

# CMA response: Hertfordshire County Council

Theme 1 – Nature of Supply
T1:Q1 - How has the provision of children's homes, unregulated accommodation and foster care for looked after children developed over time, what has driven this development and how will the wider environment shape it in the future?
<p>T1:A1</p> <p>Most children's homes are built to supply the mass market. They do not always take on more difficult cases so they can meet the needs of all looked after children.</p> <p>Some are profit driven.</p> <p>The demand for smaller and solo provision has increased over time so very few providers are now able to offer more than 4-5 bed spaces.</p> <p>The market has not caught up with the changing need and this is a challenge nationally.</p> <p>There has also been an increase in providers serving notice at the last minute so demand for emergency provision has increased.</p> <p>Providers don't necessarily respond to the needs being presented in terms of accepting referrals; Ofsted is a factor at times since providers may be reluctant to take on certain children who present with higher needs and risks, due to fear of Ofsted deeming the provision to be inadequate.</p> <p>There is a shortage of skilled staff in the marketplace to manage more complex and challenging behaviours. Staff are not paid commensurate with the needs of children. To do this, staff need to be paid wages that reflect the level of knowledge and skill required to look after some of our most vulnerable children. There is also a shortage of Registered Managers who are able to deliver strong and effective services.</p> <p>Due to the increased complexity of children entering care, there is a significant need for providers to specialise and offer more bespoke provision. There is a noted increase in children with significant mental health issues and an increase in children presenting with significant exploitation issues (gangs, violence etc). Mental health colleagues need to engage more effectively with the LAC agenda in order to prevent Tier 4 admission and also to better facilitate 'step down'.</p> <p>In foster care, there has been an increased need for teenage placements and sibling placements and there is a current shortage.</p> <p>We have developed a fostering strategy to increase the number of carers overall whilst increasing the support offer and trying to attract carers for specific groups of children.</p> <p>Fostering has experienced the same challenges in terms of increased complexity of need and presenting risk.</p> <p>16 plus accommodation (unregulated): increased demand over time. There are more providers willing to set up local provision and we have not faced the same challenges in sufficiency for this group. The demand has grown in this area and we are not clear currently how pending Govt guidance in this area will affect the market, particularly with regard to those supporting some of the most complex, older teenagers who either will not be accepted by children's homes or have been issued notice from children's homes, often more than once.</p>
T1:Q2 - Are there significant differences in how providers operate, depending for example on the type of provider they are, their size or the geographic region in which they are operating?
<p>T1:A2</p> <p>Demography and geography are significant issues for Hertfordshire.</p> <p>Complex needs are driving the market and prices.</p> <p>There is a small group of large providers dominating the market making it difficult for new or smaller providers to get a foothold.</p> <p>The cost of buildings is an issue and being able to build upon a business.</p>

Providers have told us it is more of a challenge to recruit foster carers in our area as we experience higher levels of employment and house prices are not competitive. Many households cannot afford one spare room to foster children, let alone several spare rooms to foster a sibling group. This applies across other placement types with challenges with property prices.

T1:Q3 - To what extent is a lack of availability of suitable residential and fostering placements driving undesirable outcomes for local authorities and children?

T1:A3

Lack of suitable accommodation can lead to increased placement moves and an increase in out of area placements.

It is rare to get placement choice for a child unless they are very young.

When children are placed out of area, this leads to increased challenges in accessing appropriate health and education provision as well as difficulties maintaining relationships with family and friends and with their allocated social worker. It is also more difficult when it comes to leaving care since they will have to choose which set of connections they want to maintain.

The lack of placement choice means we are unable to offer children choice and has implications for children moving away from their family and community

T1:Q4 - How have the following four types of children's care home and fostering agency provision developed over the last decade:

- a. Local authority
- b. Private – private-equity owned
- c. Private – non-private-equity owned
- d. Third sector private.

T1:A4

- a. Recent activity locally has more than doubled bed availability for children's homes. As part of the Residential Strategy project, we have the opportunity to increase in-county children's home beds by 31. It is clear by the number of referrals we have and when we have no choice but to place children at a distance that there is a clear need to increase capacity close to home. Knowing that there is this need, there is also then an opportunity created to invest in developing high quality local placements which means that we not only get good value for money we can offer children placements in the communities they know. Allowing for better links and contact with families, education and health. Fostering recruitment is a constant activity and feedback from the private sector is that as a local authority we perform extremely well. In spite of this we are not able to recruit sufficient numbers to meet need. We have developed a Fostering Strategy to encourage the retention of current foster carers, the recruitment of further foster carers and the embedding of best practice in collaboration and information sharing.
- b. Private providers are starting to develop more specialist provision but haven't caught up with the current demand and needs. Fostering services have recognised the need to build additional support into placements to adapt to current need and we have undertaken financial reviews so that payments to carers reflect the level of care and support required to meet current need.
- c. they behave similarly – engage with local authority but face same geographical restraints on property prices and talent pool of foster carers as the local authority does
- d. As above

T1:Q5 - Does the status of the provider (ie Local authority, private equity, non-private equity or third sector) significantly impact on the nature of the homes and fostering arrangements they put in place, in terms of: the number of placements (eg do they have incentives to invest in new capacity), price, value for money, location and quality of placements?

T1:A5

Yes – private equity providers have the funds to buy properties and this doubles as an investment.

This is less significant for Fostering – more based on infrastructure

The Local Authority as provider of residential and foster care has a strong incentive to invest in new capacity, both to ensure good outcomes for their children and young people whilst maintaining community links, but also as a means of controlling quality and cost. In addition, the Local Authority is well placed to develop services specific to the needs of their young people. Hertfordshire, for example, has invested significantly in both residential and foster provision to increase the number of placements and enhance quality. It is also recognised that we will not be able to achieve sufficiency as a local authority and that we will continue to be dependent on a mixed economy of care. This makes partnership working arrangements very significant and these can often be better with smaller providers.

T1:Q6 - With regards to private equity ownership of children's care homes and fostering agencies:

- a. What features of children's care homes and fostering agencies attract PE investors? Are these the same compared to non-PE investors?
- b. To what extent are property prices a driver of PE incentives to invest?
- c. Do PE investors in the sector have a shorter-term investment horizon than other types of providers, and if so, what effect does this have on the service they provide and investment in future capacity?
- d. Do PE-owned children's homes or fostering agencies carry a higher financial risk profile or leverage than the other types of providers, and if so what effect does this have on the service they provide and investment in future capacity?
- e. What are the implications for the number of placements, price, value for money, location and quality of placements if group companies providing essential services such as children's social care are registered offshore?

T1:A6

- a. Property and profits attract PE investors
- b. Property prices are a big driver, coupled with geography
- c. The experience of whether a PE investor require a more rapid return on investment varies. In any case, the investor will know that if it doesn't work, they still have money from the property to re-invest elsewhere. It is possible that they will be less driven by the desire to help vulnerable children than in ensuring the best investment portfolio due to the distance in the supply chain between the investor and the end provision of the service to children and young people. PE investors may also be better placed to carry short term losses allowing them to weather the initial start-up phase.
- d. PE owned homes/foster agencies definitely carry more leverage as they have more financial reserves. Due to economies of scale, they also have access to other services (such as a therapist or education provision) and have quicker mobilisation periods. The quality of services provided may well be similar regardless due to standards and inspection regimes.
- e. In theory, costs may be lower due to the tax efficiencies of being registered off-shore. In practice, such savings are not passed on to the Local Authorities but remain as part of the profit margins. There might be risks that larger, off-shore based organisations being more cumbersome in their communications whereas independent homes can/maybe able to communicate quicker. In the end, it is more the staff in the home/carers that matter.

## Theme 2 – Commissioning

T2:Q1 - How has the way in which local authorities commission places in children's homes, unregulated accommodation and foster care developed over time, what factors have driven this, and how is it likely to develop in the future?

T2:A1

Children's Homes: Hertfordshire undertook to a procurement exercise to establish a framework for residential care providers, but this was not successful due to a lack of engagement by private providers.

Fostering: Hertfordshire has also tried creating a Framework for Fostering Agencies however the Fostering Agencies were unable to grow due to capacity issues. We have tried offering block fostering opportunities and these have not been taken up. We currently commission via spot purchase for Fostering and this is all that seems to work with the market. Hertfordshire has developed a Fostering Strategy which aims to innovate practice:

- Growing the Mockingbird Family Model by setting up additional hubs to extend the community of support for foster carers
  - Developing a new approach to peer support
  - Trialling Reflective Fostering model
  - Trialling new IT systems to enable better working together, streamlining of processes and efficient information sharing
- We will explore new ways of ensuring we are meeting the needs of children with the most complex needs.

We are developing a Residential Strategy and creating more of our own internal capacity through an additional 31 beds both run in-house and commissioned through providers and facilitating this by refurbishing Hertfordshire owned properties for use as children's homes. We are aware that in the majority of cases children will do better closer to home and that they can be supported more readily than those children placed at a distance. The Residential Strategy Project, that commenced in 2019, gives an exciting opportunity to support more children to live locally in the communities they know and in addition be able to support, and have better oversight, over all their needs, whilst ensuring these are met successfully within our own County. We feel it allows us, as a Local Authority, to support our children and their families to receive high quality care and in addition be able to respond much more effectively, when there is a crisis, to support stability by ensuring the right professionals can be involved quickly, to support both the child and the placement avoiding potential breakdown. We are working hard in collaboration with Education and Health partners to provide a holistic package for both our in house and independently run homes to offer support via adequate assessment, learning and development opportunities for staff teams, specialist therapeutic support and consultation, where needed, all by professionals who know our young people. We want those supporting and caring for our children to be the best they can be. Working with Education colleagues who have developed bespoke education packages and actively working with local schools and ESCs in supporting children to re access education and support them to overcome past negative experiences to want to re-engage. Working with Health to create a Specialist therapeutic support team that will not only support children in need but also the staff team to give confidence and expertise through training, collaborative direct work and consultation to support placement success. In order to ensure the best possible placements, we need to ensure we are supporting them with all we can offer- having good education provision and therapeutic support for our most traumatised children is key to this success.

16+ Accommodation Framework: Prior to 2015 Hertfordshire sourced semi-independent accommodation through a large number of spot providers with inconsistent and sometimes excessive prices for their services. Many didn't have a good standard of accommodation, and the level of support received was variable. Hertfordshire commissioned the 16+ Accommodation & Support Framework on 02/11/2015 for 4 years. This specified the quality of service we required for a value for money price. The Framework operates strict monitoring processes to ensure these

standards are consistently met by providers. The 2nd Framework commenced 2019 and expanded the types of provision possible on the Framework, while continuing to ensure value for money for our semi-independent placements.

**Additional Comments:**

Hertfordshire is leading on a National Project, supported by the Local Government Association and other Local Authorities Nationally to create a 16+ spot contract template. The DfE have been consulted throughout the project and agree with the approach and contract documentation. The documentation will include National Standards. The standards aim to create uniformity across the 16+ sector and a tool for Local Authorities holding providers to account. The final template will be based on the good practice developed in Hertfordshire and other participant Authorities in the National Contract Steering Group (NCSG) with the lack of current regulation, a comprehensive review of the 'Other Arrangements' document has taken place, including tools which support Local Authorities to quality assure and continuously monitor 16+ provision.

Another strand of the NCSG is to review the current national templates for Fostering and Residential provision. All involved in this area of work (LGA, Independent Children's Homes Association, Nationwide Association of Fostering Providers, Young Commissioners, Care Experienced representatives and other Local Authority representatives) agree that uniformity in the tools to commission is required. This will create efficiencies for both purchaser and supplier (legal support, administration, staff time)

We work with three other Local Authorities on the Cross Regional Partnership which commissions a block of 26 beds over the four counties from a single provider.

We work with providers on our residential strategy to ensure best practice is embedded.

We have experienced a greater appetite for private providers to engage if we offer block contracts, particularly where these can be of sufficient duration to encourage investment and the development of new services.

**T2:Q2 - How able are local authorities to secure appropriate placements to meet the varying needs of children in their care, for a reasonable cost?**

**T2:A2**

We often have difficulty securing appropriate placements at a reasonable cost.

We often use the **only** placement offered rather than being able to choose the most appropriate. Close partnership working improves the ability to negotiate cost, for example where we have placed block contracts. We have also worked on a 16+ Framework for Semi-Independent placements, which had a cost saving of around £400k since it started in November 2019. This was over 97 placements for that period.

Challenges: children stepping out of custody or at risk of custody and children with mental ill health where provider unit costs can be extremely high (up to between 13k to 17k for one placement)

There is an awareness across the market of the shortage of placements which means private companies are able to exploit LAs if they wish to do so.

T2:Q3 - To what extent do features of the market limit the ability of local authorities to secure appropriate placements at reasonable cost, including:

- a. levels and uncertainty of future demand;
- b. nature of demand, e.g. age profile of looked-after children or prevalence of complex needs;
- c. levels of uncertainty of future funding;
- d. level of access to information on providers and individual placement options;
- e. any other factors?

T2:A3

- a. Demand is certain, levels and complexity continue to increase. Supply has not risen, yet demand has, especially in terms of Residential care
- b. Typically, placements for 13-15-year olds continue to pose with the biggest challenge. As referred to above, an increase in children involved in criminal exploitation, presentations of challenging behaviour and autism and mental ill health in the teenage population has created a different set of demands. More investment is needed in universal services and mental health needs prior to children becoming accommodated. Providers are anxious about high needs and risks and, due to demand outweighing supply, providers are likely to choose referrals of the children with the lower level needs. Increasing need for joint approaches to complex children has also meant provision that is geared to support significant mental health needs, including onsite specialist support, is very scarce.
- c. Investment is needed at all levels to create the right provision for children entering care. Several years ago, Hertfordshire was significantly overspent as a result of an increased number of children needing residential care. This led to the overarching 'invest to transform' programme. We are not unique in having an overspent placement budget, yet authorities differ in their response due to insufficient funding.
- d. Hertfordshire is the lead authority for the Children's Cross Regional Arrangements Group which has 34 LA members who work collaboratively to develop and share best practice in children's commissioning. As part of this, we maintain a database of all registered providers, but there is no incentive or mandate for providers to keep their vacancy information up to date and share this appropriately. There is no obligation to take difficult placements or help provide solutions.
- e. Lack of available Welfare Secure Beds for children in need of that type of accommodation. To try to address this shortfall, Hertfordshire is working in partnership with regional colleagues to develop a feasibility study for a regional secure welfare provision.

T2:Q4 - To what extent does the capacity, capability and practice of local authorities limit their ability to secure appropriate placements at reasonable cost, including:

- a. the relative use of frameworks, block contracts or cost and volume contracts, as against spot purchasing;
- b. the extent to which local authorities proactively forecast demand and seek to attract providers into their area;
- c. levels of collaboration between local authorities in planning and purchasing;
- d. ability to recruit and retain appropriate staff to carry out their planning and procurement functions;
- e. any other factors?

T2:A4.

- a. Hertfordshire's geography does not lend itself to Frameworks, particularly fostering frameworks, but also residential due to property prices. We have tried introducing Frameworks and block contracts where the expectation is providers source their own properties for residential services, but providers have been less willing to engage. There has been more success with block contracting residential services where Hertfordshire has offered to provide the property, the provider is commissioned for the service delivery element only. Hertfordshire will expand this as the residential strategy is fully

implemented over the next two years. We have a 16+ Framework for Semi-Independent placements with a range of partners which does work well. We have seen an increase in the quality of the accommodation and support provided, as well as the availability of beds to be bought in to use as and when is needed. This has not, however, helped us to respond to the increasing need for extremely vulnerable and high risk young people, who require a more specialist care placement. We do not have cost/volume contracts due to unpredictability of individual children's needs.

- b. As a Local Authority, we seek to attract providers all of the time. We have regular provider meetings and events. We offer sharing opportunities with Learning and Development. Forecast and demand is tricky, although we do know those on the edge of care. We can undertake short term forecasting and undertake regular needs analysis work. We have worked hard in forging relationships with local providers creating forums which bring managers together to offer support and share practice. As part of the Residential Strategy Project we have completed needs analysis to inform placement type and need and, knowing that property price is high in the area, we are offering providers opportunities to set up, via the procurement and tendering process, services within existing council owned properties. This is an attempt to encourage more providers to establish themselves in the area where they may previously have not considered this to be viable due to cost of property.
- c. We have been innovative with the use of the Cross Regional Partnership and sharing monitoring visits. This increases the Local Authority's relative "buying power" by working collaboratively. We work with 3 other Local Authorities to provide 26 beds jointly through a regional contract and are very active in the Eastern Region of Local Authorities sharing best practice and exploring a joint bid for secure beds.
- d. We have no issues recruiting staff for our planning and procurement functions
- e. Current procurement regulations are often a barrier to LAs being able to commission independent social care services quickly enough which often leads to challenges of responsiveness to meet the immediate needs of individual children and young people.

**T2:Q5 - Are there examples of good practice within or among local authorities that have been effective in overcoming any of these potential difficulties?**

**T2:A5**

We benefit from being the host of CCRAAG – Children's Cross Regional Arrangements Group. This enables us to share knowledge and best practice with other LA partners and providers. The partnership shares monitoring and fee negotiating processes.

Hertfordshire has a residential strategy that aims to create an additional 31 beds run both by our own in-house residential services and by independent providers in Hertfordshire by March 2023, primarily by refurbishing properties within the HCC portfolio. It is hoped that by providing properties this might overcome a barrier for some of the smaller providers. The new homes will not only increase the number of placements in Hertfordshire, but will be innovative and include specialist therapeutic provision, solo accommodation and emergency provision. The strategy includes partnership work with education and with health colleagues to make sure that children get the right support when they are in residential care and the programme of learning and development for residential staff has been updated to make sure they have the right skills to meet the increasingly complex needs of children.-

We are part of the cross regional partnership with 3 other LAs to jointly commission 26 beds; this shared contract allows the Local Authorities to offer a more attractive contract size and duration to providers thereby encouraging the market and ensuring competitive pricing. -

The Fostering Strategy brings together all the teams supporting those involved in foster care to work as one team to:

- Retain existing carers
- Recruit new carers
- Improve quality of practice
- Develop innovative ways of working

### Theme 3 – Regulatory System

T3:Q1 - Please briefly describe the regulatory system and your assessment of its effectiveness in supporting good outcomes in children's social care. In particular, we welcome comments on:

- a. The interplay between regulators and government, local authorities and providers.
- b. The range of the regulators' functions and whether they ought to be reduced or expanded in any way?
- c. The operational effectiveness of regulators and whether this could be strengthened by reform of their remit and objectives, resources and skills-sets and/or powers.

T3:A1

- a. Providers are concerned about the views of Ofsted, so are more likely to not take higher needs placements. Ofsted need to be able to flex and understand when providers put themselves out to take the highest need placements. Providers are very aware that issues such as frequent missing episodes or self-harm episodes will have an effect on their rating and how Ofsted see them, rather than their performance comparative to the complexity of the placements they have. We appreciate that the regulator challenges this view however this is what we have been told by providers.  
LAs need to have understanding and relationships with providers that accommodates the dynamics of difficult and challenging children in placement. Having local providers allows those relationships to bloom  
Hertfordshire welcomes the Government's proposal to introduce a set of Standards for all 16 plus Unregulated provision. We already have a robust quality assurance system in place which is used by a number of other Local Authorities. Providers on our framework have to achieve the KPIs set out in their contracts which cover safeguarding, independence skills and emotional and physical health. We are, however, alert to the potential impact on the market, particularly in regard to those children where the issue of care or support might be debated. Regulation might lead to both price increases, in some cases, significant, and providers leaving the market.
- b. Need agility and responsiveness of inspectors when emergency situations arise.

T3:Q2 - Are there particular problems in the way placements are supplied and commissioned that the current regulatory system is not well-equipped to address?

T3:A2

It takes too long to register a new children's home provision. To speed this up, there would need to be additional resource allocated or smarter requirements that can be fulfilled in shorter timescales. It would be helpful if providers that already have a proven record in providing placements could demonstrate that they are able to be trusted in their knowledge and understanding of the requirements.

T3:Q3 - Does any aspect of regulation create any perverse incentives on local authorities, providers or other actors, which are driving sub-optimal outcomes?

T3:A3

It is a supplier's market – it is easier for providers not to accept challenging placements. LAs cannot control the supply of children requiring placement.



We have always been transparent with Ofsted where we have had challenges sourcing regulated provision but some LAs may not advise Ofsted of what they do due to fearing regulatory powers therefore they are not able to get advice to help and support and to look for solutions. Whilst we recognise the statutory duties of the regulator, these do not always sit comfortable with authorities and independent providers struggling to find appropriate placements for some of our most challenged and vulnerable young people.

T3:Q4 - Where local authorities use unregulated placements, how do they ensure that these are appropriate in the absence of regulatory oversight? In England, how might this change as a result of the government's recent announcements?

T3:A4

We undertake a rigorous standardised Quality Assurance process using a standard model similar to regulated placements.

Our robust quality assurance process and documentation used for our Framework Providers is shared with our CCRAAG partners to have a unified approach nationally. All Partners also use the "Other Arrangements and Suitable Accommodation Framework" - a system of checks is required to ensure the placement or accommodation (and related services) can be deemed 'Suitable Accommodation'.

All Framework Providers have a full head office compliance visit at the start of the contract, and all provisions receive a H&S property check either prior to initial placement or within 48 hours once the Commissioning & Monitoring Officer has been notified of the placement. They must adhere to the Terms & Conditions, General & Lot Specifications and Key Performance Indicators including improvements in independent living skills, emotional wellbeing and ensuring young people are effectively safeguarded. We believe we have created a very robust monitoring framework to ensure the highest standards of support and accommodation are delivered. Providers risk assess all referrals and can decline referrals if they believe the young people require care rather than support. The standards of support provided are monitored across the framework by the HCC 16+ Accommodation Team to ensure consistency across the framework. Good quality accommodation and appropriately experienced staff are essential.

The Government's announcement is likely to have marginal impact on the approach taken by Hertfordshire as it is already standards based and holds providers to stringent requirements; it may be that the current standards process needs only minor amendment to align to whatever is indicated in the nationally produced standards. As stated above, however, we are concerned about the potential impact on the market in terms of cost and placement availability.

#### Theme 4 – Pressures on Investment

T4:Q1 - What are the main drivers of, and barriers to, decisions to invest in new children's homes capacity by local authorities, private sector and third sector providers? Please consider:

- a. Levels, nature and certainty of future funding;
- b. Levels, nature and certainty of future demand;
- c. Expectations of the level of prices in the future;
- d. Regulatory and policy frameworks;
- e. Barriers to the acquisition of appropriate property;
- f. Barriers to the recruitment and retention of appropriate staff;
- g. Any other factors you think are significant drivers or barriers.

T4:A1

- a. Cost of property is a barrier to entry in the South East. It does vary by location/geography. This applies to LA, private and third sector.  
Size of the LA can also be a barrier – supply and demand issues.  
LAs cannot always guarantee funding due to the short-term nature of funding cycles so difficult to make long term investments / contracts  
LAs do not control the flow of demand and needs are likely to change – for example Mental Health needs are rising dramatically
- b. Based on uncertainty of demand/ matching/complex needs of children small authorities are often not able to run their own homes so that they are cost effective
- c. Purchaser and supplier expectations are very different. Funding needs to match pricing, with higher complexity, prices increase often. Our experience is prices are increasing but not necessarily in line with improved outcomes.
- d. See theme 3 response
- e. See theme 3 response
- f. Recruitment of staff and Registered Managers with the right level of skills and experience can be challenging. The whole market needs greater public/political value similar to some European countries where investment in residential care is high and staff qualification expectations match this.
- g. Hertfordshire have continued to invest in residential care. Some authorities have moved away from this as it is a complex area of business that can very quickly deteriorate and become difficult to manage in certain situations running a reputational risk.

T4:Q2 - What are the main drivers of, and barriers to, decisions by local authorities to expand their use of in-house foster carers, and to new independent fostering agencies entering the market or expanding their operation? Please consider:

- a. Levels, nature and certainty of future funding;
- b. Levels nature and certainty of future demand;
- c. Expectations of the level of prices in the future;
- d. Regulatory and policy frameworks;
- e. Barriers to attracting and retaining appropriate foster carers;
- f. Any other factors you think are significant drivers or barriers.

T4:A2

We have particular difficulty in Hertfordshire due to its location in the South East and its proximity to London as well and other financial/employment alternatives.

LAs may be funded differently for recruitment purposes.

Property size is an issue in this area with fewer households having a spare room.

Barriers include the cost of housing and size of housing.

The Mockingbird model is very good for providing support to foster carers.

Hertfordshire's Fostering Strategy aims to drive recruitment and retention of in-house foster carers by enhancing the offer to foster carers and harnessing the benefits of teams working together.

T4:Q3 - Within the private sector, does the ownership model, particularly whether or not a firm is private equity-owned, affect the appetite of a provider to invest in providing new placements?

T4:A3

Yes, investors will want to expand their investment and become more dominant in the market. A smaller provider will not have the investment power to expand at the same rate and will have less resilience to weather small periods of adverse business activity for them.

T4:Q4 - Are there actions that government, regulators, local authorities (acting independently or collaboratively) or other actors could take to support more investment in capacity where it is required?

T4:A4

The government could identify areas such as Secure Welfare provision to support.

Loans could be given for properties for children's home use or a grant funding programme.

National Procurement Regulations: have elements reviewed to prevent red tape for social care placements to help generate the market.

Consider an amended version of procurement regulations for the social care sector to allow a more agile and collaborative procurement.

Create a government Framework/DPS for all providers for LAs to be able to call off as needed.

Recognition of the complexities involved at all levels to increase understanding of the daily challenges faced.

A clearly defined and agreed understanding of what therapeutic intervention/input is including appropriate models, training/qualifications and standards that apply.

Better joint working between the DfE and DH in regard to children with mental health needs or who fall within the definition of Transforming Care.

National promotion and recruitment initiatives for children's homes staff, increasing public value.