



Department
for Education

Children's homes workforce: Call for evidence

**Analysis of responses and findings
from the literature review**

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Government
Social Research

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Consultants

The Call for Evidence was conducted by DfE in collaboration with two independent consultants: Dr Joanna Horne and Andrew Rome.

Dr Joanna Horne

Dr Joanna Horne is a Chartered Scientist and Chartered Psychologist working as an independent research consultant, primarily within the fields of education and psychology. Joanna's role within this Call for Evidence included: the review of pilot study responses; development of the final questions (in terms of response format, scope of responses for closed questions, readability, neutrality, specificity and question order); analysis of data using the statistical and data science software R; primary authoring of the report.

Andrew Rome

Andrew Rome is a Consultant and Chartered Accountant with specific experience of the children's services sector and, in particular, extensive research background in the provision of Children's Homes and other residential services. Andrew's role within this Call for Evidence included: development of the initial questions in consultation with stakeholders from around the sector; conducting the pilot study; second authoring of the report.

Acknowledgments

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Executive summary

Background

The Department for Education conducted this Call for Evidence in response to a recommendation made by the Independent Inquiry into Child Sexual Abuse (IICSA), in its [Interim Report](#)¹ published in April 2018, that the Government should introduce professional registration requirements for those working in care roles in children's homes. Specifically, the recommendations were that:

- The Department for Education introduces arrangements for the registration of staff working in care roles in children's homes;
- Registration should be with an independent body charged with setting and maintaining standards of training, conduct, and continuing professional development, and with the power to enforce these through fitness to practise procedures; and
- Recognising that registration may require a period of phasing in, priority should be given to professional registration of children's home managers.

The [DfE response to the Interim Report](#)² committed to explore the merits of further workforce regulation and the potential impact of taking the recommendation forward, through an evidence gathering exercise – in the form of a literature review and this Call for Evidence, through which input was sought from the sector.

Methodology

The questions within the Call for Evidence were developed by DfE in partnership with the independent research consultants and the sector, to ensure questions were focussed on the most critical children's homes workforce issues. The final Call for Evidence comprised 27 questions, including 9 background / demographic questions, followed by 11 open-ended questions and 7 closed (i.e. multiple choice) questions. The questions covered workforce regulation, approach to registering managers of children's homes, qualifications and training, professional standards and unregulated provision. The complete list of questions included in the Call for Evidence can be found in Appendix A. The Call for Evidence was available for respondents to complete on Citizen Space from 6th June 2019 to 27th August 2019. This was publicised widely by DfE, Ofsted and sector networks (ADCS, ICHA, SAN, LGA).

Responses

The number of responses to the Call for Evidence was 90, with 87 respondents providing responses to the specific questions and three organisations providing open responses. Responses mostly came from individuals, rather than organisations. The majority of respondents were either a Registered Manager of a children's home or a

¹ [Interim report of the Independent Inquiry into Child Sexual Abuse](#)

² [Government response to the Interim Report by the Independent Inquiry into Child Sexual Abuse 2018](#)

Responsible Individual for a children's home. The majority of organisations represented were either children's home providers or children's homes.

Limitations

The number of respondents to the Call for Evidence was lower than expected, which may lower the representativeness of the results. Furthermore, although the proportions of respondents from different organisational types are reflective of the sector overall, a large number of respondents were Registered Managers or Responsible Individuals for children's homes, and so it would be useful to seek further views from local authorities as commissioners of these services (as there were fewer responses from them).

Analysis

The analysis explores the responses from the consultation using text mining techniques (word and ngram frequency, bigram networks and topic modelling) using the statistical and data science software R. The resulting insights into children's homes' workforce regulation are further brought to life by direct quotes from the responses.

Key Findings

- There was no consensus on whether the existing regulatory arrangements were robust enough to protect children
- There was no consensus on whether the current mandatory qualifications were sufficient for people in care roles
- The majority of respondents felt that professional registration would improve recruitment / retention of the workforce
- The majority of respondents felt that the current approach to registering managers was robust enough to protect children [NB it should be noted that a large proportion of respondents were in managerial positions (Registered Managers / Responsible Individuals for children's homes) and were, therefore, commenting on their own profession]
- The majority of respondents felt that the current mandatory qualifications were sufficient for registered managers [NB it should be noted that a large proportion of respondents were in managerial positions (Registered Managers / Responsible Individuals for children's homes) and were, therefore, commenting on their own profession]
- There was a consensus that there should be other forms of training available to ensure that staff are competent and deliver high quality care
- There was a consensus that professional standards should be established for people in care roles in children's homes.

Workforce regulation

Respondents had very mixed views as to whether the existing regulatory arrangements for the children's homes' workforce were robust enough to protect children, although respondents from Local Authorities all agreed that they were. Those who thought that existing regulations were not robust enough highlighted the inadequacies of DBS checks and suggested that improvements were required in training / qualifications, professional development, recruitment and the regulation of managers, in order to care for and protect vulnerable children and bring England in line with the devolved administrations.

Respondents proposed that the potential benefits of establishing professional registration requirements for registered managers included increased professionalisation (in terms of standards, status and development), more highly skilled managers and increased public confidence. Respondents gave similar responses with regard to establishing professional regulation requirements for people in care roles, although there was less focus here on professional status and more focus on experience, quality care, and safer recruitment / child protection.

The potential drawbacks of establishing professional registration requirements for registered managers, raised by respondents, included cost and time implications, impact on recruitment and increased training requirements. These concerns were also raised with regard to establishing professional registration for people in care roles. However, respondents also noted that registration may result in a loss of experienced care workers and that individuals may be put off this challenging role, so training support, terms and conditions would need to reflect this.

Almost three-quarters of respondents suggested that professional registration would improve safeguarding as a result of more stringent checks, better training and regular Continuing Professional Development (CPD). It was also felt that child safeguarding had improved in the devolved administrations, where professional registration has been introduced.

More than half of the respondents felt that professional registration would improve recruitment and retention of the workforce, although a quarter felt that it would make it worse.

In terms of other ways of professionalising the children's homes' workforce to protect children, suggestions included more robust recruitment practices, improved training, qualifications and continuing professional development, children's homes being valued more highly by local authorities (rather than seen as a 'last resort') and having more involvement from social workers. However, approximately one-fifth of respondents suggested that professional registration remained the most effective way to protect children, despite the question specifically asking for alternative methods for professionalising the workforce (other than professional registration).

Approach to registering managers of children's homes

More than half of the respondents agreed that the current approach to registering managers was robust enough to protect children. However, one-quarter of respondents disagreed, and suggested that there were issues with the current approach involving Ofsted (time taken and subjectivity of the fit person interview), with suggestions for improvement including professional registration, higher qualifications and improved career development. The vast majority of registered managers of children's homes and respondents from local authorities felt that the current approach to registering managers was robust enough. There were no clear trends for the other role / organisational groups.

Qualifications and training

More than half of the respondents agreed that the current mandatory qualifications were sufficient for registered managers. However, views on the current mandatory qualifications for people in care roles were more mixed, with equal numbers agreeing and disagreeing that these were sufficient. Most respondents felt that there should be other forms of training available, with many supporting the idea of apprenticeships, with some college involvement, covering training in additional areas, and backed up by an enhanced level of CPD.

Professional standards

The vast majority of respondents agreed that professional standards should be established for people in care roles, with no respondents disagreeing with this. Respondents suggested that these should cover continuing professional development, child protection and safeguarding, child development, professional conduct, training, communication, behaviour management, whistle blowing and mental health awareness. It was also proposed that the professional standards could either be in line with those of social workers or in line with the children's homes quality standards.

Unregulated provision

The vast majority (more than three-quarters) of respondents voiced concerns regarding the use of unregulated provision, with the main issues being the lack of checks on providers, the vulnerable age group being accommodated in such settings, a reduced standard of safeguarding and a lack of trained staff. Respondents generally felt that these settings should be regulated.

Conclusions

The key conclusions from the responses to the call for evidence were that establishing professional registration requirements would increase professionalisation and public confidence, enhance child protection and bring England in line with the devolved administrations, but that this would have cost implications and increased training requirements, which would need to be reflected in better pay, terms and conditions. Some major themes were evident in the

responses to several questions, including suggestions of improved recruitment practices, and enhanced training, qualifications and continuing professional development for the children's home workforce, whether or not professional registration were to be introduced. Respondents also raised concerns regarding the use of unregulated provision generally, and concerns about the workforce within it.

The recent literature review commissioned by DfE (RTK, 2019) supports the above finding that consideration should be given to enhancing the opportunities for training and continuing professional development for the children's homes workforce. The evidence from the literature review suggests that any regulation should be supported by investment in training, that capacity-building of professional skills be prioritised to improve standards, and that additional qualification requirements alone may not be effective unless they are part of more systemic changes, with continuing support for staff being critical.

Further considerations

The findings from this Call for Evidence raise several key areas that should be looked at in further detail, with additional input from local authorities, Ofsted and children's homes providers in order to build a better understanding of the issues, with a view to developing an appropriate response. These are:

- Training / qualification issues
- Professional development
- Financial implications of professional registration
- Professional standards
- Unregulated provision.

The children's homes' sector

A children's home is an establishment that provides care and accommodation wholly or mainly for the most vulnerable children in the country. Children's homes vary in size and nature, and fulfil a range of purposes to meet the different needs of children and young people.

According to the [Children's Social Care Data in England \(2019\)](#)³, the number of children's homes in England continues to increase, and as of 31 March 2019, there were 2,304 children's homes (a 4% increase from the previous year). These homes were registered for 12,035 places, a 2% increase from 11,746 as at 31 March 2018. Despite the fall in the number of local authority-run children's homes, the number of children's homes continues to rise at a greater rate than the number of places offered. The inspection profile of children's homes as at 31 March 2019 remains positive overall, with most homes continuing to be judged good or outstanding.

The [Children's Homes \(England\) Regulations 2015](#)⁴, for the first time, introduced Quality Standards for children's homes. However, this only applies to children's homes in England and arrangements differ in devolved administrations. The regulations set out the mandatory qualifications for managers and staff in a care role. Specifically, that managers must hold a Level 5 Diploma in Leadership and Management for Residential Care and staff must hold a Level 3 Diploma for Residential Childcare. The registered person should establish whether other qualifications are equivalent and where gaps are identified, should act to ensure relevant units or qualifications are completed in a timely manner at an appropriate level.

The regulations make clear that the registered person should have a workforce plan which can fulfil the workforce related requirements and maintain good employment practice. It is the registered person's responsibility to ensure that the home has sufficient staff to provide care for each child; that staff have the experience, qualifications and skills to meet the needs of each child and that they make continuous improvements in the quality of care provided in the home.

As children's primary carers, the residential care workforce plays an essential role in achieving the government's vision for children in care. [Sir Martin Narey's review of residential care in England](#)⁵ found that the Diploma qualifications provided adequate baseline knowledge, although there are concerns around the variability in the quality of delivery. In addition, there was no evidence to suggest that an entirely graduate workforce would further improve the quality of homes. Sir Martin also highlighted the positive impact of further training and development approaches such as the RESuLT programme which has been developed by the National Implementation Service. Finally, the review found that one of the greatest workforce challenges is recruiting staff who are able to withstand the demands and sensitivities.

³ [Children's Social Care in England 2019 National Statistics](#)

⁴ [DfE Guide to Children's Homes Regulations including the quality standards 2015](#)

⁵ [Sir Martin Narey's independent review of children's residential care in England 2016](#)

To deliver the changes that Sir Martin envisaged, the government is working in partnership with the sector to deliver sustained improvement in the quality of care for the country's most vulnerable children.

Background to the Call for Evidence

The Department for Education conducted this Call for Evidence in response to a recommendation made by the Independent Inquiry into Child Sexual Abuse (IICSA), in its Interim Report published in April 2018, that the Government should introduce professional registration requirements for those working in care roles in children's homes. Specifically, the recommendations were that:

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- Registration should be with an independent body charged with setting and maintaining standards of training, conduct, and continuing professional development, and with the power to enforce these through fitness to practise procedures; and
- Recognising that registration may require a period of phasing in, priority should be given to professional registration of children's home managers.

In response, DfE committed to explore the merits of further workforce regulation and the potential impact of taking the recommendation forward, through an evidence gathering exercise – in the form of a literature review and this Call for Evidence, through which input was sought from the sector. In addition to developing an understanding of the potential impact of taking forward the recommendation, DfE expanded the scope to seek the sector's views on a broader range of workforce issues.

Children's homes provide care and accommodation for some of our most vulnerable children in society, and it is vital that appropriate safeguards are in place to protect them from harm. Children's homes must have a manager in place, who is registered with Ofsted and has had their fitness to practice assessed. The Registered Manager must ensure that staff have the experience, qualifications and skills to meet the needs of each child. All staff must have enhanced DBS checks before they can work in a children's home, and homes must have policies and procedures in place to protect children, which includes appropriate recruitment practice. Ofsted assesses this on inspection and can take enforcement action where necessary, including removing homes and managers from the register.

Methodology

The questions within the Call for Evidence were developed by DfE in partnership with the independent research consultants and key stakeholders in the sector, to ensure questions were focussed on the most critical children's homes workforce issues. An initial set of questions was drawn up by DfE to cover the scope of the Call for Evidence. Following consultation with contacts within the sector, these questions and answer formats were revised and piloted with a small number (n=5) of respondents. On the basis of the responses to the pilot study questions, and comments from the respondents, a final set of questions was established by DfE and the research associates. The complete list of questions included in the Call for Evidence can be found in Appendix A.

The Call for Evidence was available for respondents to complete on Citizen Space from 6th June 2019 to 27th August 2019. It was promoted via the DfE Twitter account, other Twitter accounts (Minister Kemi Badenoch, Isabelle Trowler and Ofsted), the DfE Local Authority Newsletter, other organisations (the Association of Directors of Children's Services, Ofsted, the Local Government Association, the Independent Children's Homes Association, the Secure Accommodation Network and the Secure Welfare Coordination Unit) and through direct contact with Local Authorities.

Responses completed offline which gave answers to specific questions within the Call for Evidence (n=2) were incorporated into the main data file. Open responses (n=3) could not be incorporated into the data file, so were not included in the statistical or text mining analyses but were studied qualitatively when considering quotes to include within the report. In cases where respondents had answered 'As above' to a question, responses to the previous question were copied over to allow for these to be included within the text analysis.

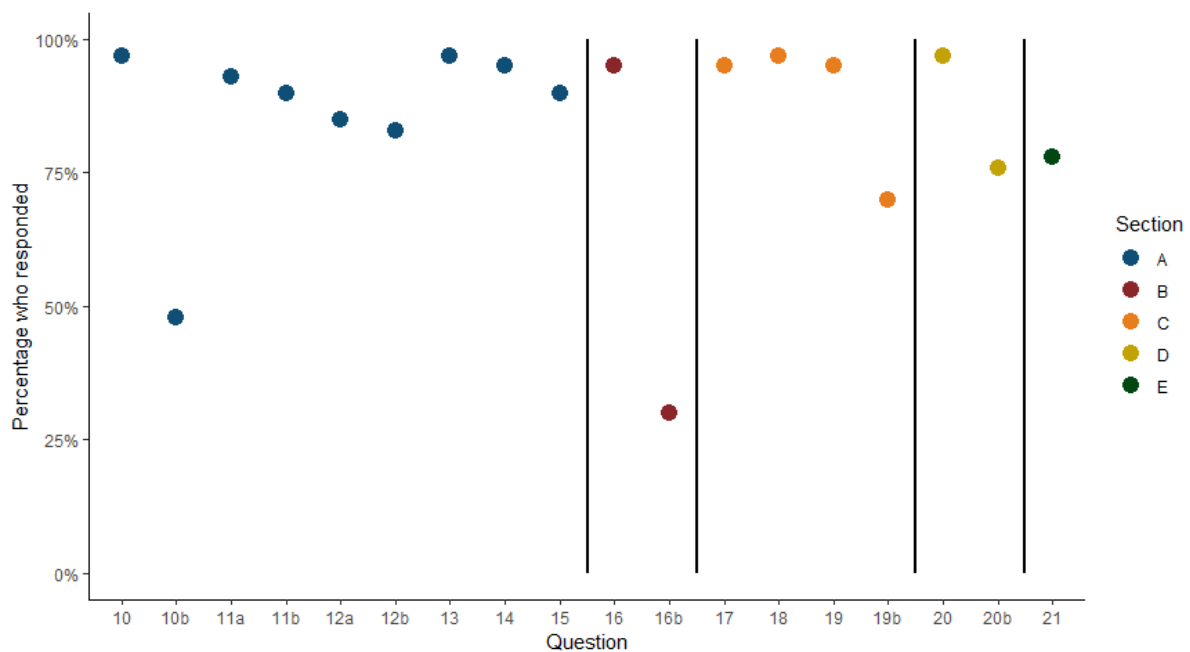
Responses to closed questions were analysed using the statistical and data science software R. Responses to open-ended questions were analysed using a range of text analytics methods in R including word and ngram frequency, bigram networks and topic modelling (see Appendix B for details). Text analytics, or text mining, is a common methodology for use with open response questions. This document also includes quotes from respondents that illustrate the findings from the text analytics exercise to bring responses 'to life'. It should be noted that the quotations are not based on a detailed qualitative analysis. However, once the text mining techniques had identified the main themes within the responses to a question, all responses were read to identify all quotations relating to each theme. Those included within the final report were selected as being broadly representative of the range of responses given.

Contextual statistics

Response rates

The questionnaire for the Call for Evidence was divided into sections: workforce regulation; approach to registering managers of children’s homes; qualifications and training; professional standards; and unregulated provision. Within each section of the questionnaire, responses tended to be maximal for the closed questions (Questions 10a, 14, 16a, 17, 18, 19a, 20a) and lower for the open-ended questions (Questions 10b, 11a, 11b, 12a, 12b, 13, 15, 16b, 19b, 20b, 21), particularly on the contingent questions (Questions 10b, 16b, 19b, 20b) where responses were only required where particular responses had been given on the previous closed question (see Figure 1). Overall, 87 respondents answered at least one question. Additionally, open responses were received from three organisations, giving organisational views without referring to the specific questions within the Call for Evidence.

Figure 1: Percentage of respondents per question and section

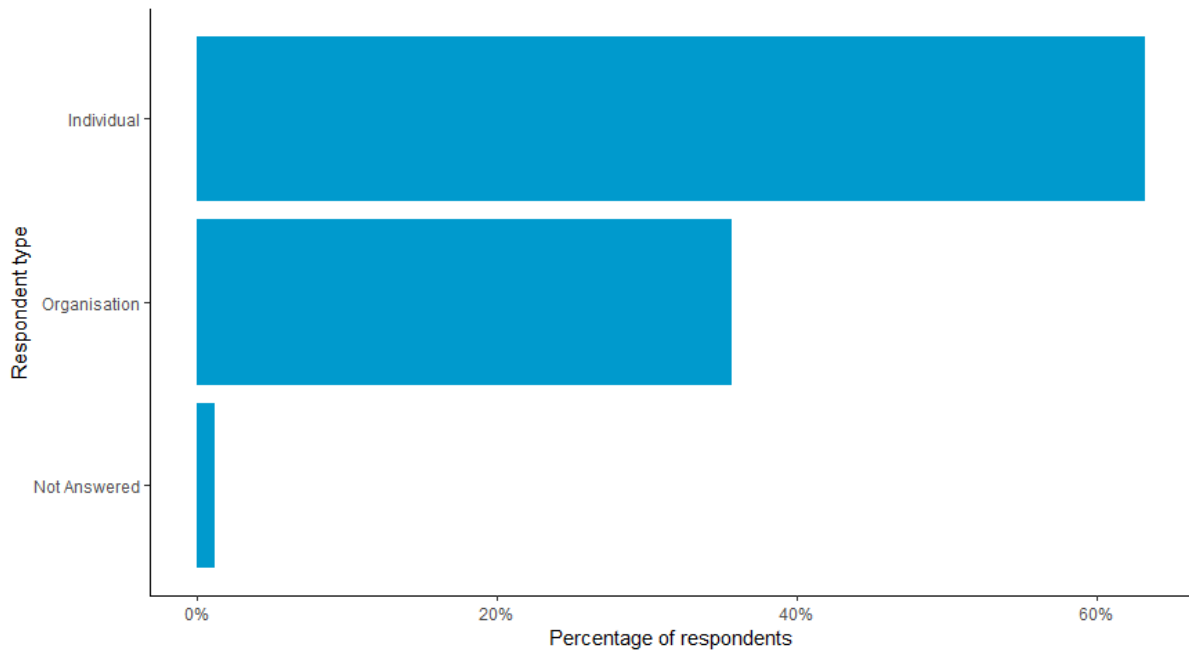


Base: All respondents (n=87).

Respondent background statistics

The majority of respondents (63%) stated that they were responding as an individual, rather than as part of an organisation (36%) (see Figure 2). One respondent did not answer this question.

Figure 2: Type of respondent (individual vs organisation)

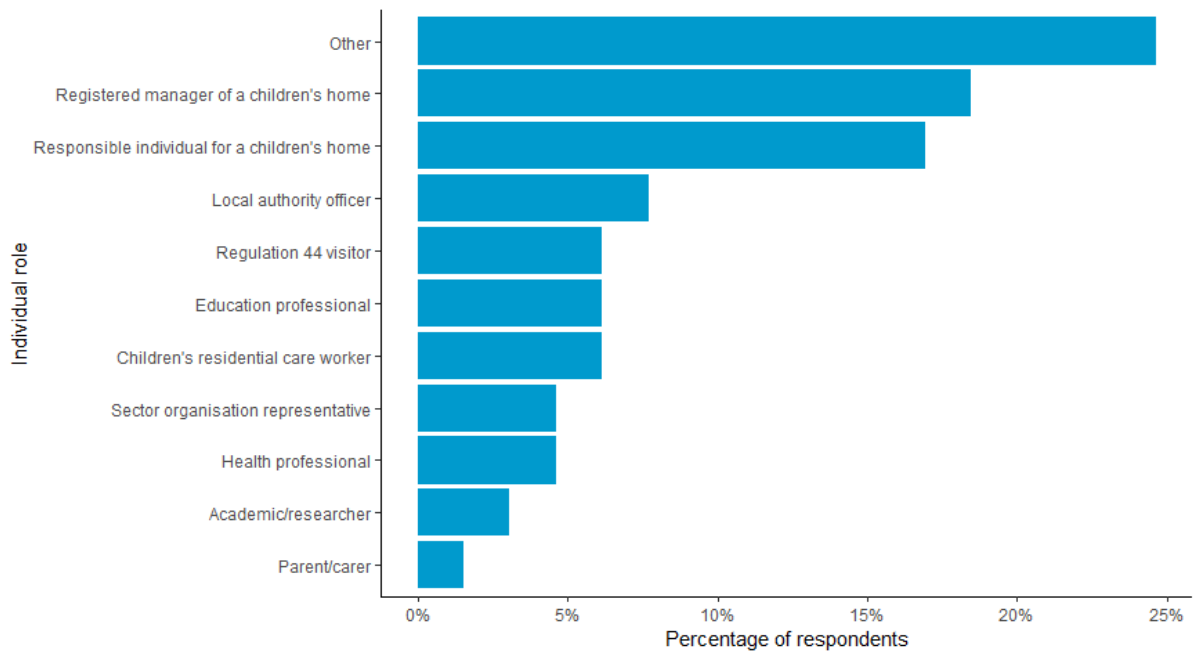


Base: All respondents (n=87).

In terms of roles, a large number of respondents (25% of individuals who answered this question) selected the 'Other' category, although there were also a good number of registered managers of children's homes (19%) and responsible individuals for a children's home (17%). All the remaining role categories each contained less than 10% of the sample (see Figure 3). The respondents that selected the 'Other' option included current / retired social workers, police, counsellors, former children's homes managers and individuals with experience of living in children's homes (n<4 in all cases). Twenty-two respondents did not answer this question as it was aimed at individuals rather than organisations.

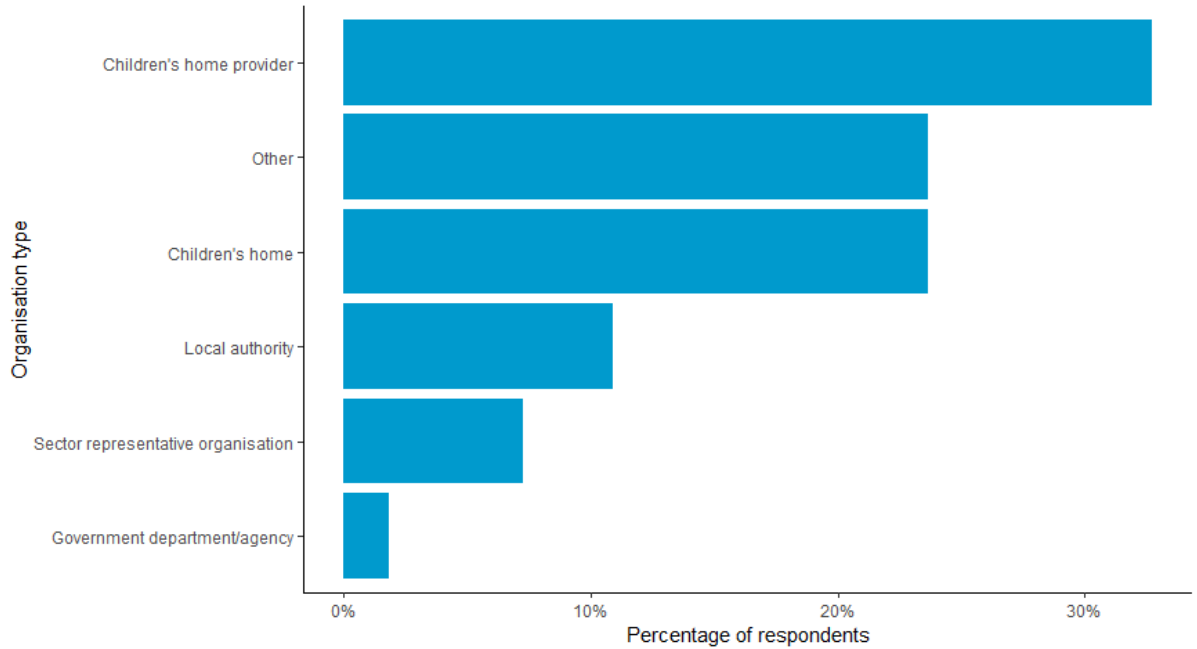
Finally, in terms of the types of organisation represented within the sample, most of the respondents who answered this question worked for either a children's home provider (33%) or a children's home (24%), with a sizeable number of respondents (24%) selecting 'Other' (see Figure 4). Those selecting the 'Other' category were primarily representing charities / voluntary organisations. There were a small number of respondents from local authorities (11%) and sector representative organisations (7%) and very few from government departments / agencies (2%). Thirty-two respondents didn't answer this question, which was aimed at those responding on behalf of an organisation.

Figure 3: Roles held by respondents



Base: All who provided details on their role (n=65).

Figure 4: Organisation type



Base: All who provided details on their organisation type (n=55).

Representativeness of respondents

Although the respondent group was dominated by those representing children's homes and providers, compared to those representing local authorities, this would be expected given the number of children's homes in England (n=2209), compared to the number of local authorities (n=152). The respondent group was, therefore, felt to be broadly a reflection of the different organisations within the sector.

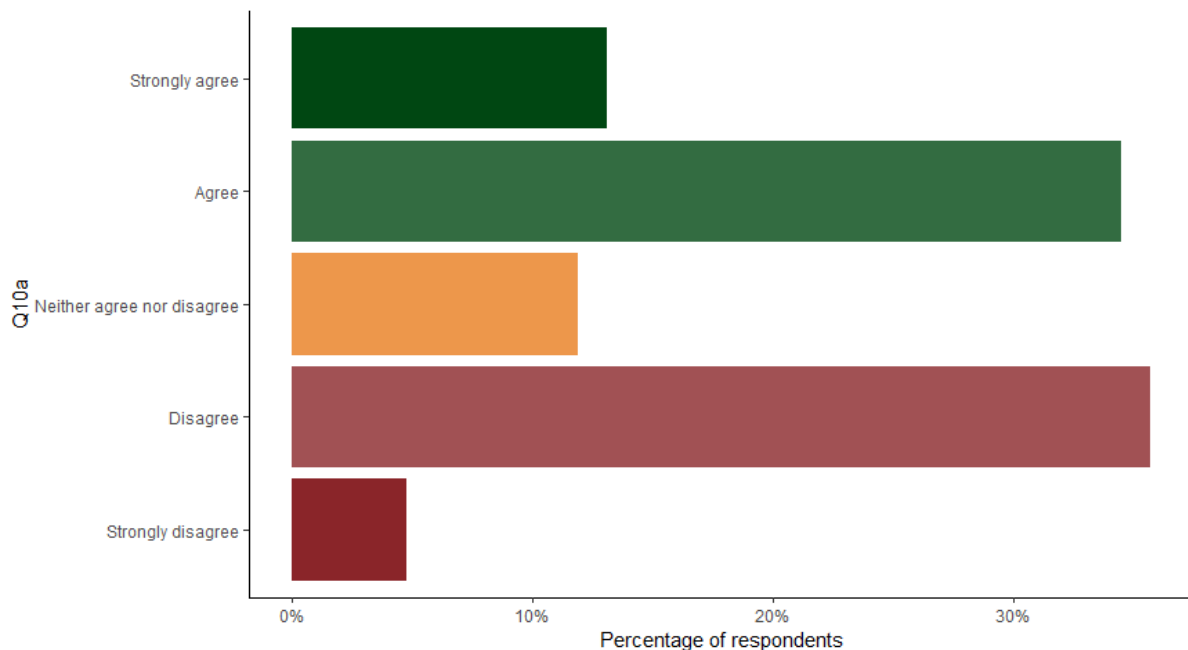
Workforce regulation

The first section of the Call for Evidence covered workforce regulation, and comprised eight primary questions (two closed and six open questions) and one open supplementary question.

Q10a. To what extent do you agree or disagree that the existing regulatory arrangements for the children's homes' workforce are robust enough to protect children?

Eighty-four out of the 87 respondents answered this question. The responses were very mixed, with 48% agreeing (Agree / Strongly agree), 41% disagreeing (Disagree / Strongly disagree), and 12% neither agreeing / disagreeing (see Figure 5).

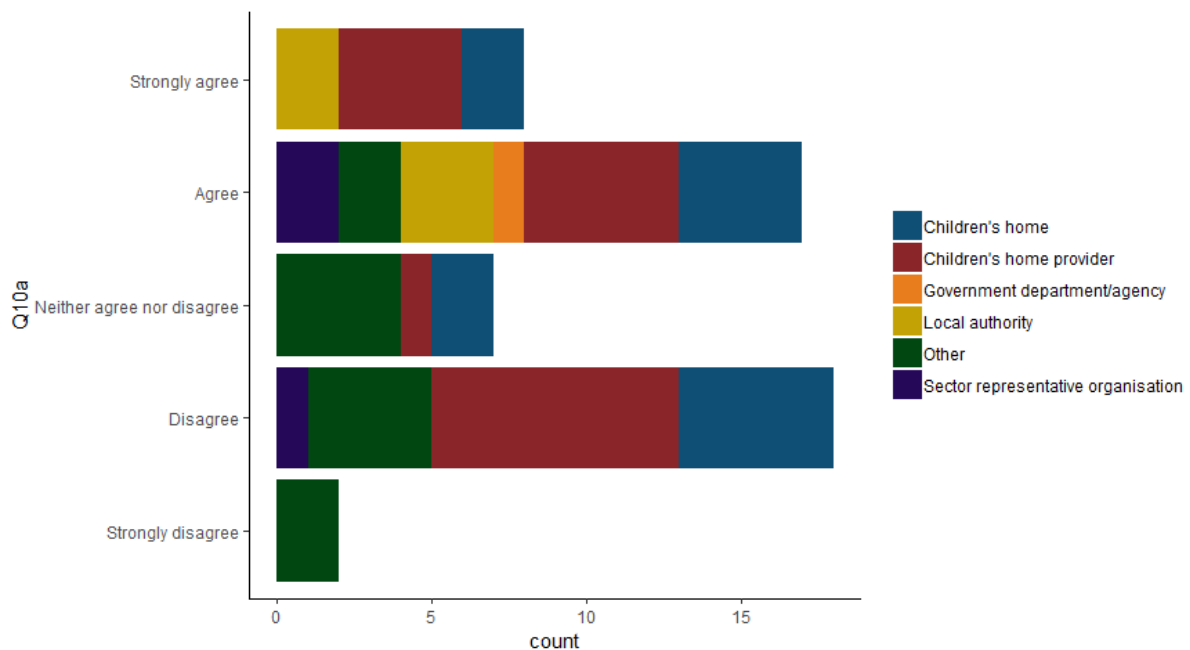
Figure 5: Responses to Question 10a



Base: All who responded to Q10a (n=84).

Analysis of responses to this question according to role of respondent revealed no significant trends, so opinion did not seem to be related to this factor. Analysis of responses to this question according to organisation type revealed no clear trends, other than respondents from local authorities all agreeing / strongly agreeing with the statement that existing regulatory arrangements are robust enough (see Figure 6).

Figure 6: Responses to Q10a according to organisation type



Base: All who responded to Q10a and provided details of their organisation type (n=52).

Q10b. If you disagree, what are the main areas where improvements in workforce regulation need to be made?

There were 42 responses to this question. In describing suggested areas of improvements in workforce regulation, respondents commonly referred to 'register (registration)', 'train(ing)', 'professional', 'recruitment' and 'manager' (see Figure 18 in Appendix C for most common words).

Respondents to this question were generally supportive of professional registration, with comments such as:

I think that having a professional register can only make things safer for children and young people who live in residential children's homes. - *Practice Manager of a children's home*

All children's home managers and staff in care roles should be listed on an open and transparent professional register held by an independent body, which can be accessed by future employers. - *Voluntary and Community Sector organisation*

Improvements in training were suggested, with comments relating to initial training / qualifications, as well as continuing professional development:

The level of core qualification is not high enough and the level and base training in the guidance is not sufficient for children

and young people with ever increasing complex needs. -
Learning and Development Manager

We would like to see strengthened regulation... of mandatory qualifications... as well as how individual homes... provide continuing... professional development... specific to the needs of the young people they support. - *Voluntary and Community Sector organisation*

The responses highlighted the need to both increase recruitment and improve the consistency of information-sharing during the recruitment process. It was suggested that increased regulation could address these issues:

There needs to be a tightening up on references where people change jobs. Very inconsistent, reluctance to share information, inconsistent approach to safer recruitment between organisations. - *Managing Director, Children's home provider*

Creating a regulatory body would allow for standards of professional practice... to be set... This would help address both recruitment and retention issues, provide recognition of skills... and develop opportunities for staff to progress. - *Voluntary and Community Sector organisation*

Respondents particularly noted the importance of further regulation with regard to managers and assistant managers:

The registration of a Children's Home Manager should be independently undertaken... The current arrangements leave homes in a perilous state often noted as being without a registered manager. - *Chief Executive, Children's home provider*

Managers need to be more accountable for the actions and behaviour of their staff and Managers ought to undergo a similar process to that of a Nurse requiring regular, repeat evidence of CPD for validation. - *Community Psychiatric Nurse*

Analysis of the most common bigrams (associations of two words) within the responses reiterates the importance of professional development and also identifies comments relating to DBS checks (see Figure 19 in Appendix C). All the references to DBS checks highlight the limitations of their utilisation in protecting children. For example:

Enhanced DBS checks for staff and Ofsted registration of managers are alone insufficient mechanisms to ensure the protection and promotion of children's physical safety and wellbeing. - *Voluntary and Community Sector organisation*

All staff have to have an enhanced DBS check, but this only tells us if they have been prosecuted/cautioned for an offence... we should be obtaining character references and asking the police if there is any known intelligence on the employee. - *Head of Operations, Children's home provider*

Topic modelling analysis suggests that the two main themes within the responses to question 10b related to i) the care and protection of vulnerable children within residential homes, and ii) the regulation of the workforce in terms of qualifications, registration and professional development (see topics in Figure 20 in Appendix C).

In relation to Topic 1 (Care), responses identified the risks to children in residential care underlying the need for further regulation:

Work conducted since the publication of the Interim Report provides further evidence that children in residential settings are particularly vulnerable to sexual abuse by staff and are in need of improved protection. - *Sector organisation*

Any new developments in regulation must be aimed at building a supported and supporting workforce that seeks to provide children in care with the stable, loving and nurturing home environment they deserve. - *Voluntary and Community Sector organisation*

In relation to Topic 2 (Regulation), respondents highlighted the positive outcomes of workforce regulation, in line with those in the devolved administrations:

Reforms to accreditation requirements, an independent body setting standards of practice, and clarity on career progression can all help build the skills and stability of the workforce. - *Voluntary and Community Sector organisation*

In Scotland... all staff and managers are registered with the SSSC and I feel that with this body having a regulatory responsibility and high expectations, the safeguarding of children is much more robust. - *Responsible Individual for a Children's home*

Q11a. What do you think are the potential benefits of establishing professional registration requirements for registered managers?

There were 81 responses to this question. In describing potential benefits, respondents commonly referred to 'professional', 'train(ing)', 'standard(s)', 'skill(s)' and 'development' (for commonly used words see Figure 21 in Appendix C).

In terms of skills, respondents recognised that professional registration would ensure that Registered Managers have the necessary skills, would attract more skilled professionals and would recognise the level of skill of those fulfilling this role:

More scrutiny and a standardised set of skills and requirements.
- *Parent/Carer*

Other benefits could also include a sense of validation for staff regarding the importance of their skill set and the complex work they do in caring for some of the most vulnerable young people.
- *Voluntary and Community Sector organisation*

Suggested benefits of establishing professional registration requirements for registered managers included 'professional standards', 'professional status', 'professional development', 'additional training' and 'public confidence' (see bigram network in Figure 22 in Appendix C). It is clear that increased professionalism was an important theme in the responses.

Respondents recognised that professional registration of Registered Managers would increase professional standards and provide greater consistency:

If underpinned with a code of practice and professional standards this would enable greater consistency (nationally)... to the leadership and management of children's homes and the quality of care and... professionalise children's home management. - *County Service Manager – Residential Care, Local Authority*

Professional regulation would ensure that registered managers and people in care roles must meet regulated... and continuous professional standards and that they have public protection and quality care at the heart of the work. - *Sector organisation*

Respondents also acknowledged that professional registration would raise the professional status of Registered Managers, in line with other professions:

Confidence in the workforce by raising the professional status and this sends out a message and brings it into line with other professions. - *Head of Residential Services, Children's home*

Greater recognition for the individual giving a professional status.
- *Assistant Director of Commissioning, Local Authority*

Respondents identified that professional registration would allow for increased opportunities for professional development, require the maintenance of professional development and provide evidence of appropriate professional development:

Evidence of membership to a professional registering body... would immediately let employers know that this individual has met the base line... for registration as fit for purpose to role - and maintained this membership by meeting the professional development requirements. - *Quality Assurance Manager, Children's home provider*

The monitoring of professional conduct, development and practice will ensure that managers develop and maintain their practice in terms of management and leadership in order to provide caring, safe and effective care for children. - *Responsible Officer, Local Authority*

Finally, respondents highlighted the increased public confidence that would come from professional registration of managers:

Professional registration... would build and maintain public confidence in those working in children's homes... would introduce a publicly available register of registered residential care workers and managers... Fitness to practise proceedings and outcomes are made public. - *Independent organisation*

Q11b. What do you think are the potential benefits of establishing professional registration requirements for people in care roles?

There were 79 responses to this question. In line with the previous question, respondents commonly referred to 'professional', 'train(ing)' and 'standard(s)', but they also used the words 'quality' and 'experience' (for commonly used words see Figure 23 in Appendix C).

Respondents recognised that professional registration of people in care roles would not only ensure that individuals in these roles have the necessary experience, but would also validate the experience of these key workers:

Ensure that the workforce is suitably qualified and experienced to deal with the complex behaviours presented by young people and approach their care in a suitably informed way. - *Local Authority officer*

Individuals personally recognising the value of their skills and learning. Too often, carers undervalue their skills and experience and still don't consider themselves 'qualified' after completing the Level 3 diploma. - *Director, Children's home provider*

There was, in fact, a high level of overlap between the words used in responses to questions 11a and 11b (see Figure 24 in Appendix C), indicating that respondents generally felt that the benefits of establishing registration requirements for registered managers and people in care roles would be similar.

The bigram network for Q11b (see Figure 25 in Appendix C) also shows some similarities with Q11a, with respondents indicating that the suggested benefits of establishing professional registration requirements for people in care roles include 'professional standards', 'professional development' and 'public confidence'. However, responses to this question also referred to 'quality care', 'safe recruitment' and 'child protection'.

Respondents recognised that registration of people in care roles in children's homes would improve the quality of care and make this more consistent across England:

Professional regulation would ensure that... people in care roles must meet regulated professional and continuous professional standards and that they have public protection and quality care at the heart of the work that they do. - *Sector organisation*

To ensure they are able to provide excellent quality of care for the young people and know how to protect and promote their wellbeing and development. - *Registered Manager, Children's home*

Respondents also acknowledged that registration of those in care roles would promote safer recruitment and enhance child protection:

A register for all... care staff would not only ensure monitoring and accountability of the workforce, but the young people in our care will be better protected by a workforce who are registered and accountable. - *Regional Manager, Children's home provider*

Young people can be assured that the people who are looking after them are safe and qualified. - *Regulation 44 visitor*

Again, there was a high level of overlap between the bigrams used in responses to questions 11a and 11b (see Figure 26 in Appendix C). However, 'professional status' was referred to more frequently in reference to registered managers (Q11a), whilst 'safer recruitment' was referred to more frequently in reference to people in care roles (Q11b).

Q12a. What do you think are the potential drawbacks of establishing professional registration requirements for registered managers?

There were 77 responses to this question. In describing potential drawbacks, respondents commonly referred to 'cost', 'time', 'recruit(ment)', and 'train(ing)' (see Figure 27 in Appendix C for commonly used words).

Respondents noted the time implications of establishing professional registration requirements for registered managers, due to the additional workload that would be placed on them:

Additional requirements for registration... would impact on the time available for managers to do the job. - *Responsible Individual for a children's home*

This could be time-consuming for managers and possibly restrictive on who can be considered for a role. - *Children's home provider*

Analysis of the most common bigrams within the responses reiterates the concerns with 'cost implications', 'training require(ments)' and the 'recruitment process' (see Figure 28 in Appendix C).

Respondents noted the cost implications to individuals (registered managers) and/or providers and the wider impact that this may have on the cost of child placements and the ability to provide services:

Costs which will either be placed on the individual or added to placement costs which are already spiralling. - *Assistant Director of Commissioning, Local Authority*

This... may be expensive for organisations to pay for. The sector is already under financial strain due to local authority budget

cuts, so this could impact the ability of charities and other providers to run services. - *Children's home provider*

There were also potential issues noted with regard to training, particularly increased training requirements, but also concerns with a lack of guidance:

Smaller providers may struggle with capacity in releasing managers to complete any training or evidence requirements. - *Strategic Commissioning Manager, Local Authority*

Companies may "invent" basic training required for registration. There needs to be clear guidelines with what is or isn't deemed necessary training, who should deliver it and what is deemed acceptable study. - *Regulation 44 Visitor*

Some respondents highlighted issues with recruitment, in terms of a shortage of registered managers and potential delays in the recruitment process, that may arise as a result of establishing professional registration requirements for registered managers:

Potentially, additional delays to the recruitment process. - *Responsible Manager of a children's home*

There is already a shortage of RMs... this could exacerbate the situation. It would help if the RM and other care roles were 'championed' by the Department in a similar fashion as teachers and social workers... this includes paying incentives. - *Sector organisation*

Q12b. What do you think are the potential drawbacks of establishing professional registration requirements for people in care roles?

There were 74 responses to this question. In line with the previous question, respondents commonly referred to 'cost', 'recruit(ment)', 'time' and 'train(ing)', but they also used the words 'quality' and 'experience' (see Figure 29 in Appendix C for commonly used words).

In reference to quality, respondents noted that professional registration would have a positive, rather than negative, impact on quality of care and that those people in care roles wanting to provide high quality care would not see registration as a drawback. However, it was noted that there was a potential for the focus to be on minimum standards, rather than quality standards:

None. Can only improve the quality of care given to children due to better understanding, greater pride in role, increased salary and reduce staff turnover. - *Former Registered Manager of a children's home*

I think there will be resistance, but those who genuinely want to provide safe, high quality care will not see it as this [a drawback]. Those who do would probably be better off outside the care industry. - *Head of Operations, Children's home provider*

Respondents expressed some concerns that professional registration would result in the loss of experienced care workers:

Registration could mean that some of the workforce without appropriate qualifications may not be able to register and valuable experience could be lost from the industry or there would be several unqualified registrants. - *Sector organisation*

May increase staff who are good at paperwork or look good on paper rather than good at the job. Those who are good at the job depends on their personality, attitude and own life experiences rather than paper qualifications. - *Doctor seeing Looked After Children*

There was, in fact, a high level of overlap between the words used in responses to questions 12a and 12b (see Figure 30 in Appendix C), indicating that respondents generally felt that the drawbacks of establishing registration requirements for registered managers and people in care roles would be similar.

Analysis of bigrams for Q12b (see Figure 31 in Appendix C) also shows some similarities with Q12a, with respondents indicating that the suggested drawbacks of establishing professional registration requirements for people in care roles include 'cost implications', 'training require(ments)' and the 'recruitment of staff'. However, responses to this question also referred to 'level 3 qualification', 'deter people' and 'challenging role'.

Respondents recognised that many care workers had not completed the Level 3 qualification, and that further support would be required for them to achieve this:

Recruiting experienced staff whom have previously worked in the care sector for over 2 years and do not hold their Diploma... is usually because the company they work for have not been robust in signing up their staff for the qualification. - *Registered Manager of a Children's home*

Some of the people that are the best residential workers have not necessarily had good educational achievement. However, if they are supported to do the level 3 and then register - this would make sense to me. - *Safeguarding Training Officer*

It was noted by respondents that establishing professional registration requirements for people in care roles in children's homes may deter people from joining the workforce, and so terms and conditions would need to be improved to reflect this:

Could put certain individuals off from joining the workforce if recruitment and training standards are set too high. Professionalising the workforce needs to be reflected in terms and conditions. - *Learning and Development Manager*

While professional registration may encourage more people to view care work as a skilled and exciting career path, any measure that places undue burdens on individuals will deter people from entering the workforce and undermine the positive work to raise the profession's status. - *Sector organisation*

This is also related to the fact that this is already a challenging role, and that professional registration could make this more challenging:

The impact of recruitment and retention of staff in an area of work that is both physically and mentally challenging. - *Service Manager, Local Authority*

This would make what was previously a vocational role into a more challenging role which wouldn't be so attractive. - *Director, Children's home provider*

The level of overlap between the bigrams used in responses to questions 12a and 12b (see Figure 32) was lower than for words. 'Cost implication' was referred to more frequently in reference to registered managers (Q12a), whilst 'level 3' and 'challenging role' were referred to more frequently in reference to people in care roles (Q12b).

Q13. How would the introduction of professional registration impact on child safeguarding?

There were 84 responses to this question. In describing the potential impact of professional registration on child safeguarding, respondents commonly referred to 'train(ing)', 'check' and 'improve' (see Figure 33 in Appendix C).

The majority of respondents suggested that professional registration would improve safeguarding as a result of more scrutiny in the recruitment process and more regular continuing professional development:

I think it could improve it if it were regulated. This would insure that staff who have practice issues in a county (not criminalised) are highlighted to other counties. In turn this would help protect our children. - *Registered Manager of a children's home*

If the body responsible for registration carried out regular CPD and competency check it would ensure that those registered were operating at a consistently high standard especially with regard to safeguarding issues. - *Responsible Individual for a children's home*

Respondents recognised that professional registration would have a positive impact on child safeguarding through higher standards of statutory training. It was seen by some respondents that professional registration without the introduction of such training would have little impact:

The introduction of professional registration... would not only improve child safeguarding but promote the overall quality of care provided... ensuring standards of training and conduct are upheld across the sector. - *Sector organisation*

If all staff were registered and... had to complete statutory training and refreshers etc then all staff should at the very least have had the training to identify issues and to endeavour to protect children and young people. - *CEO, Children's home provider*

Respondents suggested that professional registration could improve safeguarding due to additional checks on individuals being available on a national basis. However, a couple of respondents did note that checks were already in place:

Strengthen recruitment – extra layer will put in more checks – career pathway available to see by new/potential employer. - *Sector organisation*

If similar to HCPC this will allow organisations to check on individuals on a national basis, rather than on individual employer basis thus enhancing the relevant checks on potential employees and increasing safeguarding. - *Responsible Individual for a children's home*

The bigram network indicates that respondents referred to a 'positive impact' and also mentioned the devolved administrations (see Figure 34 in Appendix C).

Again, respondents identify the potential positive impact of professional registration on safeguarding, due to more stringent checks, a central register and improved training and CPD:

Professional registration... will have a positive impact on Child Safeguarding. Particularly if there is focus on CPD and a universal training program to ensure every workforce is following the same guidelines. - *Regional Manager, Children's home provider*

I feel it could only have a positive impact on safeguarding. Children looked after are the most vulnerable and this would ensure more stringent checks to ensure workers are safe to work with our children and capable and competent. - *Professional working in safeguarding*

Some respondents also cited evidence of improved child safeguarding in the devolved administrations, where professional registration has already been introduced:

Registered social services workers in Scotland are subject to codes of practice... adherence to a clear set of standards enforced through registration and fitness to practise proceedings promotes safeguarding. - *Sector organisation*

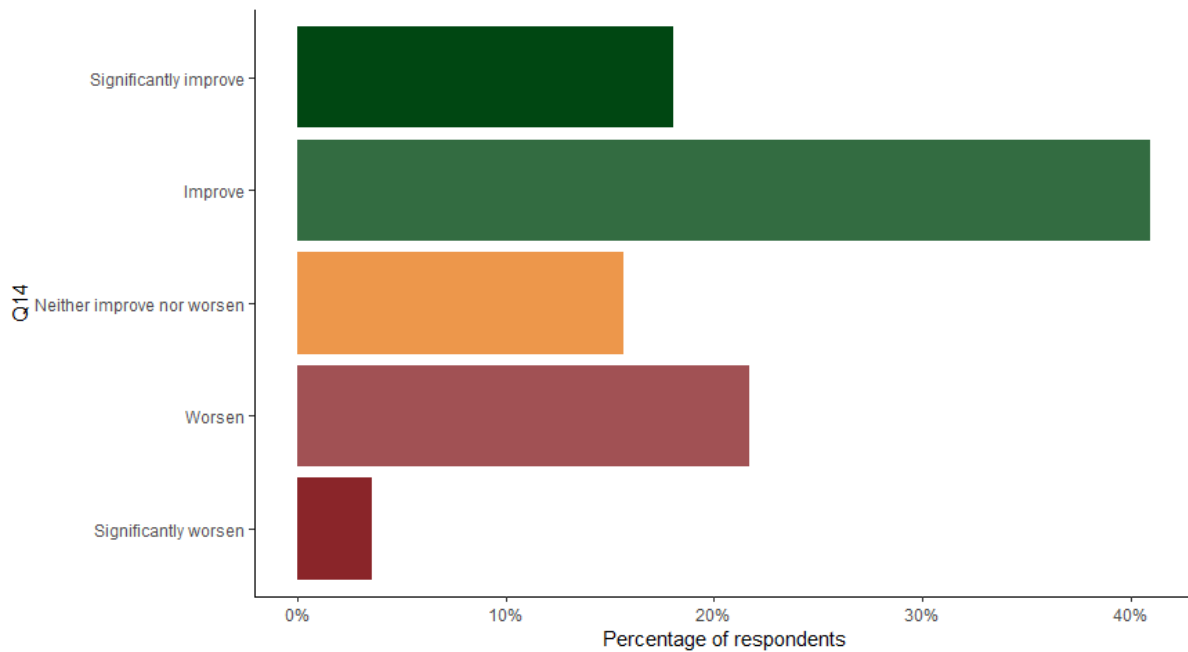
The outcomes of fitness to practise proceedings for registered residential child care staff in Scotland, Wales and Northern Ireland indicate that... professional registration can improve child protection arrangements, primarily by preventing unsuitable individuals from working in care roles with children. - *Independent organisation*

Q14. To what extent would professional registration improve or worsen issues of recruitment and retention of the children's homes workforce, over the longer term?

Eighty-three out of the 87 respondents answered this question. The majority (59%) stated that professional registration would improve (Improve / Significantly improve) recruitment / retention of the workforce, whilst 25% felt that it would worsen (Worsen

/ Significantly worsen), and 16% felt that it would neither improve nor worsen (see Figure 7).

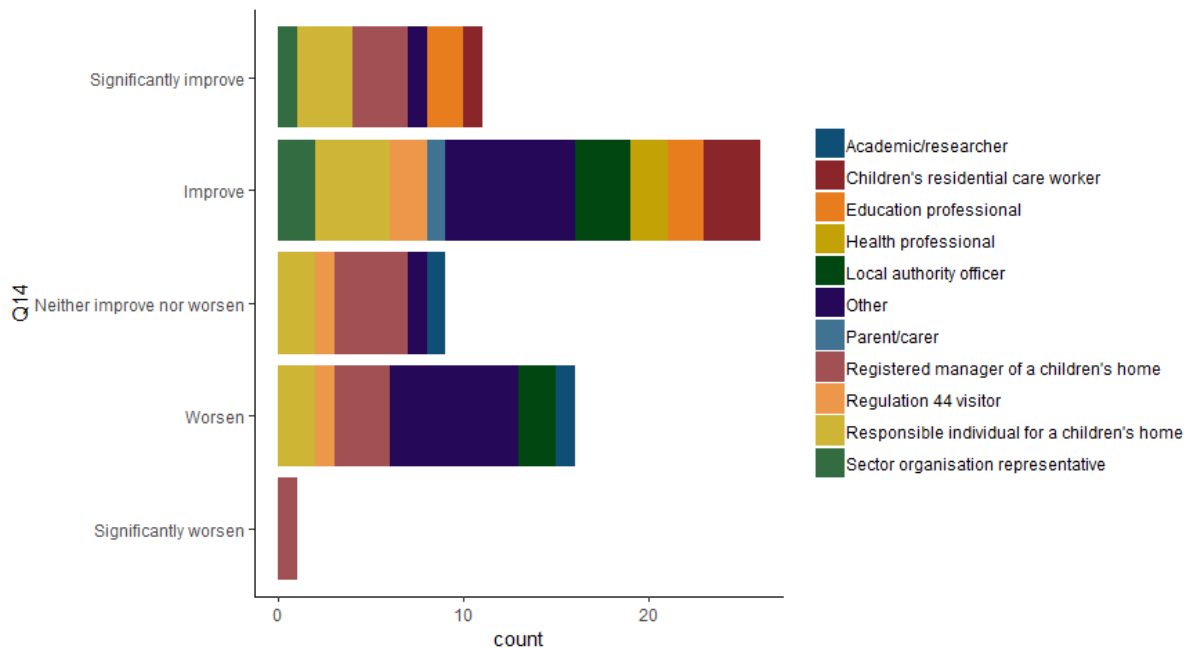
Figure 7: Responses to Q14



Base: All who responded to Q14 (n=83).

Analysis of responses to this question according to role of respondent revealed that all children’s residential care workers, education professionals and sector organisation representatives felt that recruitment / retention would improve with professional registration. There were no other clear trends (see Figure 8).

Figure 8: Responses to Q14 according to role



Base: All who responded to Q14 and provided details of their role (n=63).

Analysis of responses to this question according to organisation type revealed no clear trends.

Q15. What other ways are there of professionalising the children's homes' workforce to protect children, without establishing registration requirements?

There were 78 responses to this question. In describing the potential ways of professionalising the workforce to protect children, respondents commonly referred to 'train(ing)', 'qualification' 'professional', 'requirement', 'registration', 'development' and 'pay' (see Figure 35 in Appendix C).

Respondents suggested that salaries for the children's home workforce would need to be improved to reflect the demands of the role:

Any model must address the reality that the relatively low pay and status that accompany this role are equitable to employment options which demand fewer qualities and less commitment from a candidate. - *Voluntary and Community Sector organisation*

We would welcome increased pay for staff, which would acknowledge and recognise the hard work and commitment they show to their jobs. - *Children's home provider*

Analysis of the most common bigrams within the responses to Q15 (see Figure 36 in Appendix C) reiterates the suggestions of 'professional registration', 'professional qualification(s)', 'workforce development' and 'training requirement(s)' and also identifies comments relating to 'social worker(s)', 'safer recruitment' and 'local authority'.

Although the question asked for ways of professionalising the workforce other than registration requirements, approximately 20% of respondents maintained that professional registration would be the most effective method:

Professional regulation and registration will be a major step and key to success and a safe, high quality service. Anything less really will let down vulnerable children. - *Head of Operations, Children's home provider*

Some respondents identified that safer recruitment practices are needed, although it was also suggested that bad practice was the result of staff not having the right qualities, rather than a lack of safe recruitment:

Recruitment processes to be in line with safer recruitment principles and in line with local authority processes - even in the private sector. - *Regulation 44 Visitor*

Creating a requirement that enables previous employers to provide a full reference and share any concerns. - *Voluntary and Community Sector organisation*

Respondents recognised the need for improved training opportunities, with suggestions for a mandatory national training programme and more scrutiny of training providers. Respondents identified the need for professional qualifications in order to protect children:

Not a work based NVQ but a full-time professional qualification for residential staff... A recognised qualification and work-based placements should be afforded to anyone wanting to work in the care sector prior to them starting. - *Regulation 44 Visitor*

Ensuring that the mandatory qualifications... provides staff with the necessary skills and knowledge to safeguard children and that their competence in this regard is clearly evidenced. - *County Service Manager – Residential Care, Local Authority*

They also recognised the need for ongoing workforce development:

It is vital that a system of registration ensures that staff who are regularly working with vulnerable children have knowledge

enough to meet their potentially complex needs, and opportunities to develop specialisms and are supported in career development. - *Voluntary and Community Sector organisation*

Requiring a more robust approach to workforce development plans and encourage longer term approaches to staff training and development. - *Voluntary and Community Sector organisation*

Some respondents suggested that there should be more supervisory involvement from other professionals, including social workers, whilst it was also noted that social workers can be dismissive of Registered Managers:

Care staff and managers should be provided with more supervision and particularly from clinical staff who are registered in other professions such as Clinical Psychologists or Social Workers. - *Voluntary and Community Sector organisation*

To ensure outside bodies view managers as professionals... their voice needs to be heard more when making key decisions about a child. It is often the case that social workers... are dismissive of the manager and their in-depth knowledge of the children they care for. - *Associate Director, Children's home provider*

Finally, some respondents suggested that children's homes, and their staff, could be valued more highly by local authorities and used more effectively:

I think the issue is with the reputation of the children's homes service and therefore how it is perceived... homes are used as a 'last resort' by many local authorities rather than as part of a choice of placement from the start. - *Safeguarding Training Officer*

Single biggest thing - educate local authorities... about what residential care is, how specialist it is, how it is a continuum of models of delivery (not one thing) - raise its status....it is still being used inappropriately and as last resort. - *Responsible Individual for a children's home*

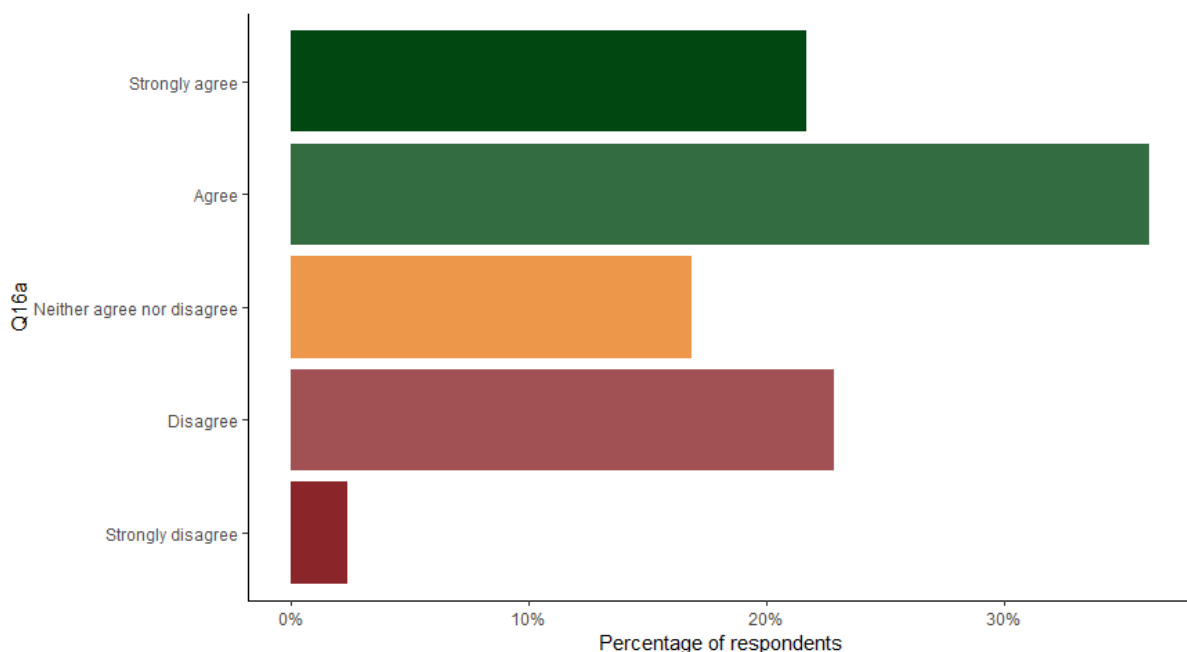
Approach to registering managers of children’s homes

The second section of the Call for Evidence covered the approach to registering managers of children’s homes, and comprised one closed primary question and one open supplementary question.

Q16a. To what extent do you agree that the current approach to registering managers is robust enough to protect children?

Eighty-three out of the 87 respondents answered this question. The majority (58%) agreed (Agree / Strongly agree), whilst 25% disagreed (Disagree / Strongly disagree), and 17% neither agreed / disagreed (see Figure 9).

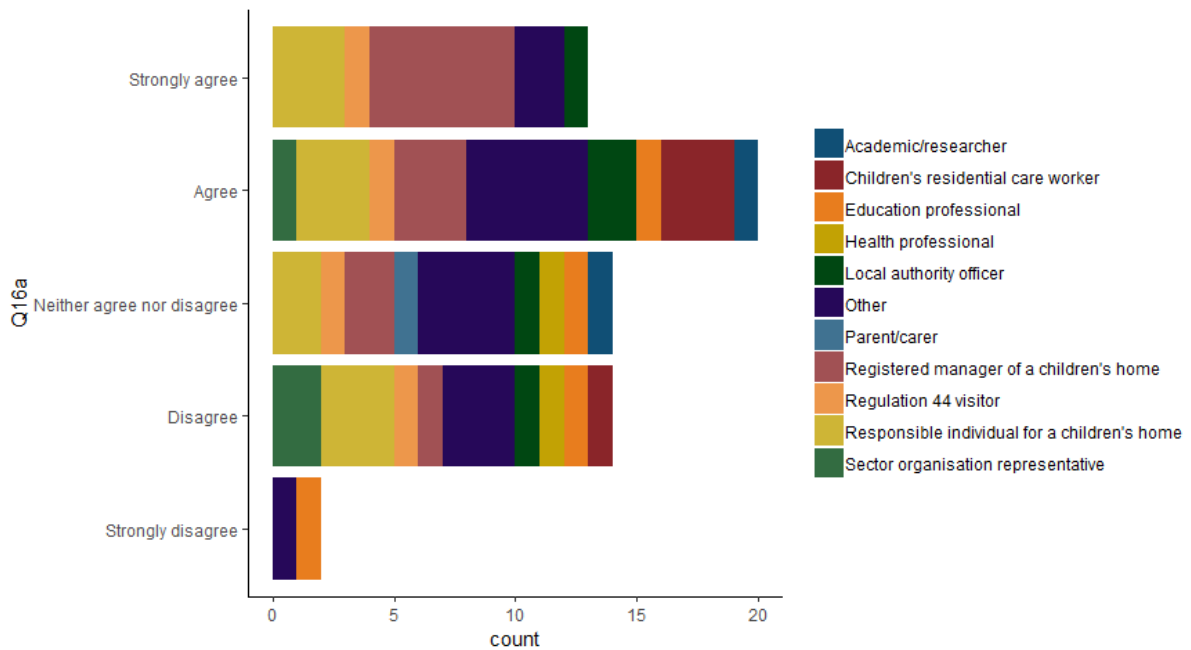
Figure 9: Responses to Q16a



Base: All who responded to Q16a (n=83).

Analysis of responses to this question according to role of respondent revealed that the vast majority of registered managers of children’s homes felt that the current approach to registering managers was robust enough. There were no clear trends for the other role groups (see Figure 10).

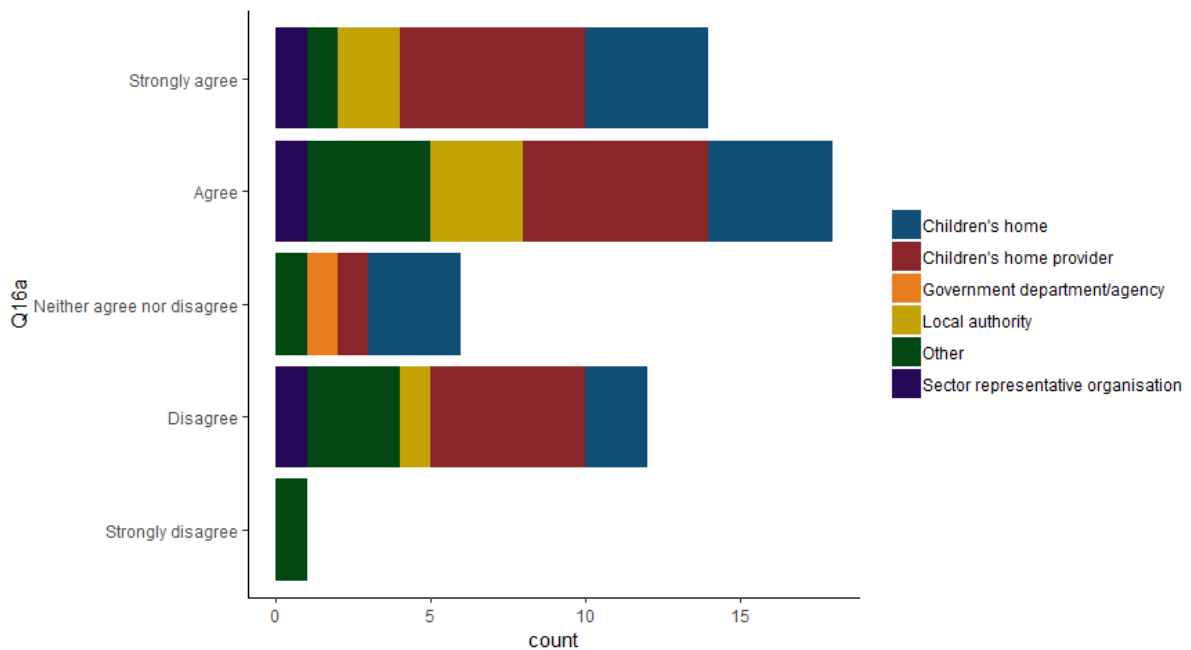
Figure 10: Responses to Q16a according to role



Base: All who responded to Q16a and provided details of their role (n=63).

Analysis of responses to this question according to organisation type revealed no clear trends, other than the majority of respondents from local authorities agreeing / strongly agreeing with the statement that the current approach to registering managers was robust enough (see Figure 11).

Figure 11: Responses to Q16a according to organisation type



Base: All who responded to Q16a and provided details of their organisation type (n=51).

Q16b. If you disagree, please explain why the current approach is not robust enough and how this could be improved

There were 26 responses to this question. Respondents commonly referred to 'Ofsted', 'interview' 'qualification/qualify' and 'time', (see Figure 37 in Appendix C).

Topic modelling analysis suggests that the two main themes within the responses to question 16b related to i) the issues with the current approach to registering managers, and ii) suggestions for improvement (see Figure 38 in Appendix C).

In relation to Topic 1 (Current issues), responses identified issues with the current approach involving Ofsted, particularly in relation to the time taken and the subjectivity of the fit person interview:

Ofsted's approach is often slow and subjective. It does not allow portability and at times does not deal with issues such as motivation. It is repetitive when a person moves from one home to another. - *CEO, Children's home provider*

The fit persons interview is only as good as the person conducting it, and I believe it's down to interpretation and difference depending on the inspector. - *Head of Operations, Children's home provider*

In relation to Topic 2 (Improvements), respondents referred to professional registration, a higher level of qualification (e.g. degree level) and development throughout Registered Managers' careers:

A professional body can provide both a 'disciplinary' process and a professional support that supports the RM in exercising their role. Adds to the professional development support for RM and identifies a career path. - *Sector organisation*

More assurance needs to be given that the appropriate levels of qualification and levels of child development and understanding are met. Should a homes' manager be social work qualified? I believe they should. - *Responsible Individual for a children's home*

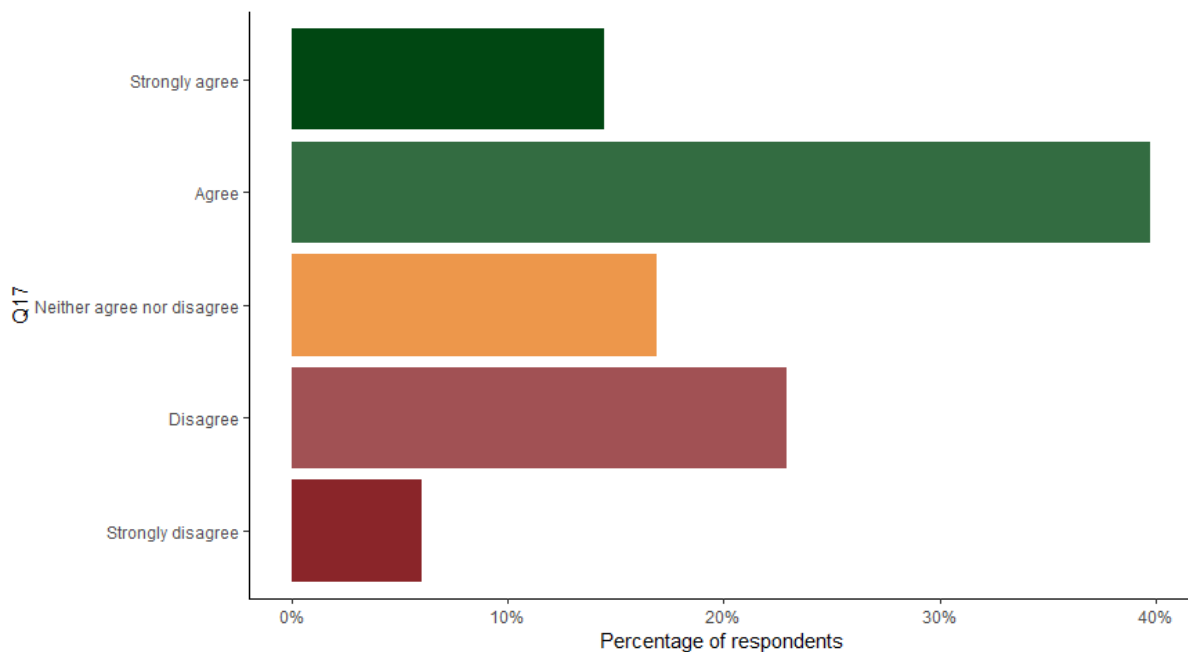
Qualifications and training

The third section of the Call for Evidence covered qualifications and training, and comprised three closed primary questions and one open supplementary question.

Q17. To what extent do you agree that the current mandatory qualifications are sufficient for registered managers?

Eighty-three out of the 87 respondents answered this question. The majority (54%) agreed (Agree / Strongly agree), whilst 29% disagreed (Disagree / Strongly disagree), and 17% neither agreed / disagreed (see Figure 12).

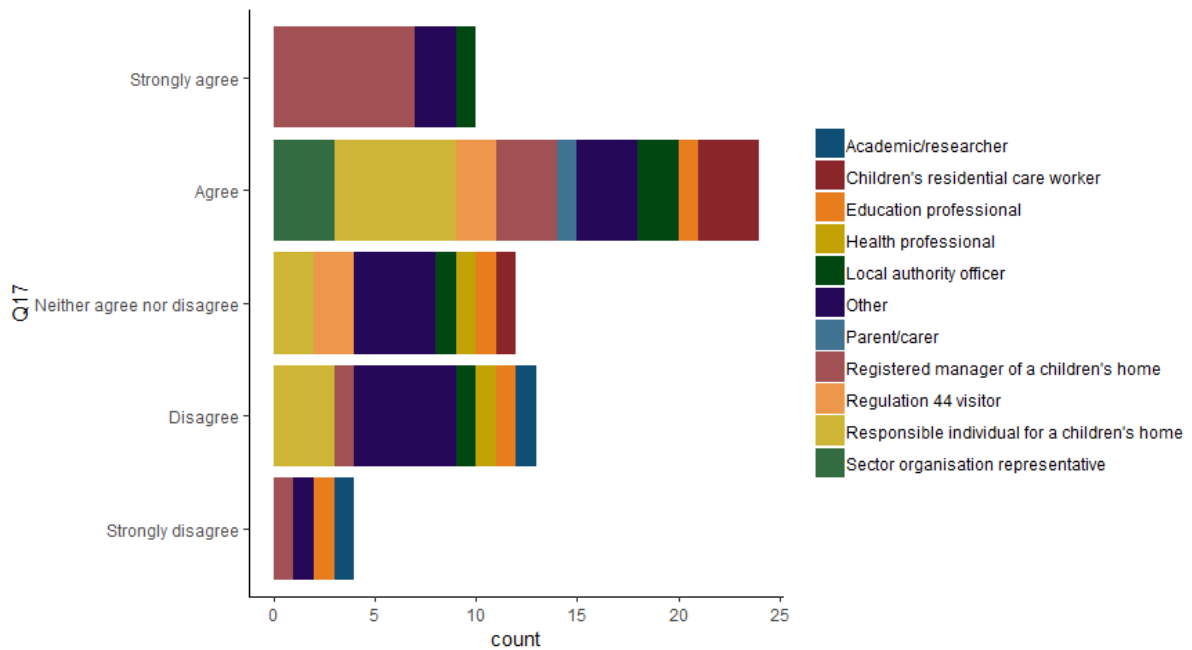
Figure 12: Responses to Q17



Base: All who responded to Q17 (n=83).

Analysis of responses to this question according to role of respondent revealed that the majority of registered managers of children's homes and sector organisation representatives felt that the current mandatory qualifications were sufficient for registered managers. There were no clear trends for the other role groups (see Figure 13).

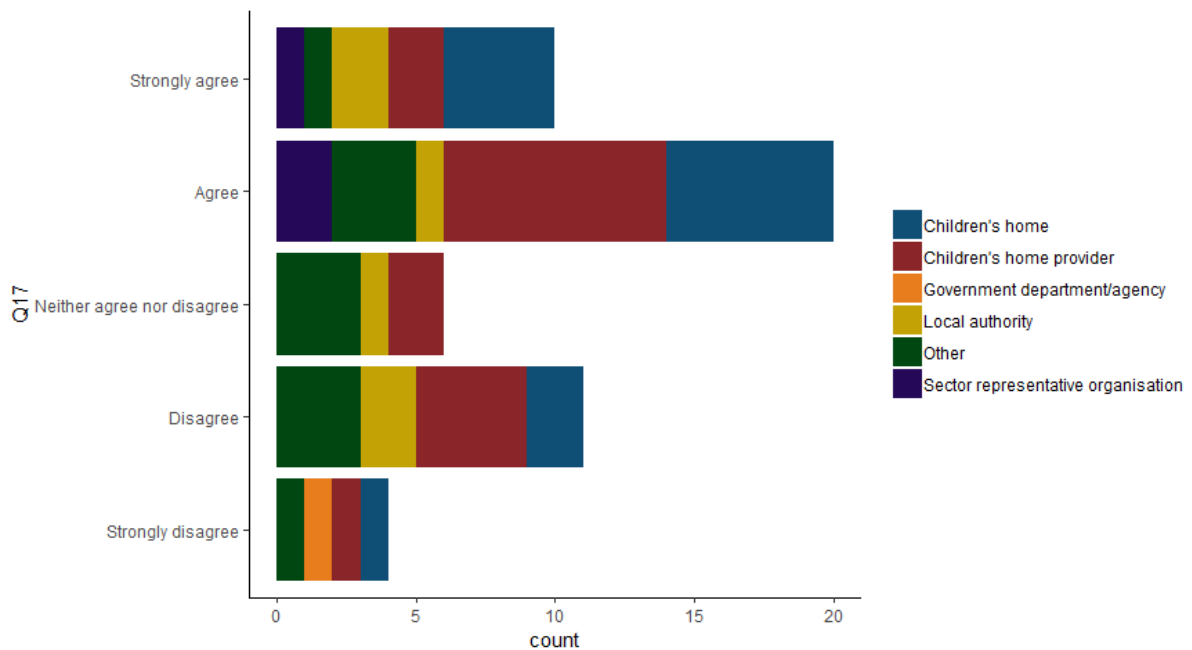
Figure 13: Responses to Q17 according to role



Base: All who responded to Q17 and provided details of their role (n=63).

Analysis of responses to this question according to organisation type revealed that the majority of respondents from children's homes and sector representative organisations felt that the current mandatory qualifications were sufficient for registered managers (see Figure 14).

Figure 14: Responses to Q17 according to organisation

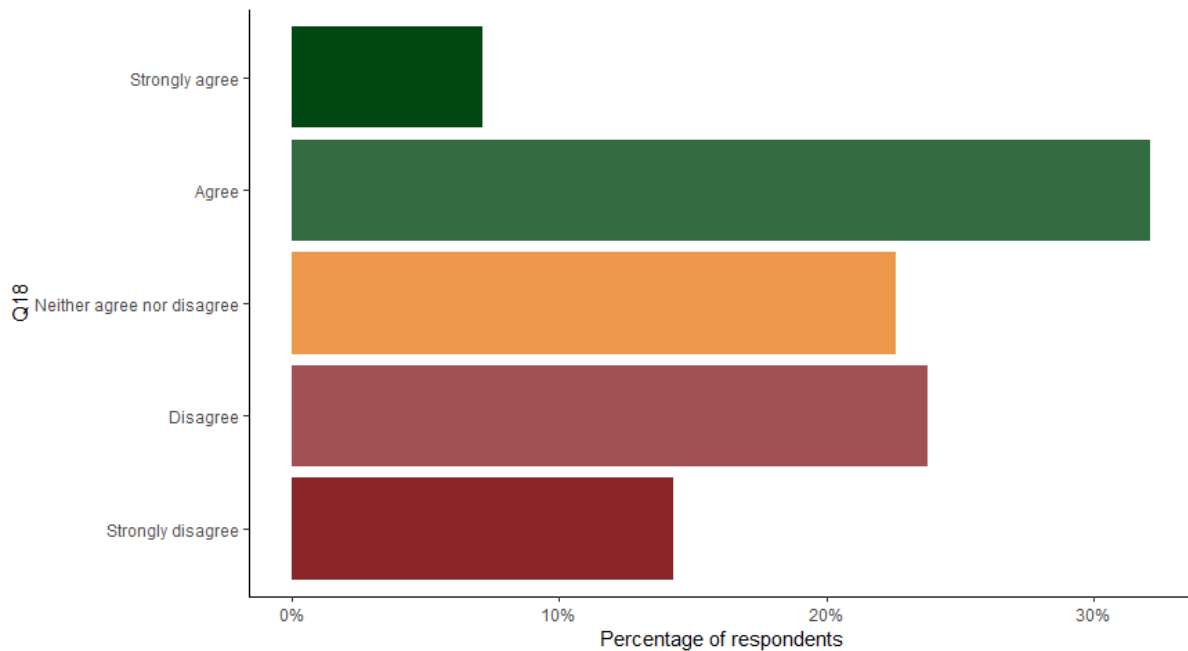


Base: All who responded to Q17 and provided details of their organisation type (n=51).

Q18. To what extent do you agree that the current mandatory qualifications are sufficient for people in care roles?

Eighty-four out of the 87 respondents answered this question. The responses were very mixed, with 39% agreeing (Agree / Strongly agree), 38% disagreeing (Disagree / Strongly disagree), and 23% neither agreeing / disagreeing (see Figure 15).

Figure 15: Responses to Q18



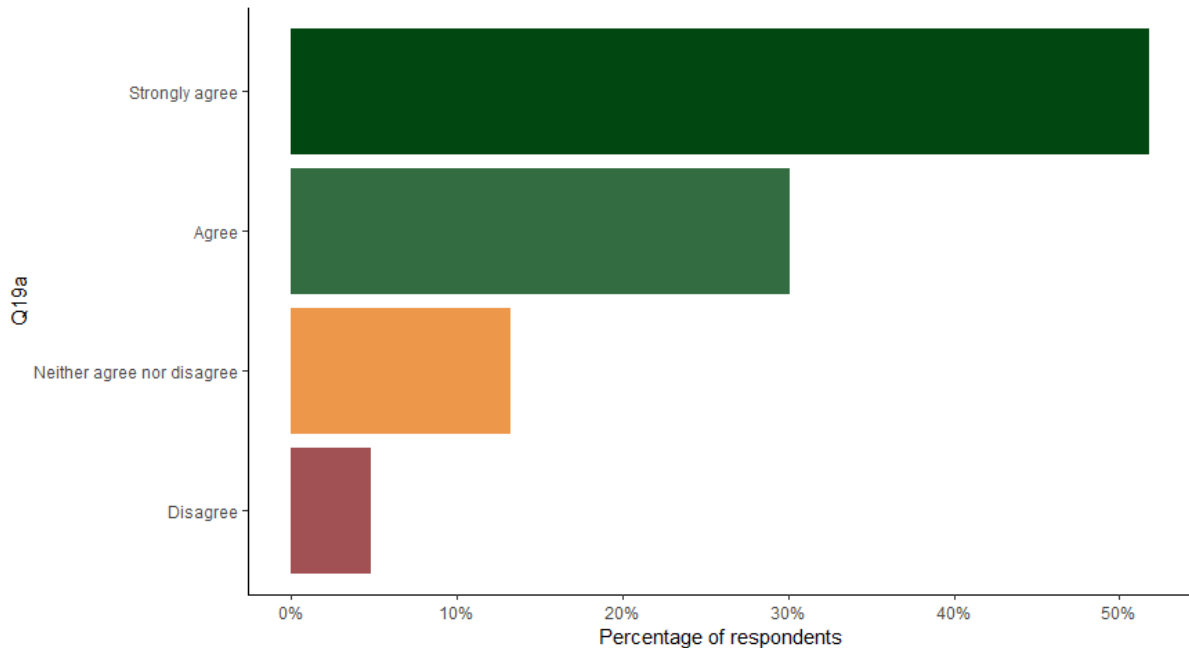
Base: All who responded to Q18 (n=84).

Analysis of responses to this question according to role of respondent and organisation type revealed no significant trends, so opinion did not seem to be related to these factors.

Q19a. To what extent do you agree that there should be other forms of training (for example T levels and apprenticeships) available to ensure staff are competent and deliver high quality care?

Eighty-three out of the 87 respondents answered this question. The vast majority (82%) agreed (Agree / Strongly agree) that there should be other forms of training available, whilst only 5% disagreed, and 13% neither agreed / disagreed (see Figure 16).

Figure 16: Responses to Q19a



Base: All who responded to Q19a (n=83).

As the vast majority of respondents agreed with the statement, analysis by respondent role / organisation type was not conducted.

Q19b. If you agree, what form should this training take?

There were 61 responses to this question. In describing the potential forms of training, respondents commonly referred to ‘apprenticeship’, ‘level 3’ ‘qualification’, ‘professional’, ‘development’ and ‘college’ (see Figure 39 in Appendix C).

Respondents identified that there needed to be a consistency in the basic qualification required, with some suggesting a foundation degree level, which can be built on with more specialist modules:

Specialised foundation degrees either specifically in ‘residential child care’, or ‘working with children and families’. - *Academic / researcher*

Foundation degree qualifications that can be built on in progressive levels (credits) and also allow for diverse specialism. - *Responsible Individual for a children’s home*

Respondents were generally positive towards the idea of apprenticeships, particularly with regard to widening and increasing recruitment. However, there were also caveats that the entry requirements would need to be appropriate for the role:

T levels and apprenticeships... could help encourage more people into these careers at an earlier stage and assist with providers' recruitment and retention challenges. - *Sector organisation*

It needs to be a low academic threshold, with experience of working with people... Social skills, being empathetic, understanding childhood trauma and its impact on behaviour are more important than quadratic equations for this role. - *Safeguarding Training Officer*

Respondents often cited the need for college / university involvement, either as the primary method of training, or to support an apprenticeship form of training:

A clear national curriculum / training programme that is college / university based as well as workplace assessment would improve the quality of training and standards in children's homes. - *Responsible Individual for a children's home*

Combination of apprenticeship, on the job training and some protected time away from the work place in a college or university. - *Registered Manager of a children's home*

Analysis of the most common bigrams within the responses to Q19b (see Figure 40 in Appendix C) reiterates the references to 'level 3' and 'continuing professional development', and also identifies comments relating to 'mandatory train(ing)'.

Respondents often stated that the Level 3 Diploma did not provide the most appropriate training and was not completed by a large section of the workforce:

There is a concern that the current qualifications do not provide the kind of learning that would suit care staff who may benefit from more practical training. - *Sector organisation*

Staff in care roles must begin training for an NVQ3 within six months of their employment, and complete the course within two years. However, there appears to be nothing stopping staff from moving between children's homes unqualified, in which case these deadlines then reset. - *Voluntary and Community Sector organisation*

Furthermore, respondents recognised that there were some additional areas that could be included in mandatory training:

There are a number of further areas which are not mandatory but should be in certain instances... for example An Introduction to Autism might be a requirement before you can work in a home for autistic children. - *CEO, Children's home provider*

An extension to the mandatory training to include child development, attachment and ACEs (Adverse Childhood Experiences). - *Responsible Individual for a children's home*

Finally, respondents noted that any initial training of children's home workers needs to be backed up by continuing professional development, in order to meet the needs of the children they care for:

Staff... should be offered the opportunity to continuously develop their skills, receiving extra training and learning opportunities to develop the care and support they provide to children and young people and meet specific complex needs. - *Sector organisation*

Each member of staff should have an individualised plan for training which supports them to develop the right knowledge and skills for the home in which they work and the children they care for; each home and individual is different, requiring a flexible, targeted and personalised approach to training. - *Voluntary and Community Sector organisation*

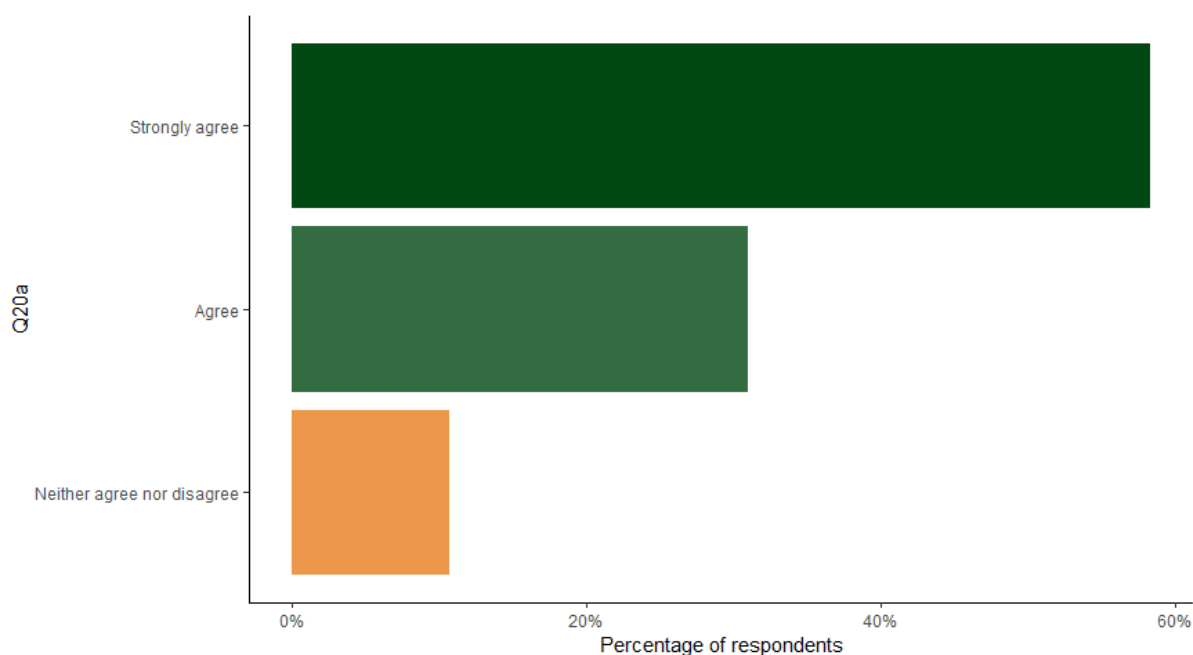
Professional standards

The fourth section of the Call for Evidence covered professional standards and comprised one closed primary question and one open supplementary question.

Q20a. To what extent do you agree that professional standards should be established for people in care roles in children's homes?

Eighty-four out of the 87 respondents answered this question. The vast majority (89%) agreed (Agree / Strongly agree) that professional standards should be established for people in care roles, whilst 11% neither agreed / disagreed (see Figure 17). No respondents disagreed with this statement.

Figure 17: Responses to Q20a



Base: All who responded to Q20a (n=84).

As the vast majority of respondents agreed with the statement, analysis by respondent role / organisation type was not conducted.

Q20b. If you agree, what should these professional standards cover?

There were 66 responses to this question. In suggesting areas that the professional standards could cover, respondents commonly referred to 'safeguard', 'child'

'development', 'conduct', 'train(ing)', 'practice', 'social', 'communication' and 'behaviour' (see Figure 41 in Appendix C).

Analysis of the most common bigrams within the responses to Q20b (see Figure 42 in Appendix C) reiterates the references to 'professional development', 'social worker' and 'child development', and also identifies comments relating to 'quality standard', 'whistle blow', 'mental health' and 'child protection'.

Many respondents provided lists of areas that should be included in the professional standards, rather than giving full text responses. These suggestions commonly included continuing professional development, child protection and safeguarding, child development, professional conduct, training, communication, behaviour management, whistle blowing and mental health awareness.

Several respondents suggested that the professional standards should be the...

Same or similar to those required by children's social workers. -
Registered Manager of a children's home

Whilst some respondents proposed that they should be...

In line with the Quality Standards. - Assistant Manager of a
children's home

Or were already covered by these:

If everyone embraced the children's homes quality standards in the spirit in which they are written that would make an improvement in practice... The theory has been written, the challenge is to put the theory into practice. - *Director, Children's home provider*

Unregulated provision

The Department is carrying out a separate piece of work to develop understanding of the reasons for local authorities placing children in unregulated provision in increasing numbers, and the quality of this provision. Through this Call for Evidence, the Department sought the view of the sector on whether there are issues related to the workforce that are specific to unregulated settings. These are settings that are not registered with Ofsted under the Care Standards Act (2000), as they do not deliver both care and accommodation in a setting that is fixed or of a permanent nature.

The final section of the Call for Evidence, therefore, considered unregulated provision, and comprised just one open question.

Q21. Are there further workforce concerns associated with the use of unregulated provision?

There were 68 responses to this question. Respondents commonly referred to 'regulate', 'vulnerable' 'standard(s)', 'safeguard', 'quality', 'practice', 'experience', 'authority', '16' and '18' (see Figure 43 in Appendix C).

Topic modelling analysis suggests that there were five main themes within the responses to question 21, which related to: i) lack of checks on the quality of provision; ii) the vulnerable age group (16-18) primarily being accommodated in this provision; iii) the need to regulate this provision due to concerns with such placements; iv) issues with the standard of safeguarding; and v) a lack of trained staff in this sector (see Figure 44 in Appendix C).

In relation to Topic 1 (Lack of checks), responses noted that the use of unregulated provision had risen, but there were no checks being carried out on the quality of care and support being provided to children / young people within this sector:

I don't believe this [unregulated provision] should exist as there is no accurate measure of quality of care. Whilst the homes I have visited which are unregulated have welcomed me in to complete a similar audit to reg 44, there are those who may have no external governance. - *Regulation 44 Visitor*

Unregulated provisions are not subject to the same checks but are still responsible for delivering care to children. Recruitment checks are not to the same level, care provided is not monitored and neither is safety of the provision or safeguarding of children. - *Professional working in safeguarding*

In relation to Topic 2 (Vulnerable age), respondents identified that the majority of those being accommodated within unregulated services were within the 16-18 age group, extremely vulnerable and not ready for the level of independence within these settings:

Young people placed in these services are... nowhere near ready for independence due to their complex needs. They often need the same level of support and care that they would receive in a children's home or foster placement. - *Children's home provider*

They are the same children and their needs are unlikely to have changed on their 16th birthday so the expectation should be the same as the expectation for those working in a registered children's home until at least age 18 and frequently beyond... By definition they are vulnerable. - *Sector organisation*

In relation to Topic 3 (Need to regulate), respondents were concerned about the placement of young people in unregulated provision and there was strong support for such settings to be regulated:

This sector is growing as the costs of regulated provision increases... I am of the view that this sector should be regulated by either Ofsted or, for over 18s, Care Quality Commission (CQC). - *Responsible Individual for a children's home*

I am amazed that some 16 plus homes are not regulated when they need to give the most support to care leavers. This definitely needs regulating. - *Education Professional*

In relation to Topic 4 (Safeguarding standards), respondents were concerned with the lower standard of safeguarding within unregulated provision, leading to unsafe services for the children and young people in their care:

There is a fine line between unregulated and unregistered provision with unregulated tipping over into unregistered which has implications for the future placements for children and the quality of safeguarding in place. - *County Service Manager – Residential Care, Local Authority*

So many unscrupulous providers are setting up and continuing to damage young people's lives through their unsafe and unregulated activity... the risk they present is huge and it is only

a matter of time until something serious happens. - *CEO, Children's home provider*

In relation to Topic 5 (Lack of trained staff), respondents were concerned about the use of untrained bank / agency staff practicing care roles within the unregulated sector:

There are no requirements around staff working in unregulated settings... a lot of staff employed in these settings are temporary bank and agency and their training sometimes leaves a lot to be desired. - *Commissioning Manager, Local Authority*

The workforce is not experienced, specialised or often even interested in the young people living in the services, so are not likely to be keeping young people safe or sufficiently helping them on their journey to independence. - *Children's home provider*

Findings from the literature review

The recent literature review commissioned by DfE (conducted by the RTK, 2019) reported that, in 2015, 76% of managers held the Level 5 Diploma in Leadership and Management for Residential Childcare (with a further 14% working towards it), and 80% of other staff held a Level 3 Diploma for Residential Childcare (with a further 12% working towards it) and that 82% of children's homes in England were rated good or outstanding by Ofsted. However, the responses to the Call for Evidence suggested that there were concerns regarding the significant minority of staff that had not met the mandatory qualification requirement. Although there are different reasons why a worker may have failed to gain the qualification in the required timescale, if the worker has failed on capability grounds there is the theoretical potential that these individuals are able to freely move to other children's homes, where the timescale for completing the qualification resets. Furthermore, the response from Ofsted suggested that there had been a more recent decline in the number of staff achieving the Level 3 Diploma.

Evidence from the literature review suggested that professional registration, on its own, can be primarily about restricting poor quality providers rather than improving workforce or practice quality standards and providers recommended any regulation be supported by investment in training. Furthermore, international evidence from the literature review suggested that a learning-based and collaborative approach to regulation that prioritises capacity-building of professional skills, rather than compliance, was worth considering as a means to improving standards of practice. These findings were partially reflected in the responses to the Call for Evidence. Although views were very mixed as to whether the existing regulatory arrangements were robust enough to protect children, those who thought that they were not suggested that improvements were required in training / qualifications and professional development. In terms of other ways of professionalising the children's homes' workforce to protect children, suggestions, again, included improved training, qualifications and continuing professional development. Nevertheless, approximately a fifth of respondents suggested that professional registration remained the most effective way to protect children. The literature review also found evidence suggesting that where provision is largely provided by the private sector, as is the case for children's homes in England, registration either of the workforce or the setting enables the state to exert only a limited influence over the composition and development of the care market. This question was not specifically asked within the Call for Evidence, and it wasn't an issue that was mentioned by respondents.

The literature review found that 54% of managers found it difficult to recruit staff with the appropriate level of skills and training, but there was not enough robust evidence to provide a definitive answer to the question concerning the impact of registration on recruitment and retention. The majority of respondents to the Call for Evidence felt that professional registration would improve recruitment / retention of the workforce, whilst a quarter felt that it would worsen. Indeed, issues with recruitment and the retention of experienced staff were noted as potential drawbacks of establishing

professional registration for people in care roles. So, the findings here were not entirely clear.

The evidence from the literature review suggested that additional qualification requirements may not be effective unless they are part of more systemic changes, with continuing support for staff being critical. Within the Call for Evidence most respondents agreed that the current mandatory qualifications were sufficient for registered managers, but for people in care roles the views were rather mixed. However, respondents generally felt that training should be supported by an enhanced level of CPD, which fits with the finding from the literature review. The literature review also recommended further areas for systemic changes, including strengths-based approaches, multi-disciplinary working, use of key workers, reflective practice, and use of short-stay residential provision. Again, this was not specifically covered within the Call for Evidence, but (with the exception of some respondents suggesting more involvement from other professionals, particularly social workers), these areas were not mentioned by respondents.

Finally, the literature review suggested that the introduction of professional standards was more likely to improve the quality of provision where providers are supported to implement a system of organisational processes and procedures that will promote compliance. Respondents to the Call for Evidence, overwhelmingly agreed that professional standards should be established for people in care roles in children's homes.

Conclusions

There was no consensus in the responses to the Call for Evidence on whether the existing regulatory arrangements were robust enough to protect children or whether the current mandatory qualifications were sufficient for people in care roles.

Other responses were rather more conclusive, with the majority of respondents suggesting that professional registration would improve recruitment / retention of the workforce, that the current approach to registering managers was robust enough to protect children, and that the current mandatory qualifications were sufficient for registered managers.

There was a consensus that there should be other forms of training available to ensure that staff are competent and deliver high quality care, and a consensus that professional standards should be established for people in care roles in children's homes.

It was viewed that establishing professional registration requirements would increase professionalisation and public confidence, enhance child protection and bring England in line with the devolved administrations, but that this would have cost implications and increased training requirements, which would need to be reflected in better pay, terms and conditions.

Some major themes were evident in the responses to several questions, including suggestions of improved recruitment practices, and enhanced training, qualifications and continuing professional development for the children's home workforce, whether or not professional registration were to be introduced. It was suggested that professional standards should cover CPD, child protection and safeguarding, child development, professional conduct, training, communication, behaviour management, whistle blowing and mental health.

There were several strong concerns raised regarding the use of unregulated provision, including the lack of checks, the vulnerable age group accommodated in such settings, a lower level of safeguarding and a lack of trained staff. It was generally viewed that these settings should become regulated.

The recent literature review (RTK, 2019), commissioned by DfE, supports the above finding that consideration should be given to enhancing the opportunities for training and continuing professional development for the children's homes workforce. The evidence from the literature review suggested that any regulation should be supported by investment in training, that capacity-building of professional skills be prioritised to improve standards, and that additional qualification requirements alone may not be effective unless they are part of more systemic changes, with continuing support for staff being critical.

However, there are some limitations to the conclusions that can be drawn from the Call for Evidence. The number of respondents was rather lower than expected, which may lower the representativeness of the results. Furthermore, although the proportions of respondents from different organisational types are reflective of the sector overall, a large proportion of respondents were Registered Managers or

Responsible Individuals for children's homes, and so it would be useful to seek further views from local authorities as commissioners of these services.

Further considerations

To establish a firm understanding of the issues highlighted from the Call for Evidence, and how to address these, the following topics should be explored further:

- **Training / qualification issues** (numbers achieving qualifications, provision and consistency of training, consequences of not qualifying within the specified time period, potential for apprenticeships / other non-academic routes)
- **Professional development** (current levels of CPD, barriers to engagement, potential changes)
- **Financial implications of professional registration** (economic impact, comparisons of salary in other care roles with professional registration)
- **Professional standards** (appropriate regulatory body, monitoring, involvement of sector bodies and providers)
- **Unregulated provision** (usage, underlying reason for placements, quality of care, level of staff training, safeguarding issues, potential changes).

Appendix A: Call for Evidence questions

1. What is your name?
2. What is your email address?
3. Are you happy to be contacted directly about your response?
 - Yes
 - No
4. Are you responding as an individual, or as part of an organisation?
 - Individual
 - Organisation
5. If you are responding as an individual, how would you describe yourself?
 - Registered manager of a children's home
 - Children's residential care worker
 - Responsible individual for a children's home
 - Local authority officer
 - Local authority councillor
 - Parent/carer
 - Child/young person
 - Regulation 44 visitor
 - Health professional
 - Educational professional
 - Sector organisation representative
 - Academic/researcher
 - Other
- 5b. If you selected 'other', please tell us in what capacity you are responding to this call for evidence.
6. If you are responding as part of an organisation, what type of organisation is this?
 - Children's home
 - Children's home provider
 - Local authority
 - Sector representative organisation
 - Government department/agency
 - Other
- 6b. If you selected 'other', please explain what type of organisation you are responding on behalf of.
7. If applicable, what is the name of your organisation?
8. What is your role?
9. Would you like us to keep your responses confidential?

- Yes
- No

10a. To what extent do you agree or disagree that the existing regulatory arrangements for the children's homes' workforce are robust enough to protect children?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

10b. If you disagree, what are the main areas where improvements in workforce regulation need to be made?

11. What do you think are the potential benefits of establishing professional registration requirements for:

- a) Registered managers?
- b) People in care roles?

12. What do you think are the potential drawbacks of establishing professional registration requirements for:

- a) Registered managers?
- b) People in care roles?

13. How would the introduction of professional registration impact on child safeguarding?

14. To what extent would professional registration improve or worsen issues of recruitment and retention of the children's homes workforce, over the longer term?

- Significantly improve
- Improve
- Neither improve nor worsen
- Worsen
- Significantly worsen

15. What other ways are there of professionalising the children's homes' workforce to protect children, without establishing registration requirements?

16a. To what extent do you agree that the current approach to registering managers is robust enough to protect children?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree

- Strongly disagree

16b. If you disagree, please explain why the current approach is not robust enough and how this could be improved.

17. To what extent do you agree that the current mandatory qualifications are sufficient for registered managers?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

18. To what extent do you agree that the current mandatory qualifications are sufficient for people in care roles?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

19a. To what extent do you agree that there should be other forms of training (for example T levels and apprenticeships) available to ensure staff are competent and deliver high quality care?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

19b. If you agree, what form should this training take?

20a. To what extent do you agree that professional standards should be established for people in care roles in children's homes?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

20b. If you agree, what should these professional standards cover?

21. Are there further workforce concerns associated with the use of unregulated provision?

Appendix B: Text analytics methods

Software

The text analysis was carried out using the open source programming language and statistical computing environment R. There are multiple packages available within R that allow the performing of text mining tasks. The approach taken here is the one outlined in Silge and Robinson (2017) in 'Text Mining with R'.

Processing of text data

Unless stated otherwise, the data were systematically 'lemmatised' (i.e. the inflectional forms of a word were grouped together). For example, after lemmatising the words 'child' and 'children' were pooled together. Stop words (i.e. commonly used words such as 'and', 'the' and 'it') were also systematically removed, as well as punctuation.

Word/bigram frequencies

Some respondents used the same word on multiple occasions in the same answer. This had the potential to bias word frequencies by inflating counts for a particular word. To limit this phenomenon, the frequencies given in the results were expressed as a percentage of respondents mentioning a given word at least once.

Bigram networks

Bigram networks are visual representations of all word relationships across a set of answers. Lines link pairs of words, from the node (the first word in a pair) to the edge (the second word). The width of the lines quantify the weight of the relationship or how often one node is associated to its edge. The networks make use of the true word frequencies (i.e. if a word is mentioned several times by the same respondent they will be taken into account).

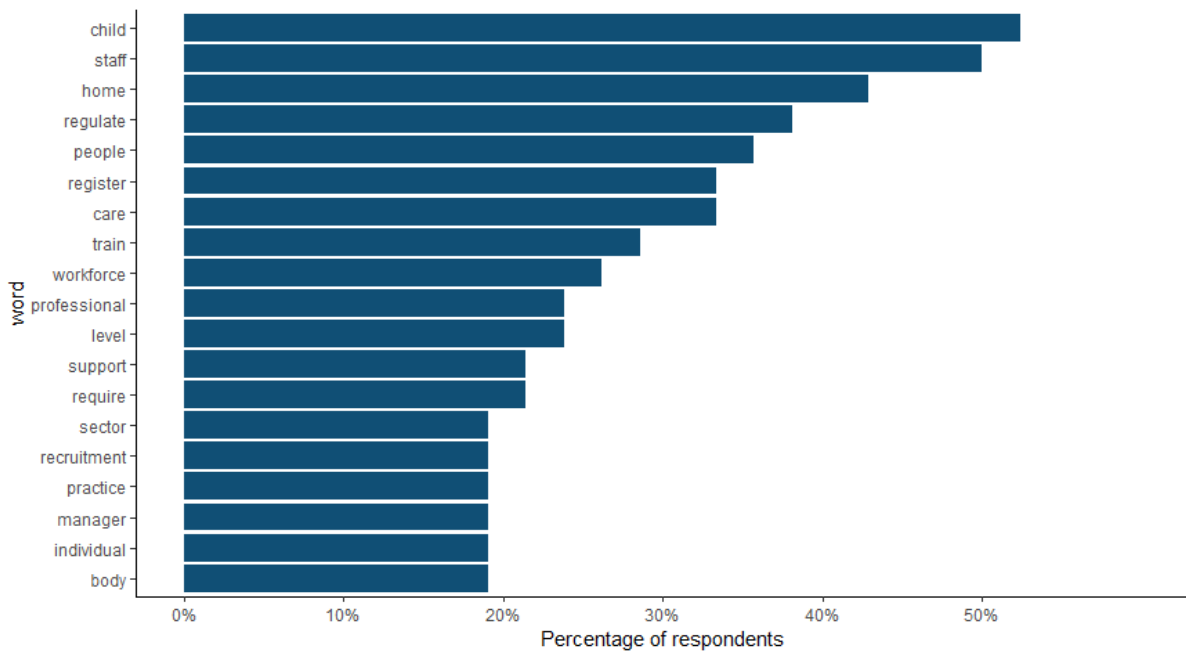
Topic modelling

Topic modelling is a way of classifying text documents. In this analysis it is performed using a technique called Latent Dirichlet Allocation (LDA). LDA assumes that each document is a mixture of several topics and that in turn each topic is a mixture of words. Outputs show top words in each topic and the mixture of topics in the responses to a given question.

Appendix C: Text analytics

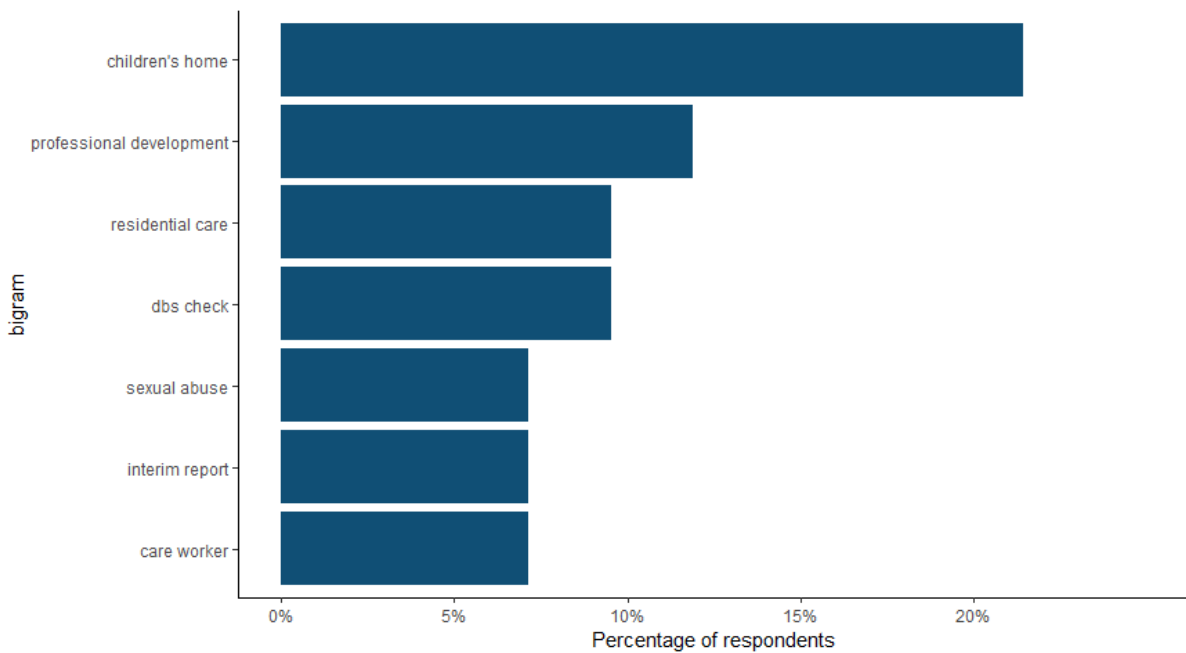
Q10b. If you disagree, what are the main areas where improvements in workforce regulation need to be made?

Figure 18: Top 19 words used by respondents to Q10b



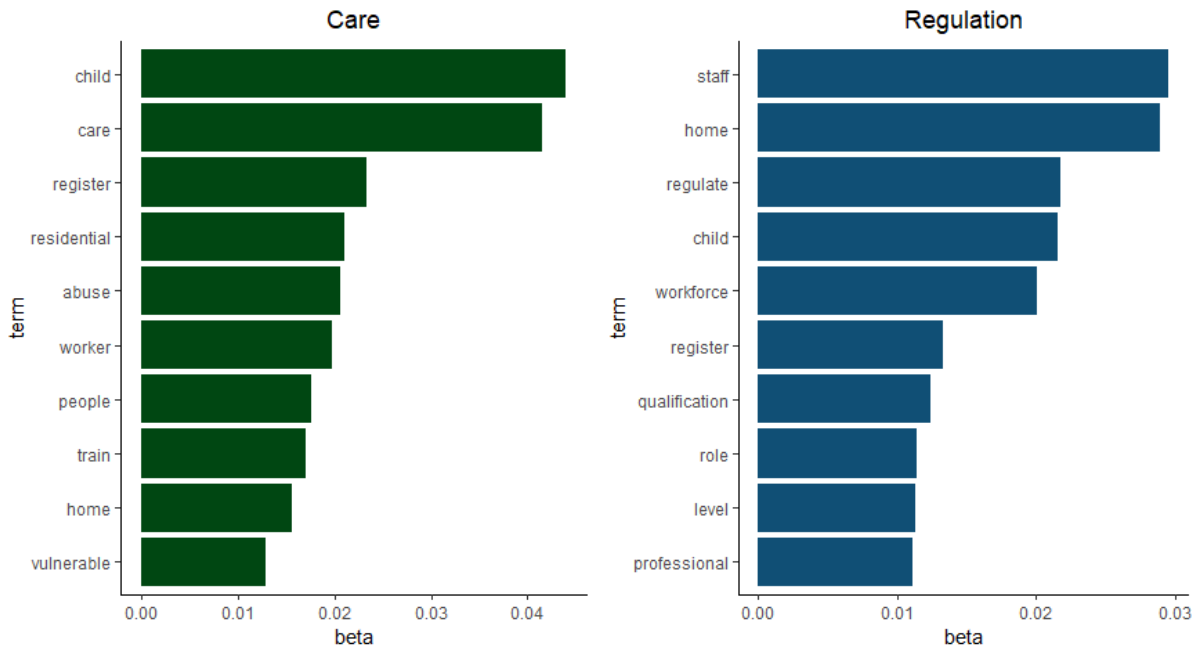
Base: All who responded to Q10b (n=42).

Figure 19: Top 7 bigrams used by respondents to Q10b



Base: All who responded to Q10b (n=42).

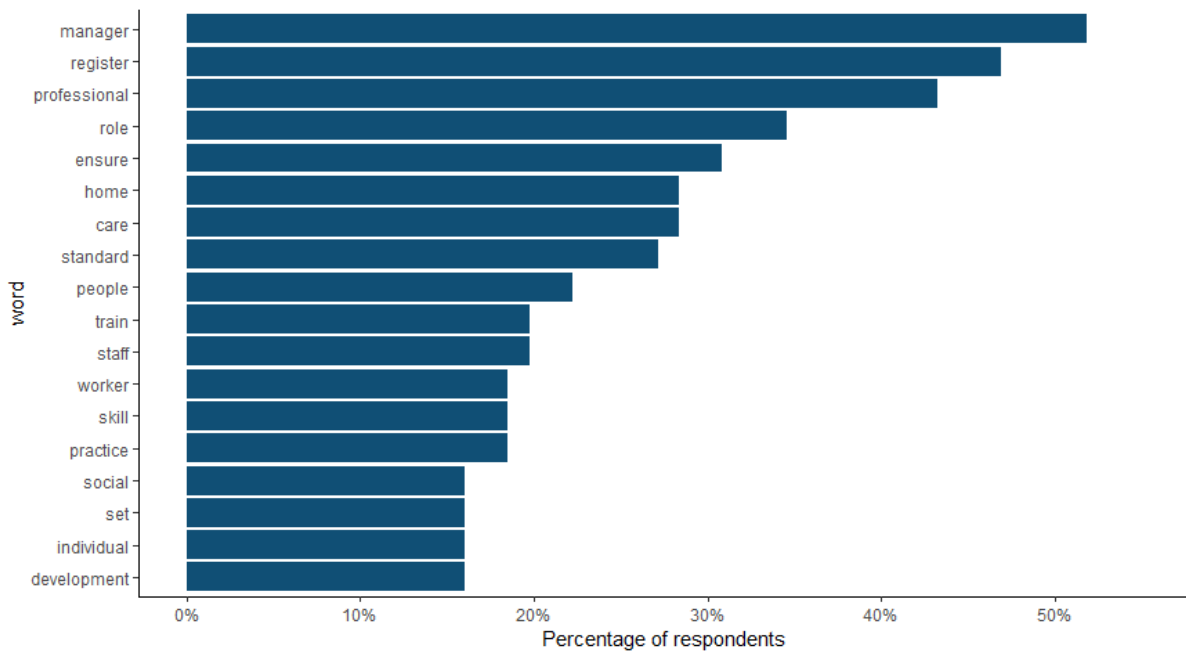
Figure 20: Top 10 words in the topics identified in responses to Q10b



Base: All who responded to Q10b (n=42).

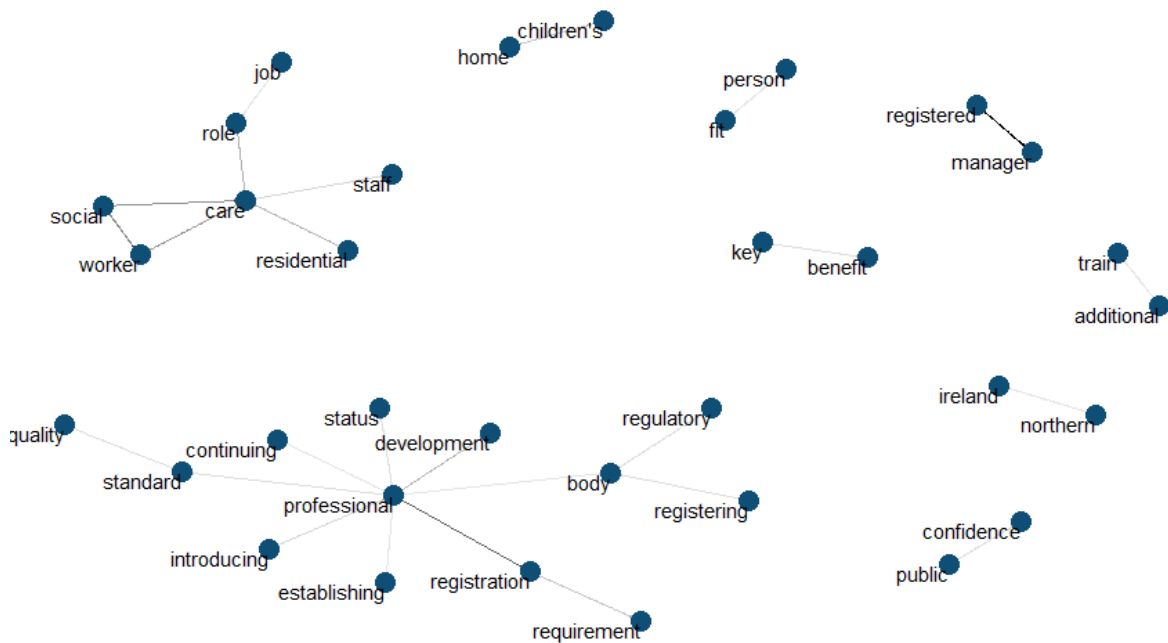
Q11a. What do you think are the potential benefits of establishing professional registration requirements for registered managers?

Figure 21: Top 18 words used by respondents to Q11a



Base: All who responded to Q11a (n=81).

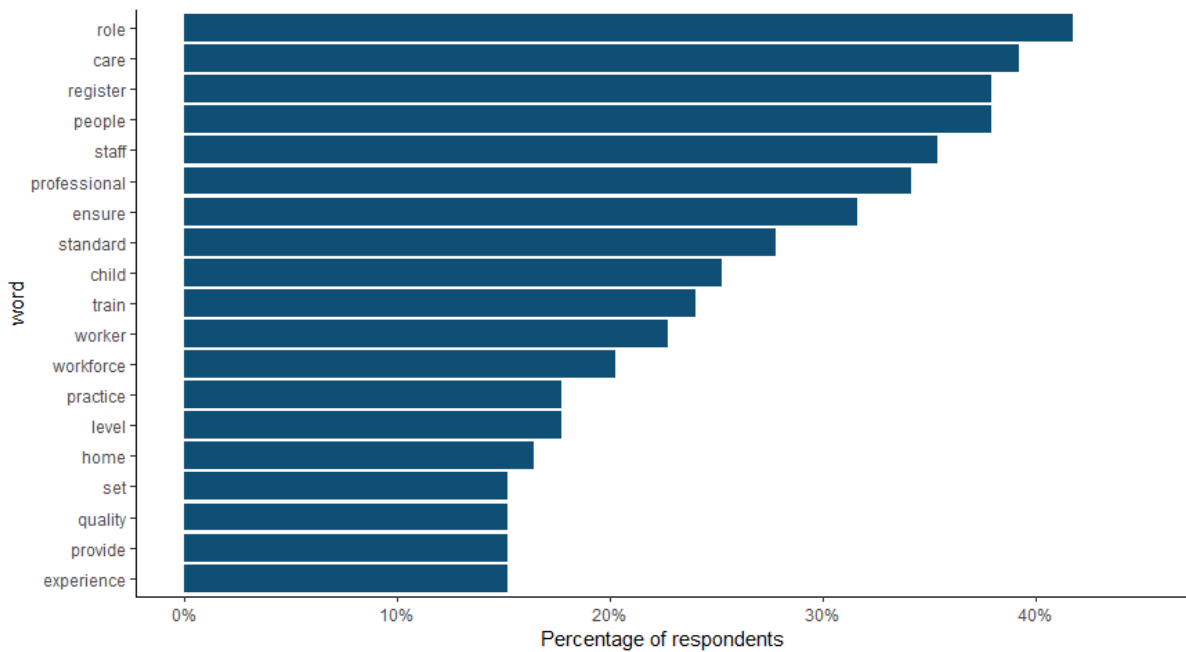
Figure 22: Network of most frequent bigrams in responses to Q11a



Base: All who responded to Q11a (n=81). Bigram networks are visual representations of all word relationships across a set of answers. Lines link pairs of words, with the width of the line quantifying the weight of the relationship or how often one word is associated with the other.

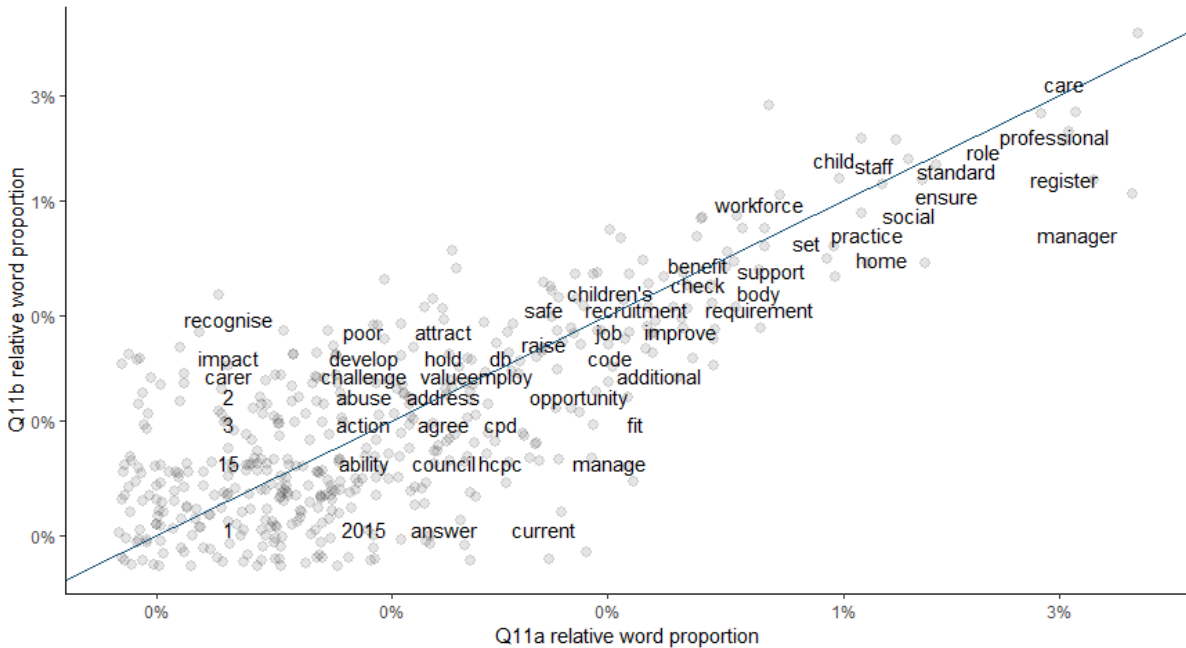
Q11b. What do you think are the potential benefits of establishing professional registration requirements for people in care roles?

Figure 23: Top 19 words used by respondents to Q11b



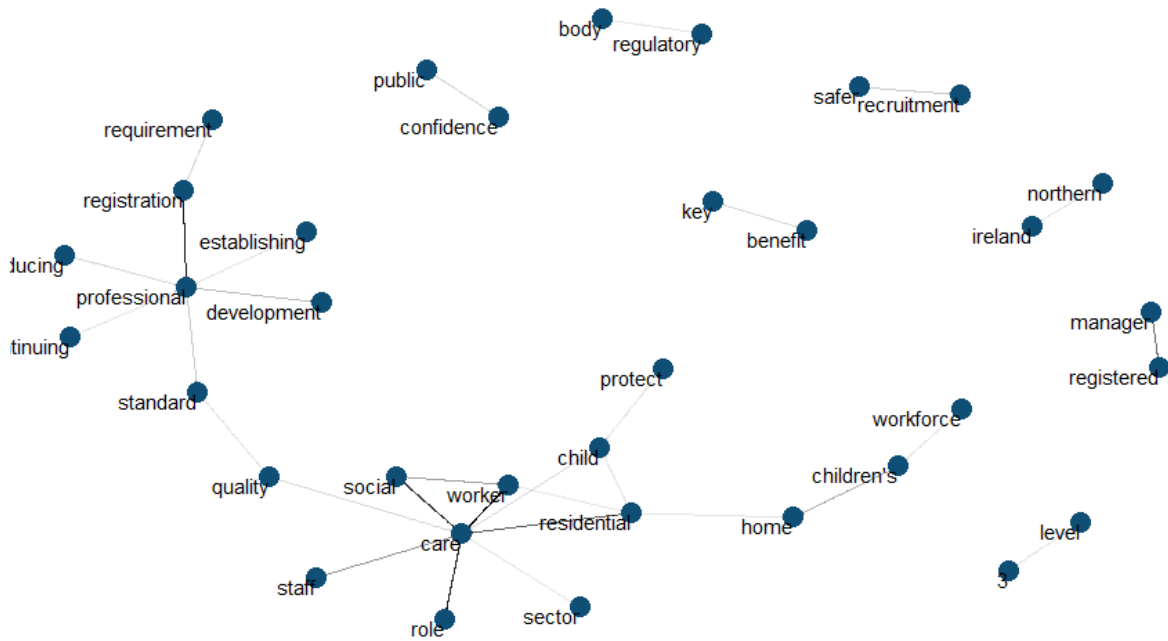
Base: All who responded to Q11b (n=79).

Figure 24: Commonality of word proportions in responses to Q11a and Q11b



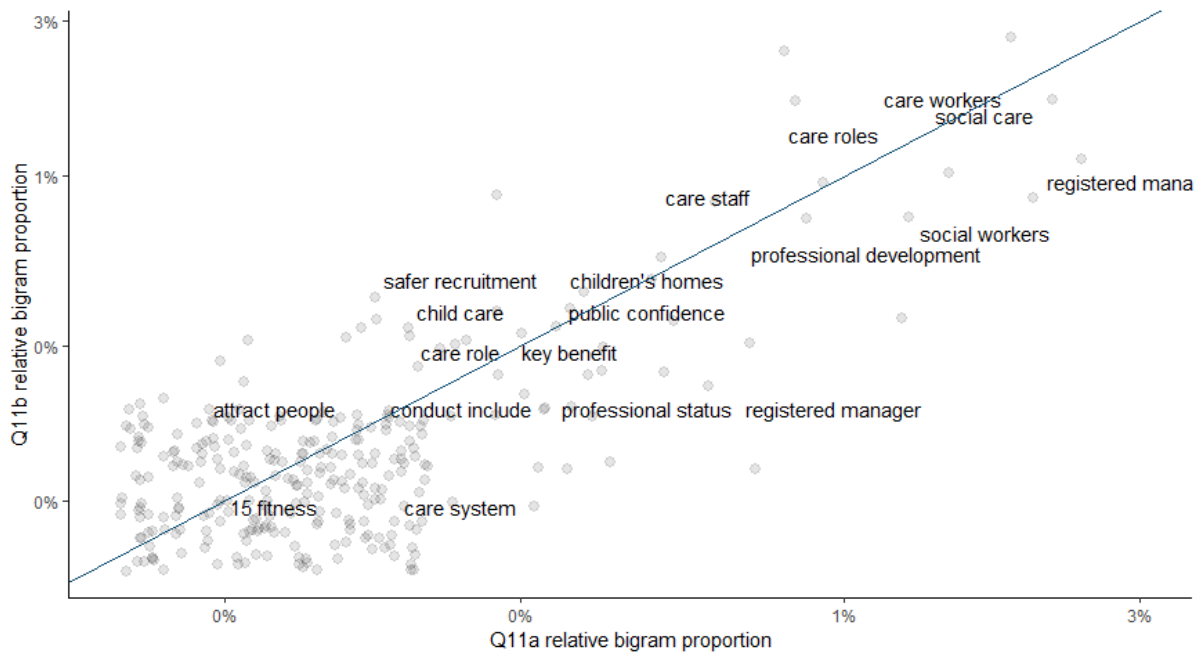
Base: All who responded to both Q11a and Q11b (n=71). Words close to the blue line have similar frequencies in both sets of responses; words below the line are more frequent in responses to Q11a, and words above the line are more frequent in responses to Q11b. Pearson product-moment correlation = 0.88.

Figure 25: Network of most frequent bigrams in responses to Q11b



Base: All who responded to Q11b (n=79). Bigram networks are visual representations of all word relationships across a set of answers. Lines link pairs of words, with the width of the line quantifying the weight of the relationship or how often one word is associated with the other.

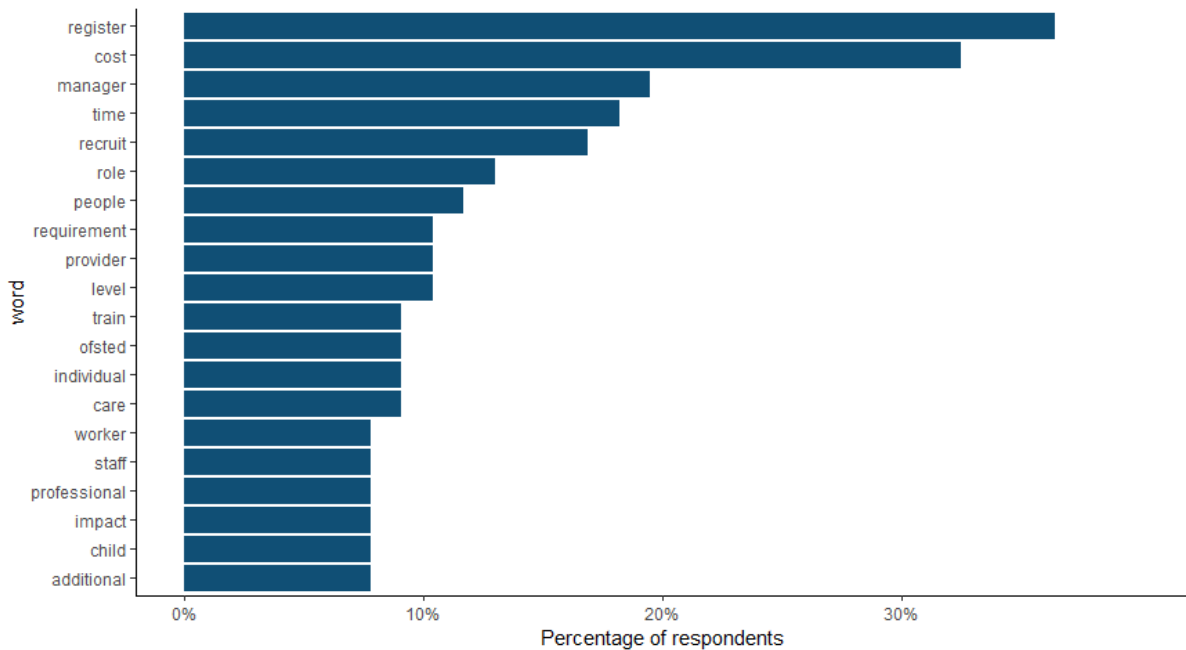
Figure 26: Commonality of bigram proportions in responses to Q11a and Q11b



Base: All who responded to both Q11a and Q11b (n=71). Bigrams close to the blue line have similar frequencies in both sets of responses; bigrams below the line are more frequent in responses to Q11a, and bigrams above the line are more frequent in responses to Q11b. Pearson product-moment correlation = 0.84.

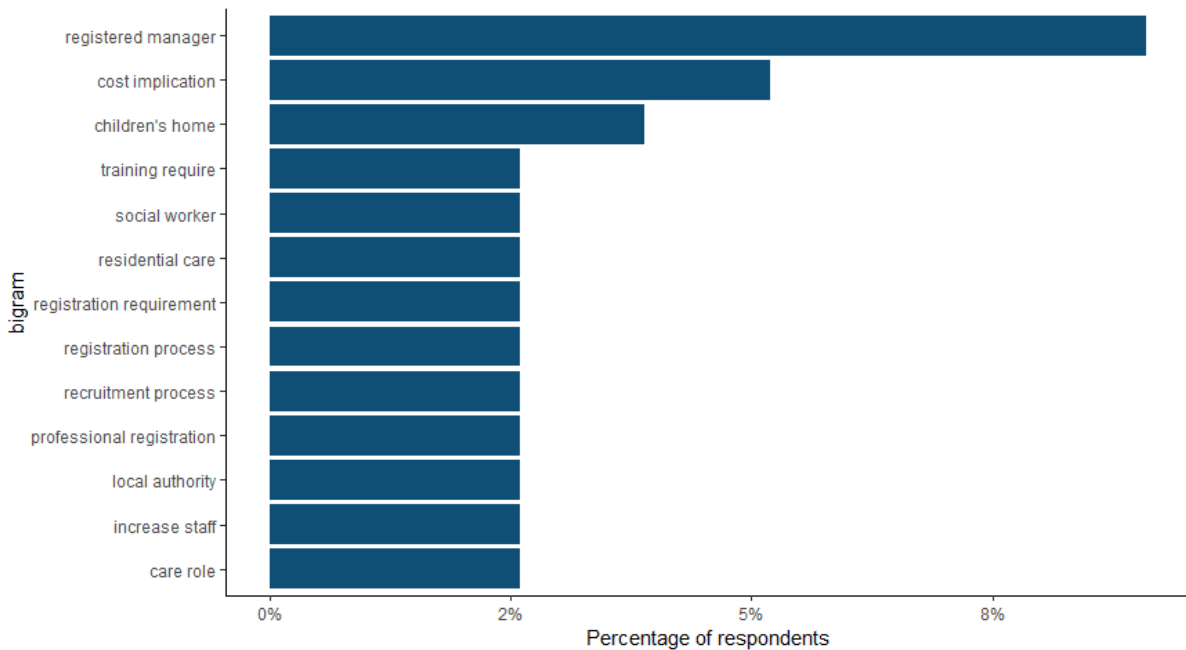
Q12a. What do you think are the potential drawbacks of establishing professional registration requirements for registered managers?

Figure 27: Top 20 words used by respondents to Q12a



Base: All who responded to Q12a (n=77).

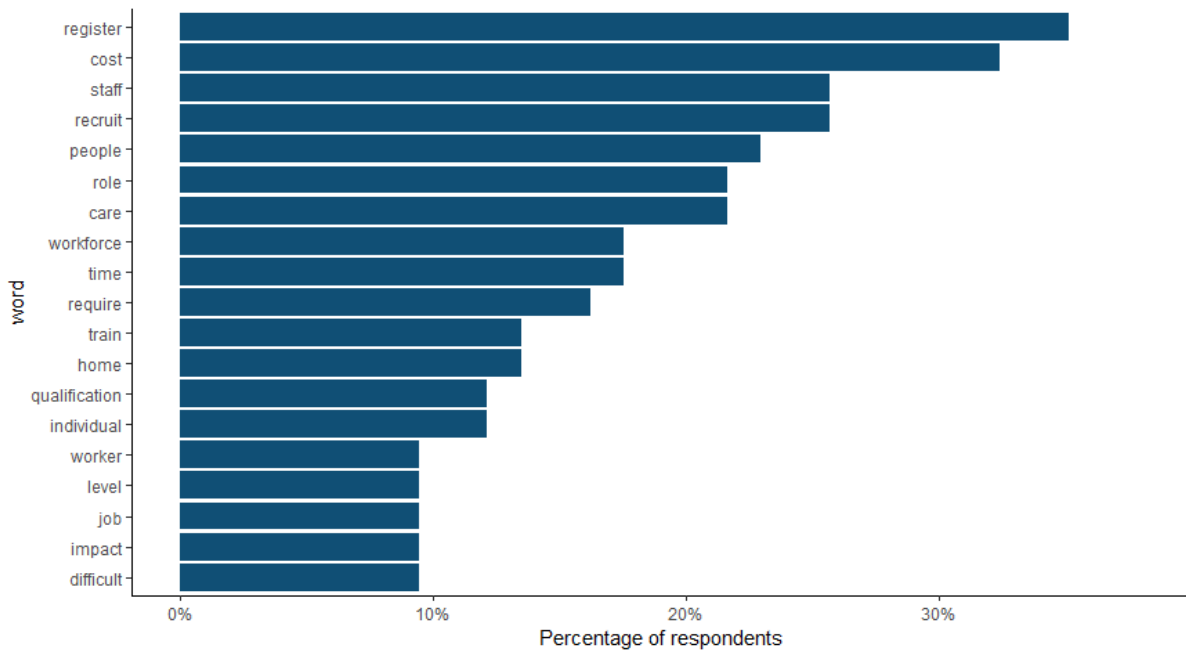
Figure 28: Top 13 bigrams used by respondents to Q12a



Base: All who responded to Q12a (n=77).

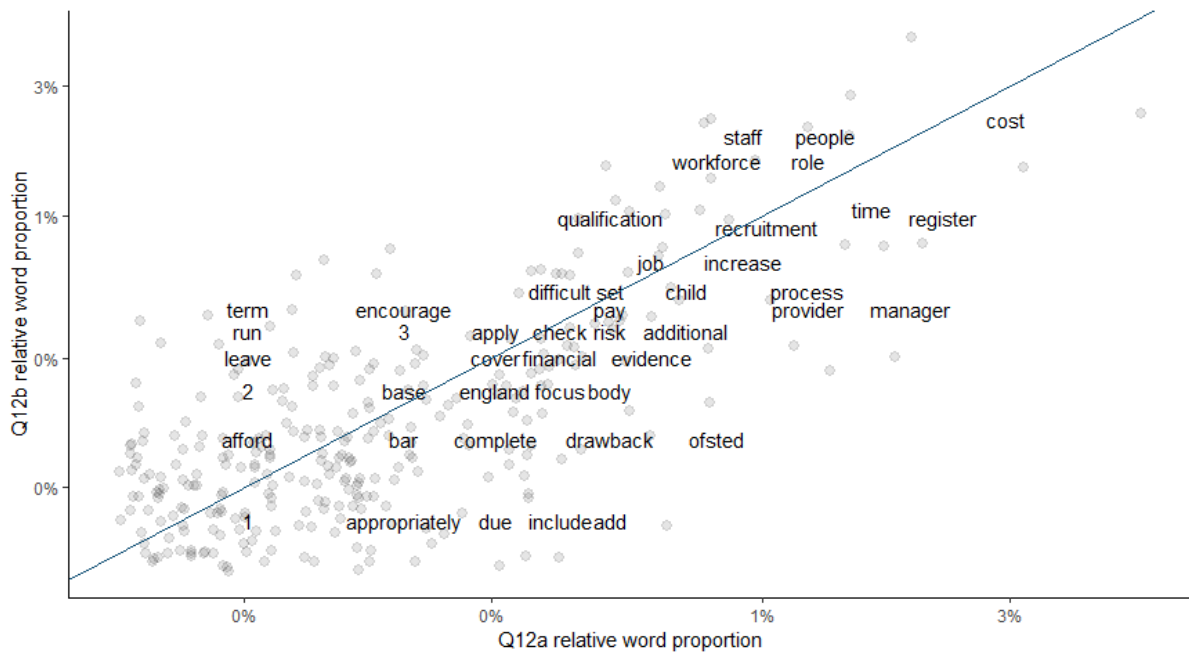
Q12b. What do you think are the potential drawbacks of establishing professional registration requirements for people in care roles?

Figure 29: Top 19 words used by respondents to Q12b



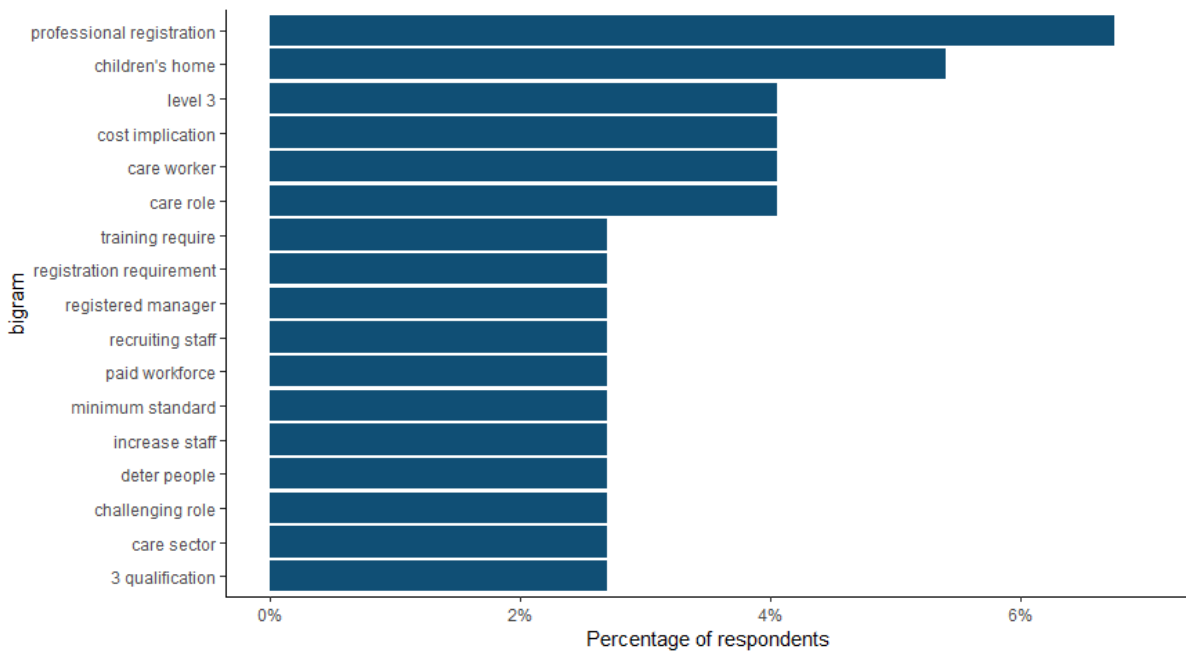
Base: All who responded to Q12b (n=74).

Figure 30: Commonality of word proportions in responses to Q12a and Q12b



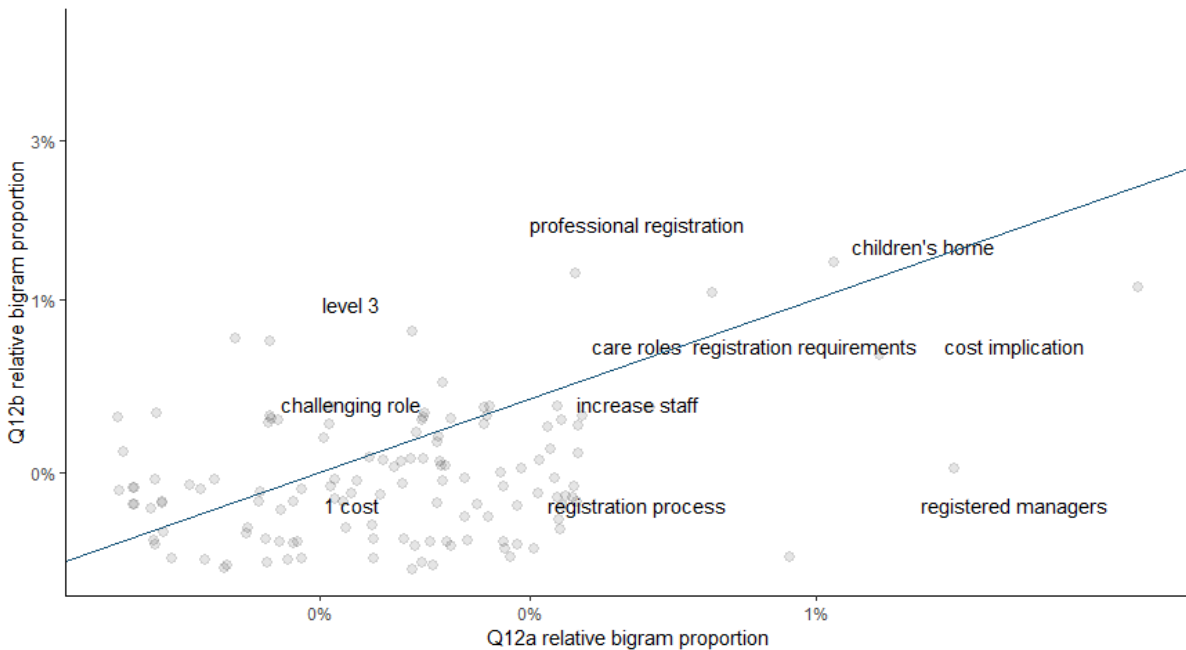
Base: All who responded to both Q12a and Q12b (n=67). Words close to the blue line have similar frequencies in both sets of responses; words below the line are more frequent in responses to Q12a, and words above the line are more frequent in responses to Q12b. Pearson product-moment correlation = 0.84.

Figure 31: Top 17 bigrams used by respondents to Q12b



Base: All who responded to Q12b (n=74).

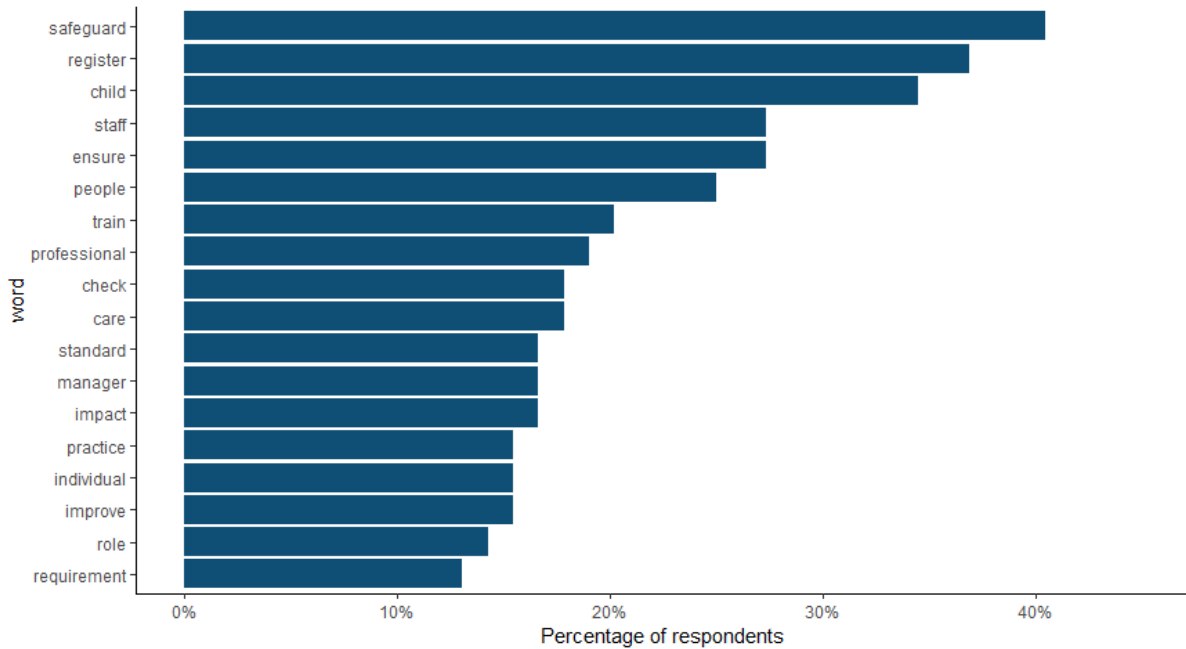
Figure 32: Commonality of bigram proportions in responses to Q12a and Q12b



Base: All who responded to both Q12a and Q12b (n=67). Bigrams close to the blue line have similar frequencies in both sets of responses; bigrams below the line are more frequent in responses to Q12a, and bigrams above the line are more frequent in responses to Q12b. Pearson product-moment correlation = 0.50.

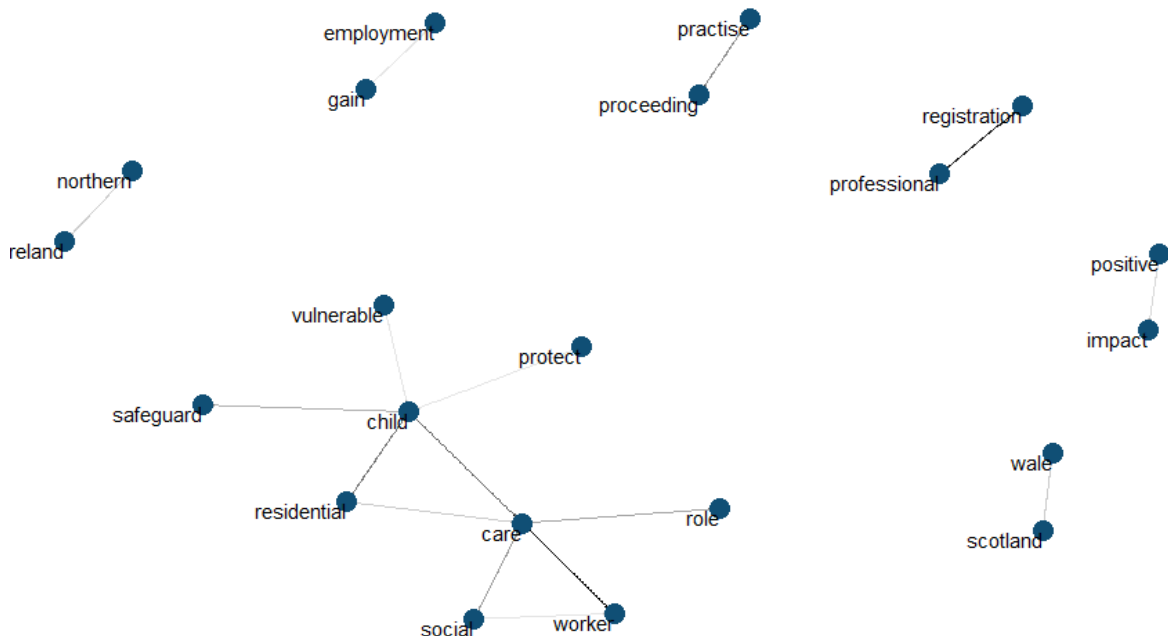
Q13. How would the introduction of professional registration impact on child safeguarding?

Figure 33: Top 18 words used by respondents to Q13



Base: All who responded to Q13 (n=84).

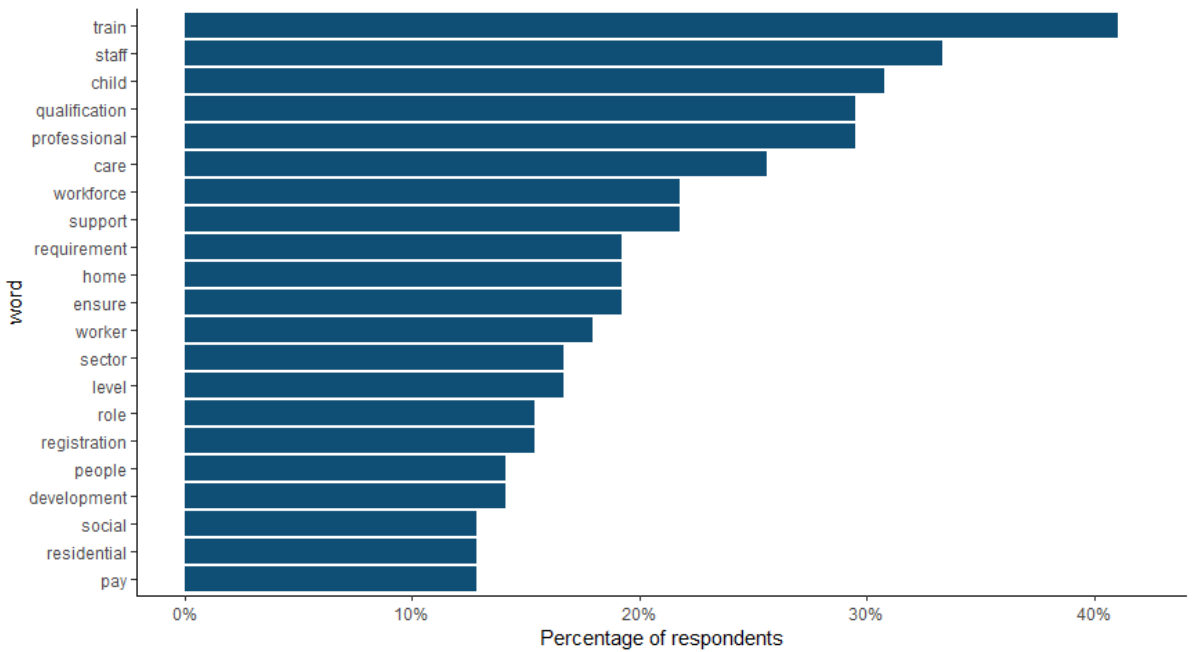
Figure 34: Network of most frequent bigrams in responses to Q13



Base: All who responded to Q13 (n=84). Bigram networks are visual representations of all word relationships across a set of answers. Lines link pairs of words, with the width of the line quantifying the weight of the relationship or how often one word is associated with the other.

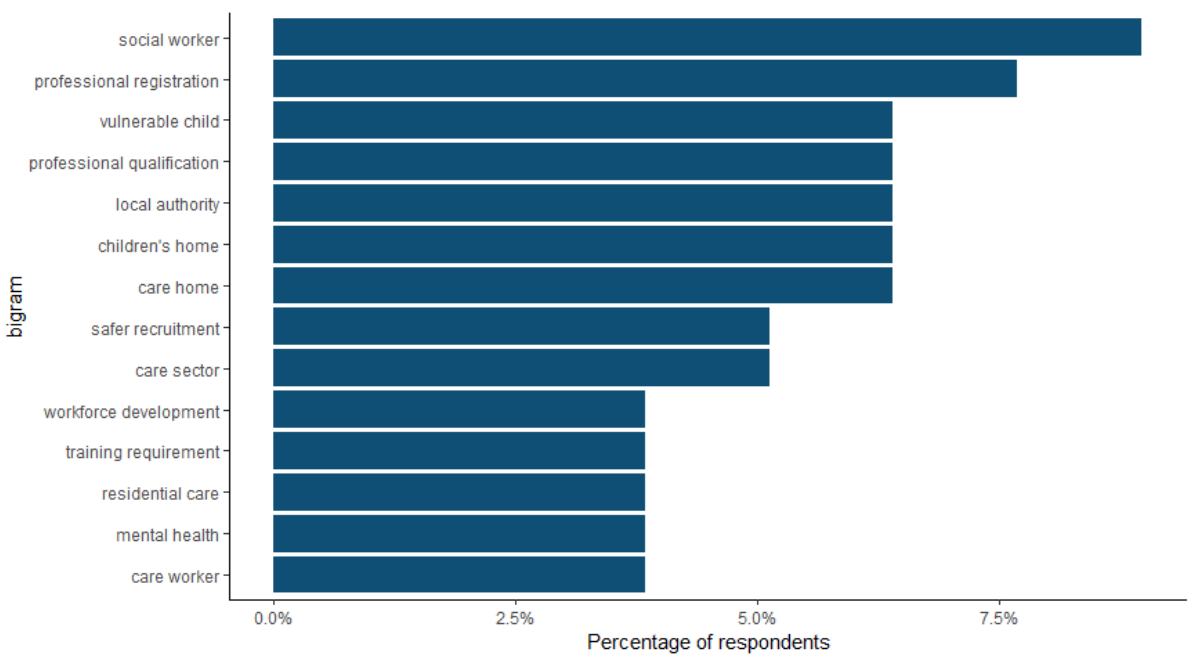
Q15. What other ways are there of professionalising the children's homes' workforce to protect children, without establishing registration requirements?

Figure 35: Top 21 words used by respondents to Q15



Base: All who responded to Q15 (n=78).

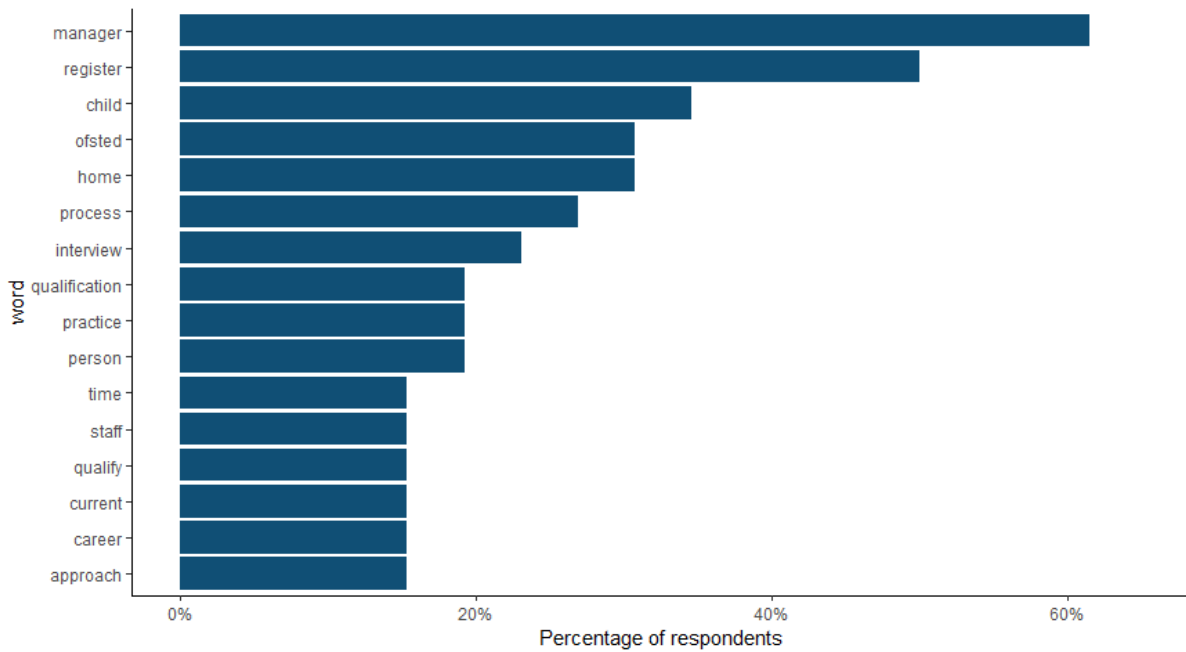
Figure 36: Top 14 bigrams used by respondents to Q15



Base: All who responded to Q15 (n=78).

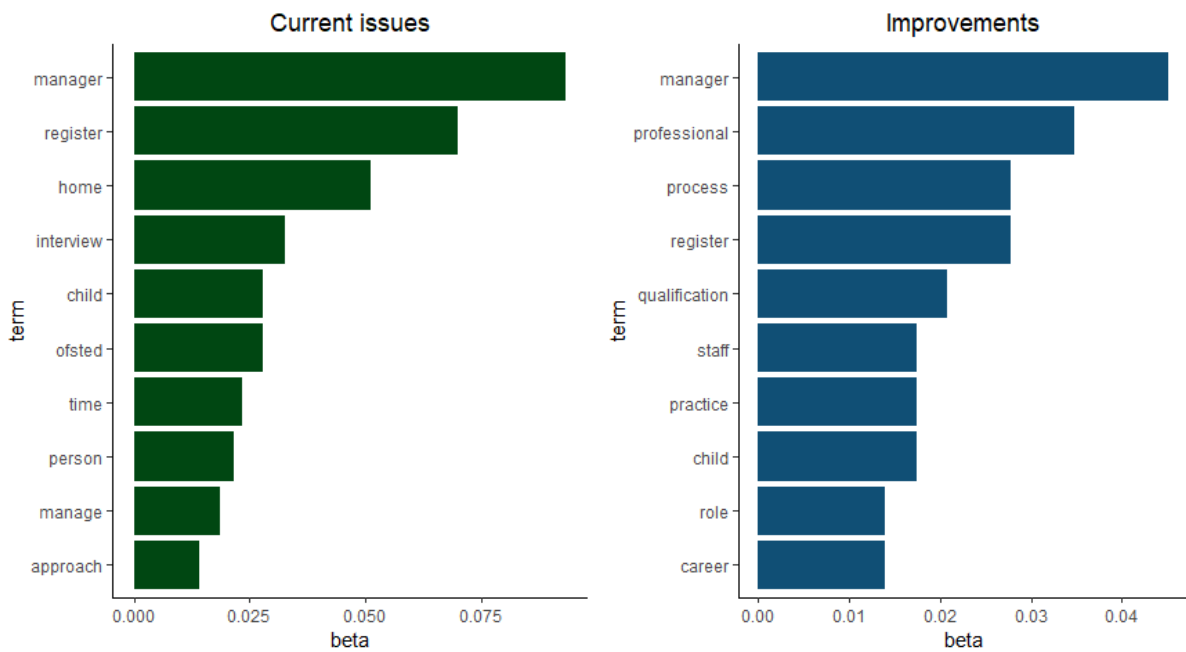
Q16b. If you disagree, please explain why the current approach is not robust enough and how this could be improved

Figure 37: Top 16 words used by respondents to Q16b



Base: All who responded to Q16b (n=26).

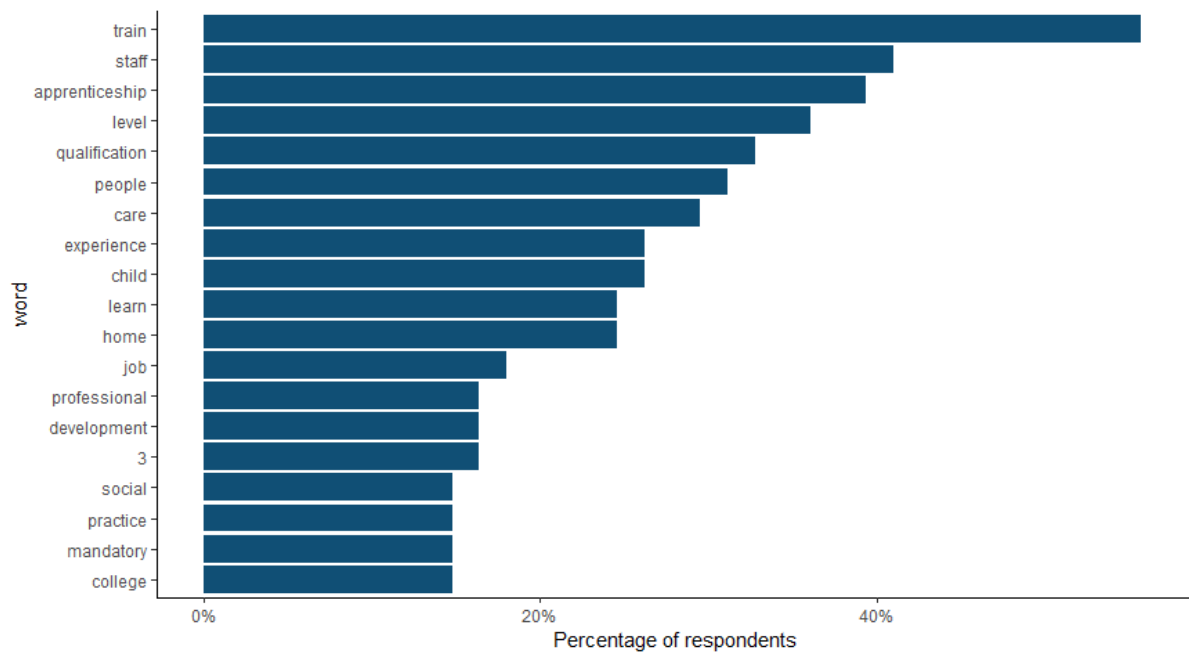
Figure 38: Top 10 words in the topics identified in responses to Q16b



Base: All who responded to Q16b (n=26).

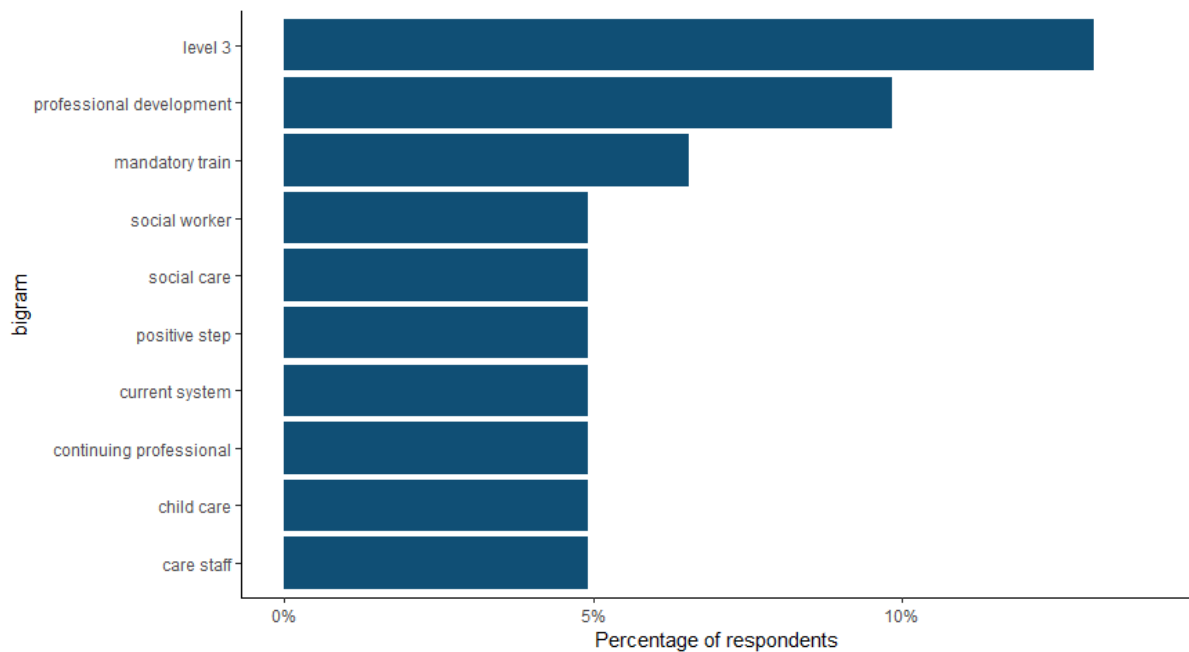
Q19b. If you agree, what form should this training take?

Figure 39: Top 19 words used by respondents to Q19b



Base: All who responded to Q19b (n=61).

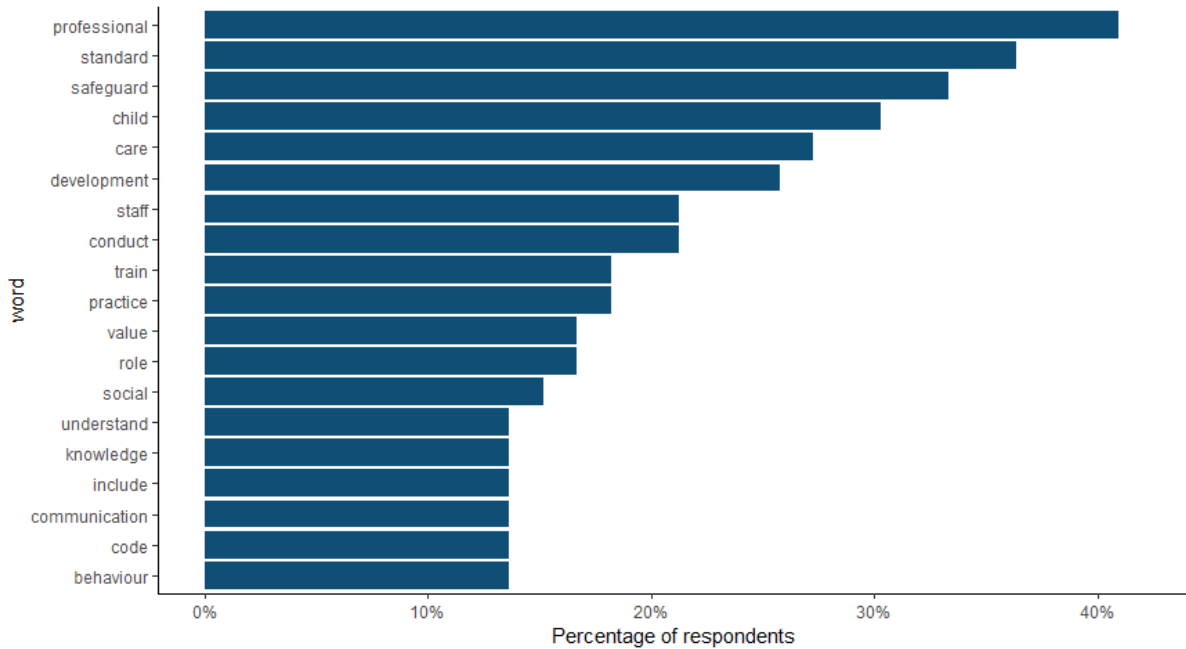
Figure 40: Top 10 bigrams used by respondents to Q19b



Base: All who responded to Q19b (n=61).

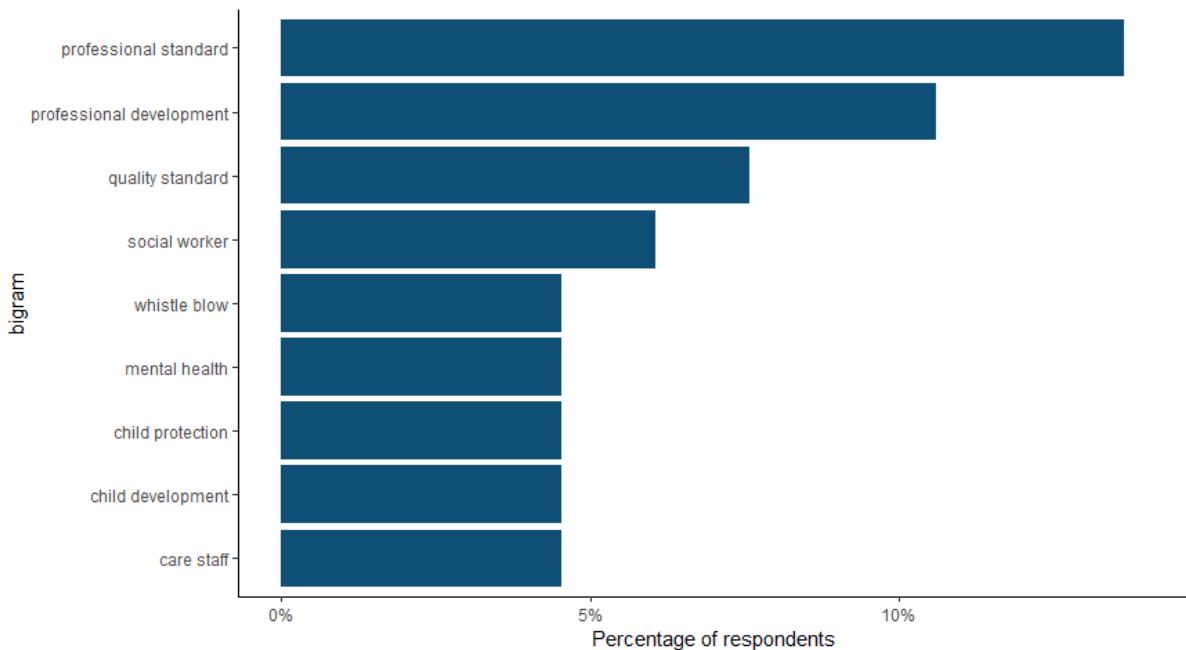
Q20b. If you agree, what should these professional standards cover?

Figure 41: Top 19 words used by respondents to Q20b



Base: All who responded to Q20b (n=66).

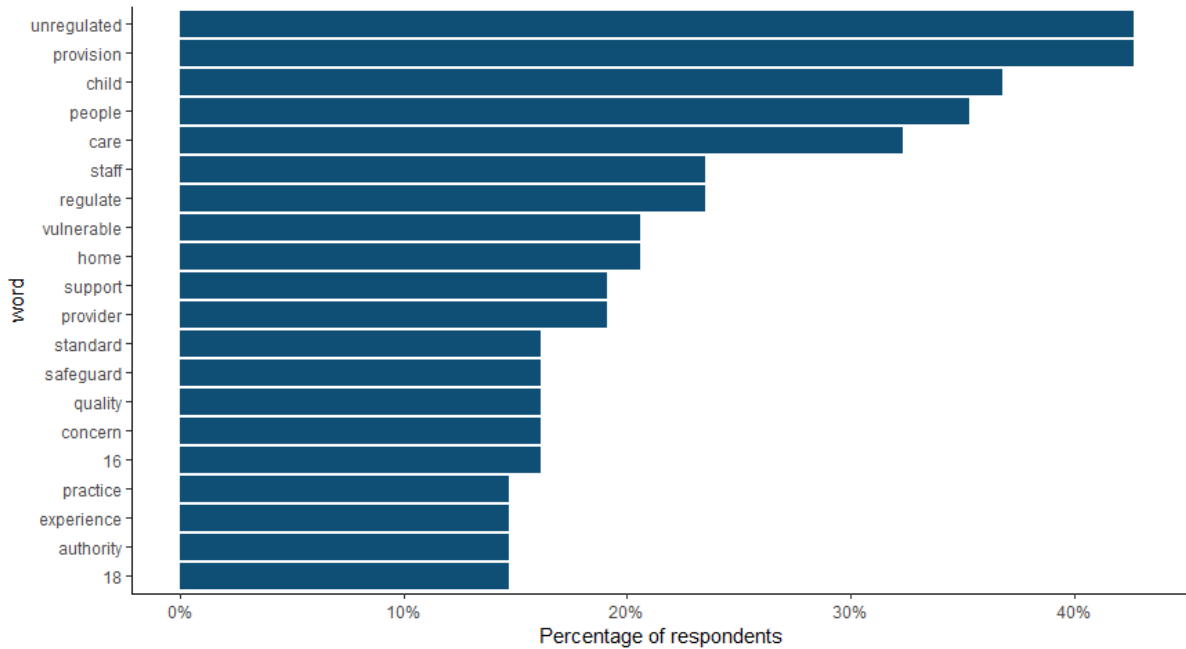
Figure 42: Top 9 bigrams used by respondents to Q20b



Base: All who responded to Q20b (n=66).

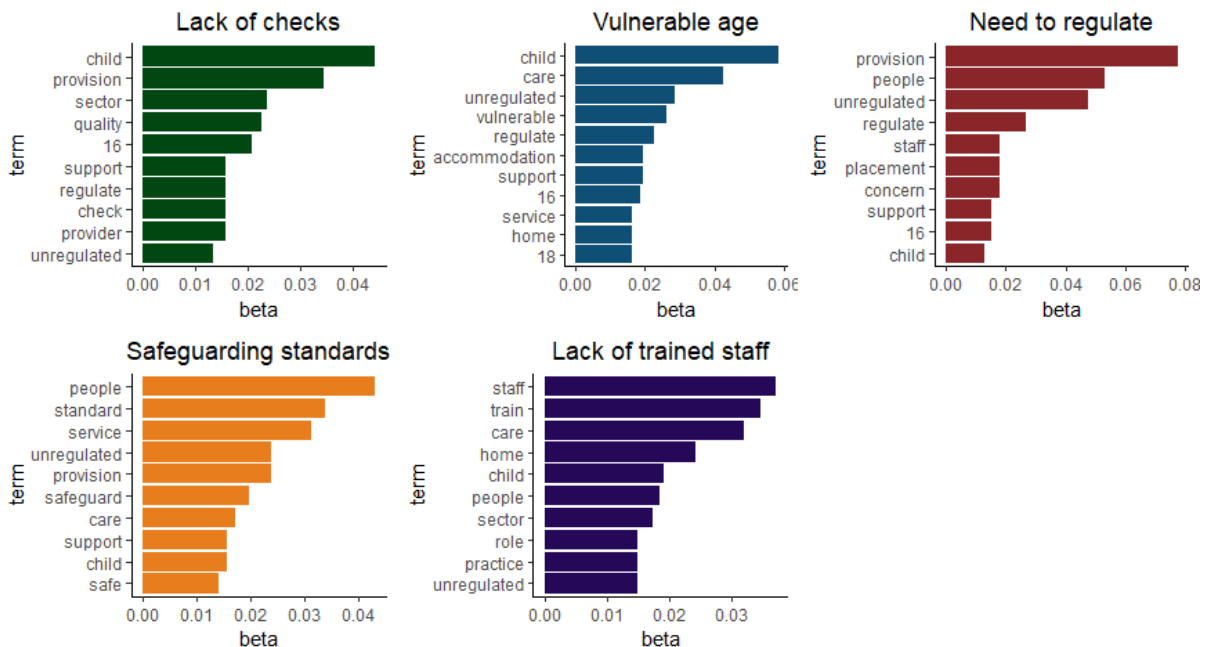
Q21. Are there further workforce concerns associated with the use of unregulated provision?

Figure 43: Top 20 words used by respondents to Q21



Base: All who responded to Q21 (n=68).

Figure 44: Top 10 words in the topics identified in responses to Q21



Base: All who responded to Q21 (n=68).

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