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Josh MacAlister MP
Minister for Children
Dept for Education

Sean Hayes
Chair of NAIRO

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14th October 2025.

Dear Josh MacAlister .

RE SUPPORTED ACCOMODATION :

I wrote to you on the 9th of September 2025 and the 6th of October 2025 to congratulate you and to offer best wishes on your appointment as Minister for Children and Families .Further ,to express our wish to collaborate with you and your officials for the benefit of children in care in this country. I write today in relation to the matter of Supported Accommodation.

This morning, I read the article in the Children and Young People Now, Publication entitled : " Children's minister urged to end 'care-less' housing for older looked-after children." CYP Now - Children's minister urged to end 'care-less' housing for older looked-after children :13th October 2025.

Within the most recent communication with you, I advised that NAIRO , in form of Trustee Ms Karen Mitchell and I recently meet with DfE official(s) on the 31st of July 2025 concerning the use of Supported Accommodation for Children in Care . In preparation for the meeting with the meeting with the DfE I undertook an internal Brief Research Review . I highlight below some of the information that was ascertained and hope that it may be of some use.

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The Information relates both to the provision of Supported Accommodation[1] generally[2] to Children who are looked after by Local Authorities . (UASChildren) are Looked After under S:20 of the Children Act 1989 and with reference to Government Policy regarding [3]Age Assessment, the Childs General [4]Human Rights, and the[5] Government Human Rights Review of Policy for Children in Care and [6]General Asylum Policy including interviews and Asylum Support and[7]General Housing Statistics concerning Children and Homelessness [8]Child Mortality and [9]Child Mortality in previous Unregulated Supported Accommodation.

[1] https://www.gov.uk/government/statistics/childrens-social-care-in-england-2024/main-findings-childrens-social-care-in-england-2024

[2] https://www.gov.uk/guidance/introduction-to-supported-accommodation

[3] https://assets.publishing.service.gov.uk/media/686250723e6b7941f4e00be7/Assessing+age.pdf

[4] https://www.legislation.gov.uk/ukpga/1998/42/schedule/1

[5] New inquiry: Human Rights of Children in the Social Care System in England - Committees - UK Parliament

[6] Asylum support: Overview - GOV.UK: https://www.gov.uk/asylum-support / Asylum Accommodation, Applications and Interviews – Home Office in the media. https://homeofficemedia.blog.gov.uk/2020/07/03/factsheet-asylum-accommodation-and-applications/

[7] England's Homeless Children: The crisis in temporary accommodation
https://publications.parliament.uk/pa/cm5901/cmselect/cmcomloc/338/report.html

[8] https://sharedhealthfoundation.org.uk/publications/child-mortality-in-temporary-accommodation-2025/

[9] https://www.bbc.co.uk/news/uk-england-lancashire-58512743

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The [10]Children's Rights Impact Assessment prepared to inform the Children's Wellbeing and School Bill highlighted that the Government wants to make the Care System more Child Centred. [11]The National Audit on Group -based Child Sexual Exploitation (Casey Review) found that, "Being in care almost fast-tracks children into adulthood – living in residential settings, or 'semi-independent housing' long before a child whose family is able to take care of them would do so."

The[12] Keep Caring to (18) Campaign produced a time line of what they articulate as being a time line showing how the Law and Government Policy relating to 16-17 years old went backwards from 2019 . An Impression is gained that , in terms of the perception in effect be a consequential lessening of the possibility the provision of fully Regulated Care for any Child who is 16-17. An impression is gained that Supported Accommodation is now often referred to, as being : 'Care Less Accommodation' is being used as default provision for 16-17-year-old Children who in effect will not have the opportunity to live within a Family or Residential Care.

According to [13]Article (39) the term Care Less is applied because the New statutory. standards from 2023 for supported accommodation deliberately omit any requirement to provide care to children who live there. While Children under 16 can no longer be placed in what was termed as Unregulated Supported Accommodation and Regulation has now been introduced to that applies to Supported Accommodation Providers who now have to register with Ofsted and meet certain standards, concerns remain that Children /Children who are in Care :16-17-year-olds can be placed in Supported Accommodation without a Care Requirements.

[10] https://article39.org.uk/campaigns/keepcaringto18/
https://my.microsoftpersonalcontent.com/personal/8f106ff9a3dc5c39/Documents/Documents/CWS_Bill_Childs_Rights_Impact_Assessment_as_amended_in_the_House_of_Commons.pdf

[11] https://www.gov.uk/government/publications/national-audit-on-group-based-child-sexual-exploitation-and-abuse

[12] https://article39.org.uk/campaigns/keepcaringto18/

[13] https://article39.org.uk/resources/resources-for-advocates/supported-accommodation//

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The Article (39)[14] Website advises that in 2023 ," Supported accommodation is now an official part of the children's care system in England," and that " most children in care in England live with foster carers (57,020 children on 31 March 2023; 68% of all children in care).

Further that , " nearly 1 in 10 lives in a children's home (7,780 children on 31 March 2023). " In both foster care and children's homes, children of all ages receive care and supervision within a homely environment." However, that " under new secondary legislation, bedsits, hostels, shared houses with adult strangers and even caravans can now be part of an Ofsted-registered 'supported accommodation service' for 16- and 17-year-olds who are in care, or who have left care."

Further that "official statistics show that 8,980 children were living in supported accommodation on 31 March 2023 (then unregulated and described as 'semi-independent living' and 'living independently') – 41% of 16- and 17-year-olds in care. "

However , in July 2025 as highlighted below the [15]Education Sub Committee has recently stated that all children in care must receive care where they live.

CHILD MORTALITY ASSOCIATED WITH HOUSING/ACCOMODATION CONDITIONS:

In general terms concerning the impact of Housing/Accommodation and Child Mortality it was deeply concerning to find that according to the [16]Shared Health Foundation :[17]New data uncovers that between 112023-2024 ,eighty (80)children died in temporary accommodation in one year.

More specifically in terms of the use of what was previously termed as Unregulated Supported Accommodation it was equally worrying to find that [18]At least 14 children in care have died while living in supported accommodation in England since April 2018, new data has shown.

[14] https://article39.org.uk/resources/resources-for-advocates/supported-accommodation/

[15] https://article39.org.uk/2025/07/10/parliaments-education-committee-says-all-children-in-care-must-receive-care-where-they-live/

[16] https://sharedhealthfoundation.org.uk/publications/child-mortality-in-temporary-accommodation-2025/

[17] https://www.ncmd.info/

[18] https://www.bbc.co.uk/news/uk-england-lancashire-58512743

The article advises that , " Children's rights group Article (39)[19] said the figure showed the "very desperate place right now in the care system". The article highlights that this comes as a ban on placing vulnerable children under 16 [20]in unregulated accommodation as introduced this week., (October ;2023) .Further that for example [21]Charlotte, from Morecambe, has warned of the dangers of putting young people in this type of home. She told BBC Newsnight she experienced it first hand and saw "16-year-olds go in completely fine [and] coming out with ketamine addictions". "Some of the stories, you'd be surprised, like girls doing sexual favours for drugs," she said."

In addition, there appears to be some general concern about the way Supported Accommodation is now being used for Children and would hope that more generally. these matters are additionally considered by the consultation taking place by the " Joint Committee on Human Rights [22]New inquiry: Human Rights of Children in the Social Care System in England - Committees - UK Parliament) that has launched an inquiry into the human rights of children in the social care system.

[19] https://www.bbc.co.uk/news/uk-england-lancashire-58512743

[20] https://www.gov.uk/government/news/unregulated-accommodation-banned-for-vulnerable-children-under-16

[21] https://www.bbc.co.uk/programmes/p09vks65

[22] https://committees.parliament.uk/committee/93/human-rights-joint-committee/news/208343/new-inquiry-human-rights-of-children-in-the-social-care-system-in-england/

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SOME ADDITIONAL POINTS RAISED:

(1) **That Supported Accommodation Policy/ Provision may be adversely impacting on a [23]Childs Human Rights :** To be cared for,protected,family life , from exploitation. In addition to the examples of concern cited , there is a general concern arising from the general vulnerability of Children in particular UASChildren who are sometimes [24]Trafficked may also be ,Criminally and or Sexually Exploited /Open to Exploitation Victims of Modern Slavery .

(2) **Qualifications and Experience of Staff :**While it would be unfair to generalise ,It was additionally pointed out that an impression is given that as there is an inherent absence of the requirement to provide 'Care' the Skill ,Experience and Qualification levels of staff in Supported Accommodation together with in frequent/inconsistent availability are likely to be insufficient.

(3) **The Commissioning and availability of Foster Care for UASChildren.** There appears to be some uncertainty about the availability of Foster Care generally and as a consequence more specifically to meet the needs of[25] UASChildren. While the Government within the [26] Children's School and Wellbeing is seeking to increase the numbers of Foster Placements available to Children , the apparent promotion of Supported Accommodation for 16–17-year olds may have the impact of excluding or reducing the possibility that any 16–17 year-old will have the opportunity to live within a family environment.

(4) **The Legal Status of UASChildren :**Section :20 Looked After as opposed to S:31 Care Order. A NAIRO member indicated that" I have long thought that it is wrong that so many unaccompanied children are in care under section 20 when there is no parent or anyone with parental responsibility around.

(5) **The General Safeguarding of Children placed in Supported Accommodation.** Concerns have been expressed that Children and Children in general who are already vulnerable are placed without sufficient care and safeguards within Supported Accommodation. However, it is noted that the Government produced

[23] https://www.legislation.gov.uk/ukpga/1998/42/schedule/1

[24] https://www.gov.uk/government/consultations/care-of-unaccompanied-and-trafficked-children

[25] https://www.thefosteringnetwork.org.uk/about-fostering/being-a-foster-carer/caring-for-a-child/fostering-unaccompanied-children-seeking-asylum-in-the-uk/

[26] https://bills.parliament.uk/bills/3909

a [27]Safeguarding Strategy Unaccompanied asylum seeking and refugee children :November 2017 and the[28] Safeguarding unaccompanied asylum seeking and refugee children policy document;2017.

Thank you ,

Yours sincerely

Sean Hayes. **Dip SW, MA (Ethic's), B Phil, BA (Hon's), Cert CY, Dip SW, PQSWA, PQCCA, DSW, Cert., C-M**.

Chair of NAIRO on behalf of the NAIRO Team:

[27]Safeguarding Strategy Unaccompanied asylum seeking and refugee children November. 2017:https://stackmail.com/?_task=mail&_action=get&_mbox=INBOX&_uid=636&_token=z86OG0UCkhT5dFOygARYbTztLm7jZMxX&_part=2

[28] https://www.gov.uk/government/publications/safeguarding-unaccompanied-asylum-seeking-and-refugee-children

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