked with the national Troubled Families Team to lay out four guiding principles. These principles are intended to inform audit practice and ensure that the right balance between rigour and proportionality is struck in the wider interests of the programme's delivery and value for money objectives.

## The Principles

- 1. Collaboration:** Internal Auditors and local authority Troubled Families Coordinators should jointly agree the evidential expectations required to claim a result within their Troubled Families Outcomes Plan. This should be a collaborative relationship, based on early and ongoing joint work.
- 2. Proportionality:** While the rigour of the process is important and appropriate practices should be in place to ensure claims are valid, the burden and costs associated with these practices should be proportionate to the size and financial value of the claim. For example, it may represent a disproportionate burden and expense for Internal Auditors to validate every result before a claim is made. As a minimum, and following standard local practice, the following should be undertaken:
  - a representative sample of 10% of results should be verified by the Internal Auditor before each claim is made, but larger sample sizes may be required for small numbers of claims in order to ensure the audit is meaningful;
  - the audit should verify the families' eligibility for the programme, with supporting evidence and with reference to the Financial Framework; and
  - the audit should verify whether the progress measures have been achieved, with supporting evidence and with reference to the local authority's Troubled Families Outcomes Plan.
- 3. Best Evidence Available:** While 'hard' data from local administrative systems will be available for many outcome measures, it may not be accessible in every case and this should not limit the programme's ambition to achieve improved outcomes for families. Furthermore, such administrative data may not always tell the full story where formal reporting levels are variable (e.g. domestic violence reporting to the

police). In such cases, qualitative evidence provided by practitioners and families may be suitable alternatives. For all data, the Troubled Families Coordinator should ensure appropriate quality assurance processes are in place and the Internal Auditor may review these arrangements as part of their verification process.

4. **Communication:** Troubled Families Coordinators and Internal Auditors should share with each other as much information as far in advance as possible. This should include any relevant guidance documents provided to Troubled Families Coordinators by the national Troubled Families Team, any results claim timetables and any new Internal Audit expectations.

# Annex A- Families with No Recourse to Public Funds

Local authorities delivering the Troubled Families Programme provide a range of support and services to eligible families. Participating local authorities have committed to prioritising those families with multiple problems who are of most concern and highest reactive cost for inclusion in their local programmes.

For this reason, a family with no recourse to public funds (NRPF) would not – subject to the guidance below – necessarily be prevented from receiving support through the programme. This includes employment support for NRPF families with leave to remain in the UK and permission to work here. But the employment and other support offered by the programme is unlikely to be appropriate where the family with NRPF is here unlawfully and should be leaving the UK.

Any employment support provided by Troubled Families Employment Advisors (TFEAs), will be in line with the principles followed by Jobcentre Plus Work Coaches. That is, to advise those with NRPF, with permission to work in the UK, what employment networks, help and further support is available in their area. Employment support is distinct from any benefit payments in respect of welfare and housing.

Local authorities are reminded that any support provided to NRPF families through the Troubled Families Programme:

1. Must not be in breach of any immigration conditions imposed on them (e.g. in respect of work).
2. Must be in accordance with Schedule 3 to the Nationality, Immigration and Asylum Act 2002, which restricts access to local authority support for families without immigration status.

Under Schedule 3 to the Nationality, Immigration and Asylum Act 2002, the following categories are prevented from receiving local authority support or assistance:

- A person with refugee status granted by an European Economic Area (EEA) country and any dependants;
- EEA nationals and any dependants;
- Refused asylum seekers who have failed to comply with removal directions and any dependants;
- A person unlawfully present in the UK (including visa overstayers, illegal entrants and refused asylum seekers who claimed asylum in country, rather

- than at port of entry); and
- A refused asylum seeking family the Home Office has issued with certification confirming that they have failed to take steps to leave the UK voluntarily.

Local authorities are not prevented from providing support and assistance to the categories listed above where this is necessary to avoid a breach of human rights. However, given the intensive and complex forms of support offered by the Troubled Families Programme, we do not anticipate that the programme's resources will be required for this purpose.

Local authorities with access to the NRPF Connect database, a secure web-based database, can use this system to contact the Home Office. To gain access to this system, local authorities can contact the NRPF network on the following email address: [nrpf@islington.gov.uk](mailto:nrpf@islington.gov.uk). Local authorities without access to this system can contact the Home Office directly via the Status, Verification, Enquires and Checking email address: [ICESSVECWorkflow@homeoffice.gsi.gov.uk](mailto:ICESSVECWorkflow@homeoffice.gsi.gov.uk). Both methods can be used to seek advice and information in respect of a person's immigration status and local authorities are encouraged to do so if there is any uncertainty.

Immigration Enforcement can provide access to a chargeable enhanced service to support local authority decision making. The Checking and Advice service offers on-site assistance, training sessions and access to a real-time immigration status check telephone line. To find out more, please contact the team on the following email address: [IEChecking&AdviceService@homeoffice.gsi.gov.uk](mailto:IEChecking&AdviceService@homeoffice.gsi.gov.uk).

The Home Office is able to provide assistance to families who wish to return to their home country through the Voluntary Returns Service. Families are eligible to receive up to £2000 per person in reintegration funds. Funds are given in cash or a combination of cash and reintegration support in kind on return, depending on the destination country. The Service can provide bespoke packages to meet complex family needs as well as assisting with obtaining travel documents. Local authorities and families can contact the Voluntary Returns Service on 0300 004 0202.