



# Business Plan 2019-20

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MARCH 2019

# Contents

Introduction from the Children’s Commissioner, Anne Longfield .....	2
Growing up Well.....	5
Revealing the ‘invisible’ children.....	10
Behind Closed Doors .....	13
Children in Care .....	15
Advisory Board .....	17
Budget .....	17
United Nations Convention on the Rights of the Child .....	18

## Introduction from the Children's Commissioner, Anne Longfield



At a school in Newcastle this year, I met a group of sixth formers who talked to me about what needed to change for them to have the kind of future they aspired to. They were gritty, realistic and knew where they wanted to get to in life, but they couldn't see how to get there. Later that day, I did a local radio phone-in. A boy rang and talked about how he really wanted to be a pilot and to train at the aviation school at Newcastle airport. But he couldn't afford the bus fare from Newcastle so he had given up on that aspiration. This boy

didn't know anyone in his family who had a job, yet he had forged an ambition to be a pilot, which was then smashed for want of a bus fare.

I call it 'the straw that breaks...'. This boy probably had so many odds stacked against him, that a simple bus fare seemed an insurmountable obstacle. We need MPs to be alert to the everyday reality of children such as these – voteless and usually voiceless – and to champion their rights to self-determination. And we need every corner of government to do its bit. This is what being the Children's Commissioner is all about: the eyes, ears and voice of children within Government. While my role is an important check on the system, I have always taken the view that I can achieve more by working *with* Government, wherever possible. Hence I have worked in the past year, for instance, with ministers on the Serious Violence Taskforce; with the Chief Medical Officer on advice for families about children's social media use; with the Department for Culture Media and Sport on a duty of care for social media companies; with Ofsted on off-rolling and illegal schools; and with NHS England on the development of its new long term plan. My team undertakes complex, multi-agency data collections which are crucial for informing Government policy. We regularly provide data analysis and presentations about the causes and effects of childhood vulnerability in Parliament and throughout government.

And there does at last stir within government a recognition of the signs of childhood in crisis. The first national survey of children's mental health for 14 years, published last October, showed one in ten children of primary school age had at least one mental disorder (using standard international classifications). Rising numbers of teenagers are excluded, anxious, depressed; at worst, stabbed, suicidal or forced to enter care. These are all signs screaming at society that something has gone wrong. A national inquiry will begin this year into the protection of adolescents at risk of criminal exploitation. Plans and strategies and panels and taskforces to tackle gang-related crime sprout in the offices of Whitehall and local authorities, police and Parliament. An Exclusions review is awaited, hopefully to focus on how to keep more children within the protective structure of the school system. Ofsted is proposing changes to inspections, shifting the focus away from exam performance data and onto what schools do to help all children achieve their potential, rather than just the easiest to teach. All schools will now have to teach about relationships, and children are at last having lessons about mental health.

I welcome all of this; indeed my office contributes to much of it. But it has taken an explosion of violence on the streets and a rise in teenage suicides for the underlying needs of children to become visible, and for ministers to begin to act. The Children's Commissioner's Office (CCO) Vulnerability Framework has been developed to make these invisible needs visible to policymakers. We can show how many young

kids (52,000, or 1 in 100) live in a household where an adult has all three of the most dangerous risk factors for children: they are violent, dependent on drugs or alcohol, *and* demonstrating severe symptoms of mental or psychiatric disorders. We can tell you how many babies under 1 are in these households (8,300). Some 123,630 children under 16 are technically homeless – living in bed and breakfasts, hostels, or hastily converted office blocks. The number of children permanently excluded from primary school has doubled in 4 years, while permanent exclusions from secondary schools have increased by two thirds. I regularly hear now from schools that they have to wash their pupils' clothes, feed them and sometimes even house them: one primary school head rang my office last year because two of her pupils were sleeping with their mother on a shop floor.

Children are tough and resilient but many of them cannot thrive without additional help. I know that there is plenty of excellent work being done to support children by schools, councils and health professionals up and down the country. But with the 30<sup>th</sup> anniversary of the landmark Children Act this year, it is time to focus on the 'forgotten' part of section 17 of the Act – the duty of local authorities not just to safeguard children in need but *to promote their welfare*. Analysis by the Department for Education last year showed 1 in 10 children in England had been registered 'in need' at some point over a three year period. We need to act now to help these children. Welcome as all the taskforces and panels and the focus on youth violence is, and urgent though their work, the evidence shows that intervention in kids' lives needs to come before problems spiral in order to be most effective. **This year I will produce a manifesto for childhood, to show how a society shaped around the needs of children should look.**

The building blocks of a good childhood haven't changed – secure relationships, a decent home, inspiring schools, and time. Time perhaps above all: time to play, and grow, to spend with your family and peers, time to explore, time to think. Our national, representative, survey of children, conducted to inform this business plan (and published alongside), asked what could make things better for them. The second choice from children under 12, after safer places for them to hang out, was having more time with their parents.

We live in a highly pressurised time, with families straining to meet the demands of work and childcare, fewer and fewer parents able to afford relaxed time with the kids, and schools caught in a treadmill of exam results and league tables. One in three teachers leaves the profession within 5 years and a teacher recruitment crisis is biting.

Changes to the benefits system can show callous disregard for children living in this time-poor, high pressure society. An un-noticed change to bereavement benefits in 2017, for instance, led to reductions in support so that when a parent dies, the surviving parent now has to go back to work much more quickly, affecting thousands of families each year. The effects of universal credit itself on families with children were last modelled in 2012, since when the policy has changed significantly; we are pressing the Government to assess its impact on children as part of the 'pilot' roll-out of phase two. I have personally demonstrated to the Work and Pensions Secretary how easy it is to identify families with children at risk of tipping into crisis due to the transition to universal credit – this may be a projection on a spreadsheet to an official, but to the children it can mean homelessness, mum in tears at the food bank, loss of school and friends. And yet the data and the means exist to identify these families and help them. Over 100 years ago Charles Booth and his team of researchers roamed the streets of London, notebooks in hand, methodically creating a social map of the city. It took them 7 years. Today you can do this with a computer programme and administrative data which the Government already holds. To

map the families at risk throughout England would barely take 7 days. So why on earth not do it, and help those families before catastrophe strikes?

This sort of short-sightedness – or as a child might say, mean-ness – plays out in children’s lives and ultimately in huge waiting lists for CAMHS, teenage crises, children caring for children, missing school, or going home from school to empty houses, maybe finding an alternative ‘family’ in a street gang. Our analysis of data we gathered from youth offender teams showed children in gangs within the criminal justice system are 76% more likely not to have their basic care needs met at home than other young offenders, according to the assessments of youth offending teams. Helping kids requires help for families. That’s why **a major focus of our work this year will be families and the financial and social pressures upon them.** In the chaos of Brexit, ordinary government is barely functioning. Legislation is held up, the Cabinet is enmeshed in Brexit turmoil, and the Treasury has delayed the next spending review. In the midst of all this, children are growing up. That doesn’t stop. Nor should we.

A handwritten signature in black ink that reads "Anne Longfield". The signature is written in a cursive, flowing style. Below the signature is a short, horizontal line.

**Anne Longfield OBE**  
**Children’s Commissioner for England**

# Growing up Well

## Good schools

Children of all ages worry about the pressure of exams and school. Half of the 12-16 year olds and one third of the 7-11 year olds in our consultation said a less stressful exam system would most improve life for children. Many will dismiss this as ‘plus ça change’ – children have never liked exams, after all. But international comparisons show that children in the UK report some of the highest levels of stress about exams, and lowest levels of happiness, and Childline has received increasing numbers of calls about exam-related stress over the past few years. One boy in our consultation told us<sup>1</sup>:

*“Like you have to do all these different things just to pass exams and then you finish and then you go back and do more exams until, so you can get this job, and it’s like the whole system educates everyone in the same way to get the same outcome, like robots. And so I think there should be a bit more, less focus on exams and more focus on like actually doing what you want to do.” (Teenage boy)*

The steady increase over the last few years in children excluded from school suggests either that pupil behaviour is worsening, or that schools are under pressure as never before and unable or unwilling to cope with challenging students. The answer is likely to lie in a combination of performance-driven inspection, zero-tolerance behaviour policies and school league tables, together with falling per-pupil funding.

*“They don’t look at core issues that people have – just look at the behaviour they’re exhibiting and punish or exclude them. They need to be looking more at the roots the problems.” (Girl at youth group)*

**We will work with children this year to understand better how they view the schools system, and what can be done to improve their experience of schooling without losing sight of the importance of a strong education. We will explore the use of internal exclusions and isolation booths – punishments which are frequently raised with the Children’s Commissioner’s office (CCO).**

## Happy families

Good schools are just one part of a good childhood along with a decent home, supportive communities and a stable family. High pressure, time-poor lifestyles can see children rushed from pillar to post, home alone after school, and missing out on quality time with their families.

*“I think some people worry about their parents because some of them go to work like from the morning all the way till late in the evening. So they worry about them if they’re OK and if they’re getting sleep.” (Girl, primary school)*

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<sup>1</sup> All the quotes from children in this document are from interviews we conducted to inform this Business Plan

Younger children in our consultation for this business plan cited more time with parents as one of their greatest wishes. We do not hanker after a 'golden age' where mum welcomed the kids home from school in a pinny, with tea on the table, but we do question how the pace of life today and the financial and time pressures faced by families affect children's stress levels. While the working patterns of families have changed, the school timetable—developed at a time when there was usually a parent at home after school – has remained the same.

We need to refocus on what families as a whole need to be able to support their children to develop and grow. For instance, the absence of an early years offer for families from birth to school means we don't know how children are developing at this critical stage, what help they need nor what is being spent. Without this, we cannot target support where it would be most effective.

Early help throughout childhood, before crises develop, is critical. **Our current work with a number of LAs to understand their funding pressures has highlighted that funding for targeted services to support families before they enter a downwards spiral has been decimated. As part of the manifesto for childhood we will examine these issues and propose how a society shaped around the needs of children should look.**

Another theme which came out very strongly in our consultation with children, is the lack of safe places for them. Safer places to hang out was rated second only to a less stressful exam system as something which would make things better for children in England. Even primary school children told us they felt 'followed' or pursued in some way in the streets: whether being filmed by strangers, being chased, or feeling threatened by other children. It is hard to know whether this reflects real or perceived dangers.

*"I've been chased by someone....I just, as I was, with my bag and this person who is naturally just walking and suddenly I looked back, he looked at me and he started running. I managed to lose him down one of the paths but as soon as I knew that I'd lost him I text my dad to say, come and pick me up from where I was.... I went round the corner, I went round the corner, hid, and obviously where I hid, I just hid somewhere." (Boy at primary school)*

Fears seemed to be heightened among children with autism, some of whom described regular bullying in the street.

*"I walk by myself to school sometimes and sometimes I get bullied by people on the street. I was walking home on Saturday and then when I come back home there were two kids trying to be rude and punching me and I had to run away home – they were strangers and I don't know them and I felt scared so I had to run away." (Teenage boy with autism)*

Older children were also afraid of knife crime and terrorist attacks; and girls of sexual assault.

*"I think for me and lot of people my age who are girls, like especially, we always worry about sexual assault because the school that I go to isn't really surrounded by a lot of houses, so people have to take buses home, have to take, have to walk home. I have to have at least, I have to whenever I go out, I text six people where I am and say, if I'm not back by this time, ask me where I am, text me and if I don't respond, you know what to do. And I think it's an increasing number of young women that I know, but I'm not sure about men because obviously I'm not a man, but I know it happens a lot with me and a lot of people that I talk to." (Disabled teenage girl)*

This is not only affecting children's sense of personal security, but their choices about when and where to go out in public including when to attend clubs and after school activities. **We will work with children to understand this phenomenon better and make proposals for creating safer streets.**

*"The fact that we don't have as many youth clubs anymore has led to children just they're literally out on the streets, basically, they have nothing to do and then... for example I had this friend that he was not, he is not gang affiliated or nothing, he was literally outside, and he got stabbed, they got the wrong person, you can't even go outside and feel safe anymore, so yeah." (Male college student).*

### **Strong minds**

*"How many people are depressed is so unbelievable, like I know so many people for example they just got depressed when they were so, so young and they feel like they're trapped, and they don't know what to do." (Young woman in college)*

In January the NHS 10-year plan announced a welcome, and much-needed, expansion of specialist child and adolescent mental health services (CAMHS). This is something the Children's Commissioner has long called for. It isn't enough and it isn't fast enough, but we welcome the progress being made. It is sad that most teenagers tell us of poor experiences with CAMHS, due to services being under such huge pressure. The CCO knows that CAMHS does some extraordinary work; but we want the service better resourced and the best of CAMHS available more widely.

Specialist services will only ever be part of the answer, however, and the Commissioner has consistently argued for a broad approach to supporting children's mental health with a focus on services that are easily accessible, such as in-school counselling and online support.

*"There was this girl last year... She literally tried to kill herself and only then was she referred to CAMHS. Like she had, she showed signs of so many mental health issues before that, she even went to teachers and said, I'm not feeling well, could you please refer me to CAMHS. And you know they said, no, we can't. And it only took to the point where she'd literally tried to take her own life by drinking bleach that they actually realised." (Teenage girl)*

Unfortunately, the provision of low-level mental health services is fragmented and piecemeal, with responsibility for funding early support services divided between the NHS and local authorities. Who is responsible for providing these is contested and opaque. Previously, NHS England agreed it was its responsibility to provide both 'targeted' and 'specialist' services, yet more recently it has claimed that its responsibility stops at specialist services. What, if anything, local authorities provide within either public health or children's services is unclear; while some, but by no means all, schools provide some in-school counselling. The result is that for a child who needs early help, what is available is at the discretion of the local school, council or NHS body – an unacceptable and impenetrable postcode lottery.

*"With young people, the kids that have the most support are the people with like mental illnesses or the higher risk kids. But then you look at some kids and you think, oh they look fine, they look like they're all right, so you think they're going to be all right and just don't really pay much attention to that... it could affect anyone, they [school staff and other professionals] just don't think of it like that." (Teenage girl in secure children's home)*



We know that roughly a million children need mental health support, but for those turned away from specialist services, we don't know what, if anything, is available. This is because until we did the work last year (see below), no one took responsibility for auditing who was providing what to children who needed help, despite repeated calls from numerous bodies, including the Health Select Committee in 2014, for this to happen.

**This year, we will work with NHS England, Public Health England, the LGA and the Department for Education to encourage them to collect information about the provision of mental health services below the threshold of CAMHS and design benchmarks in order to drive accountability.**

### **Well connected**

Through our work on children and teenagers' wellbeing online we have been calling for greater safeguards including a statutory duty of care for social media companies. We are pleased to see that the Government is considering introducing a duty of care and a new regulator for these companies. The stage is set for the UK to lead the world in the development of robust accountability in the digital sphere.

We welcome the decision of Facebook/Instagram to remove self-harm content, but regret that it has taken many years of lobbying and the deaths of vulnerable children to prompt them to act. We are concerned that the slow pace of this response will be repeated as new online threats emerge, and will work with government officials to ensure the new legislation best reflects the particular vulnerabilities and needs of children online. Children tell us they are often shocked at the content they see, from pornography to weapons and beheadings, and at the obliviousness of social media companies when they report alarming content.

*"I feel like at a younger age people have been exposed to things that we shouldn't be exposed to... when you're on social media you are literally exposed to a different life... say for example Instagram, you can follow the page like on, they do a review of guns or whatever. You can literally find anything on social media." (College student)*

Younger children want websites to be more secure, telling us in our consultation that they want help to stay safe online. They would like it to be harder for them to lie about their ages and access sites that are not age appropriate – but they also want parents to help them, for instance showing them what is and isn't safe. Older children have emphasised to us how important it is for parents to understand the online risks their children face and to learn how to protect them. A new concern emerging in our consultation with children related to video games which expose kids to inappropriate content. Children talked about two problems in particular: being approached by strangers within a game, and in-game adverts that seem to be much more violent than the certification should allow.

*"I think parents need to be aware of it, or just show parents what their kids could possibly see, traumatise the parents a little bit into showing, well your kid is going to see this on Instagram or on this website." (College student, female)*

*"And that [video game], I had it, my mum said I can have it because she trusted me and I was still worrying about what could happen, but then once I really got into it I was fine. But then I kept on watching it and it just scared me to life and I knew I shouldn't trust it." (Primary school girl)*

In order to keep policymakers' focus on emerging as well as widely recognised threats to children's welfare online, we will focus this year on the way children use and are used by the online gaming industry. We will conduct focus groups with children, as we did two years ago in our 'Life in "Likes"' report, to find out how they use games, explore addictive and immersive technology, and highlight the grey areas between gaming and gambling.

## Revealing the ‘invisible’ children

Children will fight and fight to help their families survive, even in the most difficult circumstances. We know that some 130,000 are young carers, for instance, not recognised or supported by the state. Many more live in households blighted by alcohol, drugs and violence; or in families unable to feed them; in B&Bs and hostels; and in homes traumatised by the imprisonment of a parent. If we as adults don’t go out and find these children, we will not see them – they will not come to us. Many do not realise they need or are entitled to help, some are frightened of authority or may have been told by their parents to keep things within the family. In hundreds of thousands of households up and down the land, children are struggling in silence. But problems attract problems, and layer upon layer of difficulty crystallises in the end. We as a society end up with the headline cases – the kids in knife fights, the young drug dealer, the traumatised teenager needing the protection of a secure welfare bed. These problems do not happen overnight, they grow as a child grows, and as we allow them to. We get the society we choose.

At CCO we define ‘invisible’ children as those children with additional needs not in receipt of specialist or statutory services. The Children’s Commissioner’s Vulnerability Framework is the first systematic attempt to gather all the information known about childhood vulnerability, as well as what is not known, in one place. This helps guide the work of the Children’s Commissioner in identifying where further investigation may be required to assess the issues faced by particular vulnerable groups because current data is inadequate, such as knowledge about the numbers of children in mental health or other forms of detention, or the issue of off-rolling, where there are hidden issues facing children invisible to the system. The difficulties presented by groups of marginalised, excluded, invisible children whose needs are not being recognised or met by local services have hit public consciousness over the past year in a series of shocking incidents where children have been involved in knife crime. Children should not have to hit the headlines before their needs are recognised.

**In 2018, we found that over 2 million children in England are living in families with substantial complex vulnerabilities and of these, 1.6 million have no established, recognised form of additional support. In our annual report to Parliament this summer we will have improved estimates and will produce reports for each local authority alongside. We will develop our webpages around the framework this year to enable members of the public, researchers, MPs, charities and local service commissioners and providers to see the level of childhood vulnerability in their local area.** And, having found particular gaps in knowledge about multiple forms of need, we will continue work to bring datasets together to understand how forms of vulnerability are inter-related, with a focus on adolescents living with multiple vulnerabilities. We will also focus on children with uncertain nationality, where the picture is very unclear, and request data from the Home Office to explore the issues children face in applying for citizenship.

We shone a light on some of these children last year, in our report ‘Skipping School’, which describes how they become ‘invisible’ to the system through practices of off-rolling or illegal exclusion. It highlighted that, in the areas we studied, half of removals of children into home education (symptomatic of off-rolling) came from 10% of schools. We passed the names of these schools to Ofsted and to Regional Schools Commissioners but did not publicly name them as the survey was a snapshot of just 11 local authorities. **This year we will survey all local authorities in England to discover which schools remove children into home education and how often, and publish detailed results.**

We also found last year that the police and children’s services are aware of just a fraction of the total number of children in gangs, or on the periphery. Moreover, we found that the safeguarding boards responsible for co-ordinating efforts to keep children safe were either ignoring gangs altogether or vastly under-estimating the scale of the threat locally. Following on from our research, we are working with a few police force areas to understand best practice in terms of identifying children at risk. We will share this learning nationally through the Serious Violence Taskforce and encourage ministers to lead this work with police forces throughout the country and other local services. Our aim is to ensure that the successors to local safeguarding boards – which come into force this year – will be much better placed to lead the response to these serious threats to children.

There are other children who are ‘invisible’ because they may be slipping through gaps in support between CCGs and LAs. Last year we issued a statutory information request where we asked for every CCG Accountable Officer, Director of Children’s Services and Director of Public Health to tell us how much they spend on non-specialist mental health services and on speech and language therapy; a use of our data-gathering powers to map provision which has never been mapped before. The results showed significant variation in spending, with many areas also seeing spend per child fall, in spite of rising demand and an overall increase in funding. Just £14.15 per child is spent on non-specialist mental health services in England (our findings for speech and language therapy will be reported in the summer), with the amounts varying according to the generosity of local authorities and NHS clinical commissioning groups: a classic postcode lottery, operating in murkiness. Yet the results were undermined by gaps in data because many local agencies did not know what was being spent by others in the local area, demonstrating a lack of clarity and accountability for mental health provision locally.

**The Commissioner believes the provision of early help mental health support for children is too important to be left unmonitored nationally. We need clear national guidelines as to who is responsible for providing what, and benchmarks for the quantity and quality of provision, supported by regular monitoring of what is being provided at a local level. We will share the data we collected with Public Health England, NHS England and the Department for Education – the bodies who should be monitoring this provision – and work with them to encourage them to gather this information themselves in future in order to hold the system accountable and ensure that children are receiving the services they need. Until it is collected by central Government, we will continue to collect it ourselves, with a second data collection planned for 2020-21.** We are pleased that Simon Stevens, chief executive of NHS England, has personally pledged to Parliament that NHSE will work with us on this and we will update Parliament on progress during the year.

As our 2018/19 Children’s Mental Health Briefing demonstrated, despite some improvements, on the ground progress remains frustratingly slow, meaning too few children are getting help from CAMHS, with long waiting lists and high numbers turned away.

*“In [my city] there is a massive problem, I’m sure across the country too – massive overcrowding. Those who want to go to CAMHS have six months between appointments – I have seen it with my friends – there needs to be a better, more secure way for people to get access.” (Older girl in youth group)*

More concerning still is the regional variation in provision with some areas consistently failing to invest in children’s mental health services. **To assess progress against the NHS’ stated targets and to enable**

**proper scrutiny of local decisions, we will repeat our Mental Health Briefing in 2019/20 to see whether local areas that performed poorly have improved.**

The Vulnerability Framework already enables us to assess unmet need among some specific groups. Last year, for instance, we exposed the gap in services for babies and young children living in households where the so-called ‘toxic trio’ of parental drug and alcohol abuse, severe mental illness and domestic violence are present. These children are known to be at particular risk of abuse and neglect, yet we estimate there are tens of thousands of young children living in such risk households. Some 30,000, including 3,300 babies under 1, are not on child protection plans.

Analysis from the Department for Education last year found 1.1 million children – almost 1 in 10 – were known to children’s social care over a 3 year period; classified as at risk of abuse or neglect, dealing with domestic violence or parental ill health or substance abuse (or all three), or in a family classified as being in “extreme stress”. However, the commitment in the Conservative manifesto to examine the support available to these ‘children in need’ was shrunk to a review of their educational outcomes. This showed that the support being offered to these children is not doing enough to help as only a quarter of children in need reach the expected standard of development at primary school, while average attainment at the end of secondary school is half that of the rest of the population.

With children’s services funding under enormous strain, and the Troubled Families programme due to end in 2020, it is essential for central government and LAs to understand better the pressures on funding. **We are working closely with 12 local authorities to understand how much they spend on different groups of vulnerable children, in order to inform the Government’s Spending Review.** We have found that councils spend a huge amount of their children’s services budget on a few children with acute needs, and that a shortage of places in specialist children’s homes and foster provision is pushing up costs for this cohort. One local authority reported to us that they were spending 5% of their budget supporting 8 children, leaving less than 1% of their budget to support over 500 children accessing early help. There is also a growing number of children with very high special educational needs, in particular those with autism spectrum disorder, and the cost of providing school places and wider care for this group is adding significantly to funding pressures on other services.

**Our work with these areas is highlighting where money is spent but also showing where there are big opportunities to support children more effectively in targeted early help for families. In the hard pressed world of children’s services we cannot afford to spend money badly. This analysis will inform the Government’s Spending Review, for the first time putting the needs of children at the heart of national decision-making around spend.**

**We are also working with the Office of National Statistics, the Economic and Social Research Council and a consortium of universities, charities and What Works centres in a new partnership on data for and about children.** We will improve data on vulnerability through linking and matching administrative data. In time this will enable us more accurately to report on trends in vulnerability and need, and help society and government ensure that children’s needs are better met, that children’s views are heard with impact and that provision for children and families has fewer gaps, with fewer invisible and missing children and with improvements to the wellbeing and welfare of children through more efficient service provision, better join up of services and a greater focus on children’s wellbeing.

## Behind Closed Doors

The Children's Commissioner has powers under s.2E of the Children Act 2004 to enter any premises other than a private home, to speak to children and observe the standard of their care. We regularly visit children in young offender institutions, secure training centres and secure children's homes, and long-stay patients in NHS secure units, and use their experiences to inform our policy work. We are concerned that there is no clear national picture of the number of children detained in all types of provision in England, the length of detention, and their outcomes. In 2018-19 we worked with NHS England to ensure the publication of the first comprehensive effort to map the location of all beds for children in the health, welfare and criminal justice secure estate and outline what we know about which children are in them, and why. We built on that publication by producing our own analysis of which children were held in secure accommodation and also highlighted what we *didn't* know about where children are held securely, often for long periods of time, under provisions of the Mental Health Act or deprivation of liberty authorisations from the High Court. These children may be living in assessment and treatment units, residential special schools and children's homes not registered as secure.

**We are committed to continuing to shine a bright light on this area of public policy where children are deprived of liberty, often for many months or even years, beyond the visibility of policymakers and the public; and we believe our visiting and data-gathering powers make us uniquely placed to do so.** Our best estimate is that there may be almost 1,500 children locked up, one way or another, in England, on any given day. They are detained under a variety of systems, laws and regulations, some of them opaque. Our analysis and calls to our Help at Hand service suggest their rights are regularly abused. For example, if parents have to make a 200-mile round trip to visit their child who is stuck in hospital unnecessarily, this is a denial of a child's right to a family life. Many detained children are in care; while others have parents themselves bewildered and frightened by the legal system and uncertain how best to represent their children's interests.

**Children locked up, often out of sight of authorities, will be a major area of focus for the Help at Hand service, evidence, policy and communications teams in the forthcoming year. We will visit children in different types of closed residential setting across the board, highlight instances where children fall through the gaps in the current legal framework and where the system is opaque, and work with children to ensure their best interests and rights are respected when they are deprived of liberty for any reason.** Resources permitting, we will produce an annual report about the location, length of stay and outcomes for this particular group of acutely vulnerable children.

**We will also publish in spring/summer 2019 a report examining the experiences of children with autism and learning disabilities stuck in inpatient mental health settings, exploring why so many of these children end up in hospital unnecessarily or struggle to get discharged home. And we will show, from information gathered from NHS England, the extent of knowledge about the provision of inpatient mental health units for children, the demand for these units, and estimates of how long children spend in them.** These are some of the most vulnerable children in the country, yet we know shockingly little about them: how many children require in-patient care? How many are turned away? How long are the waiting times for a suitable bed? How far from home are they? How many are stuck in hospital unnecessarily while waiting to be discharged because of poor support in the community? The Commissioner used her statutory powers to request answers to these questions from NHS England, answers that NHS England was unable comprehensively to provide. After 18 months and repeated statutory data requests, we now know more than we did, but there are still big gaps in our knowledge.

**We will, therefore, make a statutory request of NHS England that they gather this data next year, so that we can assess:**

- 1. How many children are referred to in-patient mental health care, how many get admitted and how long they wait;**
- 2. For those who are admitted, how far from home they are placed, and how this varies between conditions and regions;**
- 3. How long children stay in inpatient wards and how often they are moved between hospitals;**
- 4. How many children are in adult wards or other unsuitable settings.**

**We will continue this monitoring throughout 2019/20 and publish our findings at the end of the year.**

**We will also continue our programme of visits to children in the criminal justice estate. Where possible, we will continue to take influential policy-makers with us on these visits.** We will campaign for an end to segregation and isolation for nearly all children in the criminal justice estate, and for better, more caring provision to be made for those – often with serious emotional and mental health difficulties – unable to manage on standard wings.

Our focus on resettlement provision for looked after children released from custody has found a system bedevilled by administrative confusion and buck-passing, with Young Offender Institutions and Secure Training Centres blaming local authorities for failing to provide adequate accommodation in time for release, LAs blaming YOIs and STCs for failing to provide adequate information in time, and all of them blaming CAMHS for failing to offer the community support needed for many of these children to be released safely. Our judgment is that *all* of these problems co-exist, and that a system built around bureaucratic boundaries and additionally hamstrung by funding cuts and service constraints, is not meeting the needs of this highly fragile cohort of young people – and that they and society will pay the price. We will work with central Government to highlight where the current system lets down children or the public, wastes taxpayers' money and perpetuates a cycle of personal and social failure and wasted opportunities and costs.

## Children in Care

The Children's Commissioner has a particular responsibility to children in the care system. Our Help at Hand service responded to some 1,200 enquiries from children in care, their advocates and foster carers – and sometimes their parents – last year. We work with local authorities to resolve issues co-operatively, to ensure children's views are listened to and their rights adhered to. **This year we will publish a report on the provision of advocacy for children in care, building on our experience through Help at Hand.**

We never turn a child away: all enquiries are listened to and where possible the child is spoken to, in order to understand what they want. Advice and information is provided and where necessary the referrer can be signposted to a more relevant organisation such as the local advocacy service or Coram's 'Always Heard'. We will also contact local authorities on behalf of a child to share their concerns and refer children to advocates when they are entitled to them. Where authorities are not responsive, we escalate matters to Director level and in extreme circumstances to Ofsted. In the past year we have helped children who have contacted us about imminent and unwanted moves to new foster carers or homes, who have been held in secure settings for too long because there are no community placements available or for whom delays in resolving their immigration status mean they are at risk of homelessness.

**Help at Hand also represents the wishes of children accommodated by the state in youth custody, health settings and residential schools and we intend to expand on this area of service this year. In 2019-20 we will embed the Help at Hand service more intensively within the policy and communications activity of the Office and link it closely to our Evidence function, in order that it becomes the portal for further investigative and analytical work across the office.** Help at Hand is our primary, day to day, channel to children who are the most vulnerable in society. We think we can do more to harness the voices of those children who contact us, to help them personally but also to enable their experiences to shine a light on areas where children's rights are being breached. Hence our activity through Help at Hand is intricately connected to much of the rest of the activity in this business plan. **We will appoint an 'investigative researcher' on our policy and public affairs team to scrutinise in more detail those issues raised with Help at Hand. We will also use our digital platform for children in care, IMO ('in my opinion'), to raise awareness of the rights of looked after children and call for further evidence from children where issues are being raised repeatedly with Help at Hand.**

IMO went live as a digital platform in June 2018. By March 2019 it was receiving over 4,500 views a month and had a social media following of 1,300. Supported by generous donations from, among others, the BBC, Google, Victoria & Albert Museum, Headspace, Birchbox and Tastecard, IMO serves as a meeting point for children in the care system and care leavers, offering opportunities and gifts to support their wellbeing but more importantly, a way for them to make themselves heard. **It is our aim to raise society's ambition for children in care, hence we want to make IMO a platform for great job, university and apprenticeship opportunities for care leavers.** We have agreed with the Office for Students to collaborate to improve access to higher education for this group of teenagers over the next year, using IMO. All content on the site is created or curated by looked after children or care leavers, and includes blogs, vlogs, animations and podcasts. Regular user-led campaigns and competitions are run on the platform, including a writing competition sponsored by the AA with a first prize of 40 hours of driving lessons.



IMO is available as a forum for policymakers to consult children in the care system. As a new digital platform, we are incubating it and have taken on an additional member of staff to manage and develop it. **In 2019-20, we will explore the potential for spinning off IMO into a social enterprise run by children in care and care leavers on a sustainable financial basis.** However we recognise the fragility of a new digital platform and will also look for other models to expand its potential and secure its success, such as a team of young people with care experience running it semi-independently supported by staff from the CCO. We have heard from care leavers of the value of learning from one another:

*"[Get] more people in that have those personal experiences that could possibly change policy and front line work, because they've been through it, because we know what works, what doesn't work, we're able to be part of a group where younger children in care are part of and be able to update our views..." (Care leaver)*

The same girl told us of the importance of feeling part of something for children in the care system:

*"Like all your life you just want to be accepted by somebody, whether that's your friends, whether that's in a classroom with peers, whether that's by parents. And when you've been through the care system, sort of as many times as you may have been, or your own circumstances, you sort of sometimes don't feel accepted or wanted."*

This highlights the importance of stability – of friendship groups, school, social worker and placement – for children in care. All children crave stability, but for a child with a disrupted family background, it is even more critical. Yet our annual Stability Index – data analysis created by the Office – shows that only 1 in 4 children in care will keep the same home, school and social worker for a year, and only 1 in 10 will do so for two years.

The Index tells the story of how too many children in the care system end up 'pinged' between placement and placement, social worker and social worker, school and school. This year we have given detailed reports to 78 local areas to help them understand how well they are doing compared to other areas, and which groups of children they might need to focus on supporting more. We have also shared underlying data with a couple of local authorities so that they can identify and review the cases where children had a lot of instability, in order to provide better support in future.

**We will continue to produce the Stability Index in 2019-20, including for the first time showing changes in social worker in all local authorities and focusing new analysis on the schools attended by children in care system; exploring why these children are less likely than others to attend good or outstanding schools.**

The Stability Index now provides data for the Department for Education's National Stability Forum for looked after children. We would like the Government to adopt the Index as an official statistic, and in the meantime will share LA-level figures with Ofsted. The CCO will be working with the Department for Education this year to encourage them to produce this data themselves in future.

**We will continue to attend regional children in care council meet-ups around the country** to learn directly from looked after children and ensure we can represent their interests to policymakers.

## Advisory Board

The Children's Commissioner's advisory board challenges and advises the office about its work. It meets six times a year. We recruit through open advertisement as positions fall vacant. The Advisory Board's current membership is:

- > Dr David Halpern
- > Sophie Humphreys OBE
- > Josh MacAlister
- > Alison O'Sullivan
- > Rt Hon Jacqui Smith
- > Edward Timpson CBE

## Budget

The Office of the Children's Commissioner budget is £2,484,000, amounting to 21 pence per child in England<sup>2</sup>.

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<sup>2</sup> *Indicative; subject to confirmation by Department for Education*

## United Nations Convention on the Rights of the Child

The work programme for 2019-20 relates to the following articles in the UNCRC

Piece of work	Article
We will work with children this year to understand better how they view the schools system, and what can be done to improve their experience of schooling without losing sight of the importance of a strong education. We will explore the use of internal exclusions and isolation booths.	3, 28, 29, 30, 31.
Our current work with a number of LAs to understand their funding pressures has highlighted that funding for targeted services to support families before they enter a downwards spiral has been decimated. As part of the manifesto for childhood we will examine these issues and propose how a society shaped around the needs of children should look.	3, 6, 18, 24, 26, 27.
Another theme which came out very strongly in our consultation with children is the lack of safe places for them. We will work with children to understand this phenomenon better and make proposals for creating safer streets.	3, 19, 31.
We will focus this year on the way children use and are used by the online gaming industry. We will conduct focus groups with children to find out how they use games, explore addictive and immersive technology, and highlight the grey areas between gaming and gambling.	3, 5, 12, 17, 19, 31, 36.
In 2018, we found that over 2 million children in England are living in families with substantial complex vulnerabilities and of these, 1.6 million have no established, recognised form of additional support. In our annual report to Parliament this summer we will have improved estimates and will produce reports for each local authority alongside. We will develop our webpages around the framework this year to enable members of the public, researchers, MPs, charities and local service commissioners and providers to see the level of childhood vulnerability in their local area.	3, 4, 6, 19, 20, 21, 22, 23, 24, 26, 27, 28, 34, 36, 42.
Having found particular gaps in knowledge about multiple forms of need, we will continue work to bring datasets together to understand how forms of vulnerability are inter-related. We will have a particular focus this year on children with uncertain nationality, where the picture is very unclear, and on adolescents living with multiple vulnerabilities.	3, 4, 6, 19, 20, 21, 22, 23, 24, 26, 27, 28, 34, 36.
Earlier this year we surveyed 11 local authorities to discover which schools in these areas remove children into home education and how often. We will repeat the survey with all local authorities in England and publish detailed results.	3, 18, 19, 23, 28, 29.
We will share the data we have collected on early help mental health support with Public Health England, NHS England and the Department for Education – the bodies who should be monitoring this provision – and work with them to encourage them to gather this information themselves in future. Until it is collected by central Government, we will continue to collect it ourselves, with a second data collection	3, 6, 24.

planned for 2020-21.	
As our 2018/19 Children’s Mental Health Briefing demonstrated, despite some improvements to CAMHS, on the ground progress remains frustratingly slow. To assess progress against the NHS’ stated targets and to enable proper scrutiny of local decisions, we will repeat our Mental Health Briefing in 2019/20 to see whether local areas that performed poorly have improved.	3, 6, 23, 24.
We are working closely with 12 local authorities to understand how much they spend on different groups of vulnerable children. We will use our analysis to inform the Government’s Spending Review, for the first time putting the needs of children at the heart of national decision-making around spend.	3, 4, 6, 19, 20, 21, 22, 23, 24, 26, 27, 28, 34, 36.
We are working with the Office of National Statistics, the Economic and Social Research Council and a consortium of universities, charities and What Works centres in a new partnership on data for and about children. We will improve data on vulnerability through linking and matching administrative data.	3, 4, 6, 19, 20, 21, 22, 23, 24, 26, 27, 28, 34, 36.
We will visit children in different types of closed residential setting across the board, highlight instances where children fall through the gaps in the current legal framework and where the system is opaque, and work with children to ensure their best interests and rights are respected when they are deprived of liberty for any reason.	3, 6, 12, 24, 25, 31, 37, 40.
We will publish in spring/summer 2019 a report examining the experiences of children with autism and learning disabilities stuck in inpatient mental health settings, exploring why so many of these children end up in hospital unnecessarily or struggle to get discharged home.	3, 6, 8, 9, 12, 23, 24, 25.
We will show, from information gathered by the office from NHS England, the extent of knowledge about the provision of in-patient mental health units for children, the demand for these units, and estimates of how long children spend in them. We will make a statutory request of NHS England that they gather this data themselves next year. We will continue this monitoring throughout 2019/20 and publish our findings at the end of the year.	3, 4, 6, 8, 9, 24.
We will continue our programme of visits to children in the criminal justice estate. Where possible we will continue to take influential policy-makers with us on these visits.	3, 6, 12, 19, 28, 31, 37, 40.
We will campaign for an end to segregation and isolation for nearly all children in the criminal justice estate, and for better, more caring provision to be made for those unable to manage on standard wings.	3, 6, 15, 23, 31, 37, 40.
We will continue to focus on resettlement provision for looked after children on release from custody. We will work with central Government to highlight where the current system lets down children or the public, wastes taxpayers’ money and perpetuates a cycle of personal and social failure and wasted opportunities and costs.	3, 4, 20, 27, 40.
We will continue to run the Help at Hand service to ensure that more children and young people can get the help and advice they need.	3, 9, 12, 13, 17, 20, 25, 42.
We will publish a report on the provision of advocacy for children in care, building on our experience through Help at Hand.	3, 9, 12, 17, 20, 25, 42.

<p>We will embed the Help at Hand service more intensively within the policy and communications activity of the Office and link it closely to our Evidence function, in order that it becomes the portal for further investigative and analytical work across the office. We will appoint an ‘investigative researcher’ on our policy and public affairs team to scrutinise in more detail those issues raised with Help at Hand.</p>	<p>3, 4, 12, 13.</p>
<p>We will use our digital platform for children in care, IMO (‘in my opinion’), to raise awareness of the rights of looked after children and call for further evidence from children where issues are being raised repeatedly with Help at Hand.</p>	<p>3, 9, 12, 13, 15, 17, 20, 42.</p>
<p>We will explore the potential for spinning off IMO into a social enterprise run by children in care and care leavers on a sustainable financial basis.</p>	<p>3, 9, 12, 13, 15, 17, 20, 42.</p>
<p>We will continue to produce the Stability Index in 2019-20, including for the first time showing changes in social worker in all local authorities and focusing new analysis on the schools attended by children in care system; exploring why these children are less likely than others to attend good or outstanding schools.</p>	<p>3, 8, 9, 20, 25, 28, 29, 39.</p>
<p>We will continue to attend regional children in care council meet-ups around the country to learn directly from looked after children and ensure we can represent their interests to policymakers.</p>	<p>3, 9, 12, 20, 42</p>



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