

Competition and Markets Authority Children's social care market study

April 2021

Local Government Association submission

The Local Government Association (LGA) is the national voice of local government. We are a politically led, cross-party membership organisation, representing councils from England and Wales.

Our role is to support, promote and improve local government, and raise national awareness of the work of councils. Our ultimate ambition is to support councils to deliver local solutions to national problems.

We are pleased to respond to this [invitation to comment](#). This submission relates to councils in England; our colleagues in the Welsh LGA intend to submit separate evidence in relation to Wales.

1. Theme one: Nature of supply

Changing provision over time

- 1.1. The nature of provision for children in care has changed over time in response to changing policy drivers and financial factors.
- 1.2. Sir Martin Narey highlights in his [2016 report](#) that the use of residential care in England peaked in the mid-1980s, with around 40,000 children (40 per cent) in these placements. Placements in children's homes fell following an [increasing desire to support children in family settings](#), and the uncovering of a series of child sexual abuse scandals in children's homes. In 2020, [6,780 \(8 per cent\)](#) of children in care lived in children's homes subject to children's homes regulations.
- 1.3. There has also been a shift in the types of properties registered as children's homes. In 1988, [52 per cent of children in residential care lived in homes accommodating 12 or more children](#), but this preceded a trend towards smaller homes. In 2020, the [average new children's home had 3.5 places](#), while the average closing home had 4.
- 1.4. The falling use of residential care has been mirrored by a growth in the use of fostering placements. While 50 per cent of children in care were [fostered in 1985](#), this had increased to [72 per cent by 2020](#).
- 1.5. Increasing numbers of young people are also being placed in independent and semi-independent (unregulated) accommodation. [Research for the Department for Education](#) (DfE) has found that even over the last five years, the number of looked-after children in semi-independent accommodation has more than doubled.
- 1.6. This increasing use of unregulated, and in some cases unregistered, accommodation is being driven by a [range of factors](#), including insufficient regulated and secure provision, the number of 16-17 year olds coming into care

for the first time, and increasing numbers of unaccompanied asylum-seeking children in care.

- 1.7. The ownership of provision has also changed over time. In residential care, three quarters of children's homes (1,815) are now [run by private companies](#). Around a [third of fostered children](#) are placed through independent fostering agencies (IFAs). We are also seeing changes in the providers themselves. For example, between 2015 and 2019, 29 different legal entities [consolidated into just 16 different groups](#) providing large numbers of placements.
- 1.8. This changing ownership has several drivers. One of these is around funding, with local authority funding under increasing pressure as central government grants have fallen and demand for services has increased. Outsourcing the provision of children's homes in particular was initially seen as one way of managing these pressures, with privately run homes often cheaper at the time (for reasons including [higher rates of pay](#) in local authority run homes and [cost efficiencies](#) in private sector provision) and a reduction in financial risk for the council.
- 1.9. These financial challenges have also led to the reduced ability of councils to invest in new provision, though as councils have faced increasing challenges to find appropriate children's homes placements, we are increasingly seeing councils re-invest in their own children's homes. Conversely, children's social care services have increasingly been seen as a low-risk investment opportunity for private equity and stock market-backed groups given the increasing need for these services.
- 1.10. A mixed market of provision, incorporating local authority and independent provision, can help to make sure children are quickly found homes that best suits their needs. For example, a private or voluntary sector provider may have specialist expertise or may be able to focus on delivery of particular placement types, ensuring a breadth of placements available. However, our members are increasingly concerned about the balance of provision, in particular the growth and market share of the very largest providers which limits councils' ability to manage the market and ensure the availability of placements to meet the needs of the children they care for.

Sufficiency

- 1.11. Councils consistently highlight challenges around the availability of suitable residential and fostering placements. This is in part due to a significant increase in the [number of children in care](#); there were 64,470 children in care in 2010, compared to 80,080 in 2020, a rise of 24 per cent. This also represents an increase in the proportion of children in care, from 57 to 67 per 10,000 children over the decade.
- 1.12. For children and young people, this lack of sufficiency can have a range of negative outcomes. For example, it may lead to children being placed out of area (that is, outside of their home local authority boundaries). In 2020, 42 per cent of children were [placed out of area](#), while 20 per cent were placed more than 20 miles from home. While the first consideration should always be ensuring the right home for the child wherever that might be, there is also [evidence](#) that out of area placements can bring with them risks. These include the risk of exploitation, feeling isolated from loved ones, and challenges receiving the right support.

- 1.13. A lack of sufficiency can also lead to a lack of stability for children. If children are placed in homes that do not meet their needs, this increases the chance of a placement breakdown. While most looked-after children had one placement in 2019-20, [11 per cent \(8,470\) had three or more](#). Placement instability can [reduce a child's opportunities](#) to develop secure attachments and exacerbate existing behavioural and emotional difficulties. They can also result in worse psychological, social and academic outcomes. [Children themselves](#) highlight the negative impact on their own mental health and relationships of multiple placement moves.
- 1.14. Councils report acute challenges around placements for young people with particularly complex and/or challenging needs. A chronic shortfall in secure welfare accommodation and inpatient children's mental health facilities is placing significant pressure on specialist fostering or children's homes placements. Councils also report some children's homes providers being unwilling to offer placements to these children in case the challenges of supporting them lead to a falling Ofsted rating. Providers express concern that this could in turn lead to fewer referrals, as many councils prefer to place only in 'good' or 'outstanding' homes, which would clearly impact on the financial viability of the home.
- 1.15. Where provision cannot be found, councils can be forced to place in unregistered or unregulated placements. These placements are often short-term while a long-term placement is found, resulting in a lack of stability for the young person, and they have not gone through the rigorous Ofsted registration and inspection regime to ensure their suitability to care for children.
- 1.16. From the perspective of local authorities, this insufficiency can drive higher prices and a lack of choice over placements. Councils have a responsibility to find suitable homes for the children in their care, but in some cases report being unable to do so, despite in some cases making [national searches lasting several weeks](#). Councils also report feeling they have no choice but to pay very high prices for placements where there are no other options, putting pressure on already strained budgets and diverting money away from supporting other children.

Staying Put

- 1.17. Pressure has also been put on placements as a result of the [Staying Put](#) policy. Since May 2014, fostered young people in England have had the right to stay with their foster families beyond the age of 18, where both parties agree. This is a welcome policy, providing former looked-after children with a stable home and support in the same way that most of their peers will have.
- 1.18. However, while they are in these placements, this means the placement is not available to a looked-after child. [Ofsted reports](#) that 8 per cent (1,335) of fostering placements not available for use in 2019 were unavailable because they were being used as staying put places.
- 1.19. The [proportion of young people Staying Put](#) with IFA carers was 42 per cent in 2019, while the proportion who stayed living with local authority foster carers was 58 per cent.
- 1.20. We have concerns that the funding of Staying Put limits the opportunities for young people to remain in their placements, impacting on their outcomes. [Research by Action for Children](#) found that while the Government paid local

authorities £33.28 million to implement the policy in 2020/21, the actual cost to councils of payments to foster carers was likely to be £51.4 million, a gap of over £18 million. Funding is also currently only announced on an annual basis, leaving uncertainty over how the policy will be funded each year.

- 1.21. This inadequate funding means that payments to carers can drop when the young person reaches 18. [The Fostering Network](#) found that 54 per cent of local authorities reported a reduction in allowances compared with pre-18 foster care allowances (figures for payments by IFAs were not included in the research), and that in [almost a quarter](#) (24 per cent) of cases where a young person did not stay put, this was because foster carers could not have afforded the drop in income they would have experienced.

Status of provision

- 1.22. The impact of the status of providers is varied, and an area in which we have called for more research. In particular, we are keen to understand the impact of changing ownership of provision on children's experiences and outcomes.
- 1.23. Ofsted ratings do not reveal significant differences in quality between different provision under different ownership. However we believe it would be helpful to consider a wider range of measures when considering the quality of provision, for example the educational progress and health outcomes of children cared for by providers, and feedback from children themselves.
- 1.24. It is likely that increasing privatisation of children's homes provision is leading to the unequal geographical distribution of children's homes. As [Ofsted reports](#), a quarter of all children's homes are in the North West region, compared to only one in 19 in London. This reflects [property prices](#), with homes clustering in regions where property is cheaper. While individual local authorities and small providers have incentives to develop local provision, this is less of a driver for some larger groups who operate nationally or across multiple regions.

Private equity

- 1.25. The ultimate aim of private equity (PE) investment is to grow and create value within a business in order to deliver a return on investment when that business is sold on.
- 1.26. The features of children's care homes and fostering agencies that attract PE investment, therefore, are those that support this ambition. Increasing numbers of children in care and a shortfall in provision, alongside councils' responsibility to ensure that children in care have the best homes to meet their needs and their limited ability to invest in their own provision, reassure investors that the 'market' is likely to continue to grow.
- 1.27. PE are likely to have a shorter-term investment horizon than other types of providers, given that their business model relies on the sale of the company onto other investors within a relatively short period. Work published by Revolution Consulting for the LGA, for example, outlines [PE investment in the fostering agency NFA](#). After initial PE investment by Sovereign in December 2006, NFA was bought by Graphite in January 2021, who sold it to Graphite in April 2015.
- 1.28. While this could potentially limit significant long-term investment, the ambition to secure a profitable sale of the business means that owners must be able to

demonstrate that the business is successful and has longevity, including ensuring that adequate Ofsted ratings of services are achieved.

- 1.29. We encourage the review to consider whether this need to maintain a certain level of service discourages innovation or offers of places to children with more complex or challenging needs (as outlined at 1.14), or conversely, whether having large portfolios may afford a level of freedom to innovate and expand.
- 1.30. [Research for the LGA](#) identifies that PE-owned provision carries a higher financial risk profile than other types of providers. Four of the seven largest groups of independent providers carry more debts and liabilities than tangible assets, with all of these being PE-owned. In total, six of the twenty groups of providers (the largest in the market) in the study reported negative net assets, with all but one of these having PE ownership. The research also notes that stock markets tend not to support the higher levels of external debts that are seen amongst private equity provision.
- 1.31. We have called for national oversight of the largest providers, similar to the role the Care Quality Commission (CQC) holds for adult social care provision.
- 1.32. The collapse of adult care home provider Southern Cross in 2011 led to a legal duty for the CQC to monitor the financial health of the “most difficult to replace” adult social care service providers. However, no such duty exists for children’s social care providers.
- 1.33. We would like to see a role introduced to oversee the financial health of large children’s social care placement providers to prevent a ‘Southern Cross situation’ in children’s social care, and also incorporate consideration of how mergers and acquisitions impact on quality of care and the experiences and outcomes of children.
- 1.34. We must emphasise that the drivers and ambitions of PE investors should not be interpreted as those of foster carers or children’s homes staff, or those supporting them. While the overarching ambition of PE companies is to achieve a return on investment, we know that there are thousands of carers and staff on the frontline and supporting those staff whose ambition is to achieve positive outcomes for the children in their care, and to give them the best possible home.

2. Theme two: Commissioning

- 2.1. Councils that commission children’s services have a key role in designing and commissioning innovative, safe and outcome-focused provision for children in their care. They work with their communities and partners to develop this provision, seeking to support children, young people and their families close to home wherever possible and appropriate to do so. The voices and experiences of children and young people are also key to this process.
- 2.2. Local authorities have a duty to spend public money in the best possible way. With councils facing rising demand for children’s services, continued pressures for efficiencies and having to work with ever-tighter budgets, it is important that commissioners are working to ensure that every penny counts and that interventions improve children’s outcomes.
- 2.3. Issues impacting on the way commissioning has developed, and continues to develop, are covered elsewhere in this submission, including the increasing

complexity of need amongst children coming into care, increased demand and the changing ownership of provision. Looking forward, proposals within the Government's 'Transforming Public Procurement' Green Paper are likely to impact on commissioning practice. For example, it is proposed that healthcare services will not be part of the public procurement regulations, meaning that health and children's social care will be operating to different regulations when procuring support for children in care.

- 2.4. Councils report that placement costs across both fostering and residential care have increased in recent years. This is likely to be as a result of several drivers, including rising costs for support within placements, costs to providers to comply with national policies such as the national minimum wage and automatic pension enrolment, and demand outweighing supply for placements, enabling higher prices to be charged. To help address the latter, we have called for increased transparency of pricing to ensure that spending is directed at improving children's outcomes and experiences.
- 2.5. Commissioners of children's services highlight the challenges of this being a "demand-led" service, with the level and type of future demand unclear. Issues include:
 - a) Variation in rates of demand in different areas, driven by a range of factors including levels of deprivation and geography
 - b) Increasing numbers of unaccompanied asylum-seeking children
 - c) Rising referrals and numbers of children on protection plans and in care
 - d) Changes in how we support children and young people, for example increased recognition that children affected by child criminal and sexual exploitation are victims first rather than offenders
 - e) Changing needs of young people, including as a result of changing threats such county lines and online grooming
 - f) Lack of data or projections around the needs of children to inform future planning.
- 2.6. Uncertainty of future funding is also a challenge. Annual funding rounds alongside falling funding for councils and overspends on children's services make medium- to long-term commissioning strategies challenging to develop.
- 2.7. There are examples of good practice in tackling these challenges. For example, Suffolk County Council's Residential Review in 2019 consulted staff, children and young people in their homes, reviewed the market for residential provision across the county and worked with colleagues in public health to inform their conclusions. This led to additional funding for provision, the introduction of trauma-informed care and implementing reflective practice sessions for staff, amongst other improvements.
- 2.8. In Hertfordshire, a three-year strategy for residential provision was introduced as part of an overarching "Children Looked After Sufficiency" invest-to-save programme. This included investment in new children's homes, a programme of professional development for the residential children's care workforce and the co-development of services with health and education, including 12 week placements for children stepping out of/at risk of admission to Tier 4 Child and Adolescent Mental Health Services.
- 2.9. We have seen some councils attempt to control spending in this challenging financial climate by capping fees paid to providers. However, there is increasing recognition that this can drive smaller, potentially high quality, providers from

the market or into mergers as capped fees are more likely to be sustainable for larger organisations with low-cost business models.

- 2.10. Frameworks are widely used across children's services to secure placements and are often set up across local authority consortia. However, many placements are still made via spot purchasing, which is driven in part by the need to find suitable placements for growing numbers of children with complex needs. Moving away from a reliance on spot purchasing and moving towards greater levels of needs assessment and better demand forecasting, will require investment and the opportunity to plan over a longer-term.
- 2.11. Many councils are involved in collaborative working to improve commissioning, though there remain challenges as a result of complex local systems and processes. Examples of work positive work taking place include:
 - a) The Children's Cross Regional Arrangements Group (CCRAG). This group is a partnership consisting of Local Authorities from the East, South East and South West Regions of England who are committed to working together to support the sourcing, contracting, monitoring and annual fee negotiations for children's placements in independent and non-maintained special schools and children's residential care homes.
 - b) The London-based Commissioning Alliance which aims to improve outcomes and value from social care markets.
 - c) The West Midlands Commissioning Hub, which provides operational support for commissioning as well as strategic oversight, including looking at quality, sufficiency and data.
- 2.12. We hope that this review, along with the Independent Review of Children's Social Care, will provide vital evidence to address the current imbalance between the cost of high-quality provision, the sufficiency of suitable provision to meet children's needs and the available funding for children's social care. Improved commissioning alone cannot address this fundamental challenge within the system.

3. Theme three: Regulatory system

- 3.1. Councils recognise the importance of Ofsted's role in registering and inspecting children's social care provision, alongside the CQC role where children's homes also provide certain healthcare services. Both organisations play vital roles in ensuring children live in good quality homes that meet their needs.
- 3.2. One of the key concerns raised with the LGA in relation to the interplay between regulators, local authorities and providers is the concern outlined at 1.14 about providers being unwilling to offer placements to children with complex or challenging needs due to a (perceived or real) risk of seeing their Ofsted rating downgraded.
- 3.3. [Ofsted has taken steps](#) to allay this concern, however we continue to see challenges. [Research for the LGA by SECNewgate Research](#) at the end of 2020 identified concerns from providers that "anything that doesn't look like 'standard practice'...may result in provisions being judged as inadequate", and suggested that a more open relationship between the regulator and the market would help to foster more effective provision.
- 3.4. Participants in the same research suggested greater flexibility in the way that Ofsted works with providers would be helpful. They suggested that the

requirement to have everything set up in advance of registration, including a children's home manager, and the length of the registration and approval process itself, were too onerous and placed significant financial pressures on providers. This could impact the ability of smaller providers to establish new provision. It was noted, however, that Ofsted had adapted processes to expedite registrations during the Covid-19 pandemic which could inform future approval practices. It would be helpful for the CMA study to consider how lessons from the pandemic were being taken forward, to encourage the development of more high-quality provision.

- 3.5. Where local authorities use unregulated placements, they have their own quality assurance and monitoring processes in place to ensure that these are appropriate. [Guidance from Hampshire County Council](#) offers an example of the processes involved in such placements.
- 3.6. The LGA welcomes plans by the DfE to introduce minimum standards for independent and semi-independent (unregulated) accommodation. All young people deserve to live in homes that are safe and welcoming, and where they can receive the support they need. Many providers are already delivering high quality support and accommodation to young people, and it is right that a clear statement be made that poor standards are unacceptable.
- 3.7. There is a risk that some providers may increase prices as a result of the implementation of these standards, or that some providers may withdraw from the market. Neither of these risks is a reason not to implement minimum standards. However the Government must recognise these risks and work with councils and providers to ensure that they do not impact upon the availability of good quality accommodation for young people where and when they need it, and that councils have the available funding to pay for this.

4. Theme four: Pressure on investment

- 4.1. [Research for the LGA by SECNewgate Research](#) identified five key barriers to investment in new children's homes by local authorities or smaller independent providers:
 - a. The perceived role of children's residential care as part of the wider system of support for children and young people
 - b. Making a robust business case for investing in children's residential care
 - c. Having the necessary infrastructure, management and staffing in place
 - d. Complexity of presenting needs among children and young people
 - e. Co-ordinated and strategic commissioning practices.
- 4.2. The perceived role of residential care as a placement of last resort can discourage investment. The research identified that children could be placed in several foster care placements before being placed in a children's home, due to a desire to raise children in family settings, a belief that children placed in children's homes achieve worse outcomes, and because foster placements are on average 5-6 times cheaper.
- 4.3. However, where these placements are unsuitable and children are then placed in residential care, this can mean those children need more support due to the experience of several failed placements, and their outcomes can be poorer as a result. This reinforces the vicious cycle in which children's homes are seen as more expensive and leading to worse outcomes, and in which investment is limited thereby reducing the opportunity to improve quality.

- 4.4. In order to secure public or private funding to invest in new children's homes capacity, any provider including a council must make a robust business case. This not only reassures lenders about their investment (or the public about use of public money), but ensures financial planning is adequate to enable the delivery of good quality provision and to avoid a home closing abruptly, causing disruption for children.
- 4.5. Looked after children have a wide variety of needs, and it is important to ensure that each child lives in the best home to meet those needs. When accepting a referral for a child, a children's home provider must also consider the needs and behaviours of children already living there to ensure all children can thrive in the home. As a result, while the number of children entering care is increasing, this does not guarantee placements in a children's home.
- 4.6. This situation favours larger providers over smaller ones and councils. Large providers are able to balance financial risk against a larger portfolio and often have significant financial backing. In addition, smaller providers may have higher costs per placement without economies of scale (for example, shared administrative costs or more places to spread financial risk across), and so can be effectively 'priced out'.
- 4.7. An independent review of the future funding outlook for councils by the [Institute of Fiscal Studies](#) in September 2020 found that councils could face a funding gap (that is, between available funding and what needs to be spent to maintain current service levels and quality) of £9.8 billion by 2023/24. In this climate, additional investment by local authorities is exceptionally difficult.
- 4.8. Furthermore, short-term funding settlements for local authorities make it challenging for councils to plan long-term. [We have called](#) for the Government to commit to a three-year local government funding settlement to enable councils to set reliable medium-term financial strategies.
- 4.9. Local authorities' ability to find the capital funding necessary to invest in its own provision is hampered by lack of revenue funding to meet ongoing costs. The prudential regime for local authority capital finance enables councils to borrow to fund capital investment, but in order to do this they need to have sufficient revenue funding secured to cover the long-term costs. The lack of certainty over this affects the capacity for capital investment in services such as children's homes.
- 4.10. Identifying suitable properties in which to establish children's homes can be extremely challenging. The [SECNewgate research](#) identified that finding properties of a suitable size and in a suitable location could be extremely difficult, especially in those areas where such properties were very expensive. Additional challenges were then faced in achieving planning permission, with considerable opposition reported from local communities who have concerns around anti-social behaviour, increased traffic and/or the potential impact on house prices.
- 4.11. A further challenge was in terms of recruiting experienced staff, in particular suitably skilled children's homes managers. Participants in the research identified a need to validate the role of residential children's care as an important part of the wider system to open the door to greater professionalisation, reward and recognition of staff in care settings.

- 4.12. As outlined at 3.4, the need to have both the property and staff in place ahead of registration – with no guarantee that registration will be successful – is more of a barrier to smaller providers than larger ones, especially those without prior experience around what is required to achieve registration.
- 4.13. Councils report increasing complexity and severity of need amongst children and young people in care, for example in relation to mental health issues, self-harm and violent behaviours, and the impacts of sexual and criminal exploitation. Councils also point to a fall in the number of young people in the youth justice secure estate, and the insufficiency of inpatient mental health facilities, which is likely contributing to this increase.
- 4.14. Developing provision that effectively meets the needs of these children and young people is complex, and requires input from a range of stakeholders, in particular health services. Councils report frustration in engaging with health services in some cases to ensure appropriate provision, with differing priorities and significant pressures on budgets leading to siloed working. Councils report that they often find themselves paying for health services in the absence of investment by the NHS.
- 4.15. Commissioning is often highlighted as a challenge in terms of ensuring the availability of the best provision for children and young people in care, both in fostering and children's homes. This is discussed in more detail in section 2.
- 4.16. Local authorities are working hard to expand their use of in-house foster carers to try to bridge the gap in sufficiency and ensure children can be placed with suitable carers. The [number of approved foster carers](#) in both local authority and IFAs increased by 2 per cent last year.
- 4.17. Councils report that in-house fostering placements can be significantly cheaper than placements with IFAs, though there are a range of challenges in relation to costing placements, including the issue of how overheads are accounted for and ensuring that placements are being compared like-for-like. Despite these challenges, cost remains a driver of work to expand in-house provision.
- 4.18. There are a range of challenges to recruitment. In some areas, high property prices mean that it can be difficult for potential foster carers to afford a home with a spare bedroom. Remuneration can also be an issue; the [Fostering Network](#) reports that six out of 10 foster carers say that their allowances do not meet the full cost of caring for a child. [Significant funding challenges](#) in children's social care mean that raising these allowances is exceptionally difficult for local authorities.
- 4.19. We have [called on the Government](#) to commit to a national recruitment campaign for foster carers, to provide the reach and coverage that individual local authorities may struggle to achieve, along with additional expertise.

Children with the most complex or challenging needs

- 4.20. We are keen to discuss with Government the potential for a national approach to investment and coordination of provision for children and young people with the most complex and challenging needs. This would include all children in welfare secure settings and those who are just below this threshold. This is a relatively small number of children, but they require intensive, specialist support in placements that are very expensive.

- 4.21. In 2020, [89 children](#) were placed in secure children's homes (SCHs) by local authorities on welfare grounds. [Research by the What Works Centre for Children's Social Care](#) found that two in five young people referred to secure children's homes were not found a place and were instead placed in alternative accommodation, such as a children's home or foster care. One in ten were placed in a youth offending institution. This highlights the insufficiency of SCH placements.
- 4.22. All but one of England's 14 SCHs are run by individual local authorities. These authorities are holding the financial risk of running this provision, along with ensuring the safety and wellbeing of the children in their care, on behalf of 152 councils. The current approach of relying on a very small number of individual councils to run a national service does not support the necessary expansion of services, and means children placed in these settings are often very far from home.
- 4.23. The approach to supporting these young people is currently very fragmented, while the costs of doing so are putting some local authority budgets under enormous pressure. It is absolutely right that these children are properly supported, at whatever cost, however there is a broader question around whether this provision should be a national service due to the small numbers and need for very specialist support.
- 4.24. We are also interested in the longer term in opportunities to consider how all secure placements are provided. Around [1,340 children were living in secure accommodation](#) in 2019, of which 715 had been sentenced or remanded by a court, 544 were on mental health wards and 81 in secure children's homes for welfare reasons. A further group of children are deprived of their liberty either under the 'inherent jurisdiction' of the high court, where no existing piece of legislation allows for the child to be deprived of liberty, but where this is deemed necessary to keep them safe. This is often used where a place in an SCH is not available.
- 4.25. These young people all need specialist support, and often have similar needs. A child may end up in a particular type of provision purely as a result of where their needs were first recognised – whether that is through contact with the youth justice system, via mental health services or a referral to children's social care – rather than being strictly driven by their needs. This provision is overseen by three different government departments and commissioned by different agencies locally. Improved join up could help to ensure children get the right support for their needs, leading to better outcomes overall.