Children in Care Placements - Commissioning and Sufficiency Strategy

A Strategic Approach to the Commissioning of Children in Care Placements

2018 - 2020

“Getting it right first time, on time, every time”
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1. Purpose

1.1 All local authorities have a statutory duty to ensure sufficient accommodation for its Looked After Children and Young People. This is referred to as the 'Sufficiency Duty' as laid down in Section 22G of the Children Act 1989. This duty should be undertaken within the context of the planning and co-operation duties which the 2004 Act places on partners in order to improve the wellbeing of the children in the local area.

1.2 This Strategy responds to the duty by formalising the approach in which Nottingham City Council (NCC) commissions Children in Care (CiC) placements, informed by current and anticipated sufficiency requirements. The Strategy lays out the City’s vision and commitment to all children and young people requiring a care placement and details the minimum standards and commissioning plans for the placement market.

1.3 The Strategy for 2018-2020 details key developments as well as market changes and drivers over the previous two year period, including current market gaps and opportunities. Recommendations for priority work streams and the implementation plan will be led by the Council's Children's Integrated Services Directorate, supported by the Strategy & Resources Directorate.

2. Background

2.1 Nottingham is a vibrant City with a diverse population. It is a city of business and enterprise, learning and science, sport and culture. Nottingham, like other cities, still faces challenges. Socio-economic factors such as high levels of deprivation; unemployment, domestic abuse, alcohol and substance misuse, all impact on the volume and complexity of needs presented by children and young people. Nottingham’s Children in Care (CiC) population remains higher than the national average, but is comparable to the average of its statistical neighbours.

2.2 Like other local authorities, one of the greatest challenges for the City is improving outcomes for the small cohort of the most highly complex children and young people, who often have multiple needs and display highly challenging behaviours which lead to placement instability and escalating care needs. Radically rethinking the way in which these young people are placed and cared for, to achieve stability and improved outcomes, is a priority for Nottingham City.

2.3 Changes in the volume and type of placement demand, combined with financial pressures, legislative changes and learning from serious case reviews, have all impacted upon local sufficiency requirements. Nottingham City remains agile in its response to these challenges. The City's Placement Service has dedicated capacity to implement robust market development, contracting and quality assurance processes.

2.4 The level of demand, locally, regionally and nationally - particularly for fostering placements - is such that often we find providers of fostering and residential provision are able to be extremely selective in which children and young people they accept, and are able to set prices reflective of demand and market forces rather than individual need. In response to the availability of good placements we are pursuing in this strategy some different approaches to the market in order to ensure sufficiency and support our goal of 'getting it right first time, on time, every time'.
3. Vision and Commitment

3.1 In line with the Nottingham City Council Plan and the Children and Young People’s Plan, the overarching ambition of this Strategy is to ensure that all children and young people are given the best start in life and have the opportunity to thrive and achieve.

The Vision - Getting it right first time, on time, every time

Nottingham City Council will provide every child and young person with the best possible placement, which meets their needs, wishes and feelings and provides them with the opportunity to thrive and achieve.

Nottingham City Council will drive a dynamic, outcomes-focused, child-centred placement market, which offers good value, quality and choice, to ensure that the right placement is found the first time, on time, every time.

The Commitment

For all of our children and young people, Nottingham City Council commits to:

✓ Listen to children and young people and maximise opportunities for their feedback to inform and influence service delivery.

✓ Measure children and young people’s outcomes across all placements, ensuring an understanding of what does and does not work and acknowledging when something needs to change.

✓ Secure the best possible placement for every child and young person, in an open market, with consistent application of processes across internal and external provision.

✓ Place a minimum of 85% of all children and young people ‘locally’, i.e. within 20 miles of the centre of Nottingham. For those placements made outside of the local area, Nottingham City Council will ensure that the same levels of monitoring and quality standards are applied.

✓ Provide consistency in the quality, support and entitlements offered to children and young people within all placement provision, through standardised specifications, contracts and requirements.

✓ Articulate to providers what excellent outcomes look like for each child and young person and be open to exploring incentives for over-achievement.

✓ Implement effective early intervention, for example:
  o Financial commitment where a specialist/therapeutic placement is required, for a period of time determined by a qualified professional
  o Escalate and recommend change when a young person has experienced multiple placement breakdowns

✓ Implement robust commissioning, contract and quality assurance processes.
4. Key Sufficiency Messages

Strengths and Opportunities

- Effective provider, local authority and partner relations, enabling continued market development, influence and management.
- Partnership approach to recruiting local families to foster working closely with faith communities, schools, police, early years and moving into health communities.
- Regional opportunities for creative, radical redesign of solutions for the most complex placement requirements – e.g. the development of a local area Social Impact Bond in partnership with Derby City and Nottinghamshire County, to deliver four distinct interventions across the spectrum from Edge of Care to Residential Step-Down and to include supporting foster placements to ensure as many children as possible live in a family setting.
- Exploration of more creative and effective commissioning arrangements regionally and/or sub-regionally (D2N2 area) as the current East Midlands Regional Provider Framework (2016 – 2020) comes to an end.
- Increased local placements and maximised value for money achieved through the further development of a long term residential block contract.
- Assured quality and consistency in the support provision for young people placed in external semi-independent accommodation through the implementation of a new contracting approach and quality standards.
- Comprehensive quality assurance processes.
- Robust contract management processes.
- Capacity to scrutinise value for money and budget management (including Health contributions).
- Opportunities to maximise the effectiveness and appropriate matching within internal provision.
- Increased capacity in internal Semi-Independence provision.
- Continue to support and expand local Staying Put arrangements
- Close partnership working between Health, Education and Social Care to promote opportunities to achieve the best possible outcomes for young people.
- Development of extensive Edge of Care support through Targeted Support Team (TST), Multi Systemic Therapy Team (MST) and MST Child Abuse and Neglect (MST CAN) and Edge of Care Hub which are identifying and supporting families as an alternative to care.
- Continue to build on the success of placements commissioned to meet specific needs around CSE, sexually harmful behaviour, however this remains an area in need of greater capacity to meet demand locally and regionally.

Areas for Development

- Increased availability across placement provision to increase choice, particularly for local complex fostering and residential provision and for all emergency provision – within the internal services offer and the external market.
• Further expanding the opportunities to meet and effectively de-escalate the needs of the most complex children and young people – with a focus on areas of need associated with high risk such as CSE, criminal exploitation, offending behaviour / remand placements.
• Developing new approaches to Semi-Independent provision (e.g. supported lodgings)

5. Commissioning Direction

Approach

5.1 To ensure choice and diversity NCC will continue to operate within a mixed economy of internal and external provision, commissioned through an appropriate range of mechanisms which are being developed to incentivise the achievement of specific outcomes wherever possible. This will include frameworks, block contracts, spot purchasing, and the use of a Social Impact Bond which brings investor financing alongside grant funding from the Life Chances Fund.

5.2 In respect of internal services our focus will be to continue to develop new and innovative approaches to the recruitment of foster carers, and to carry out targeted recruitment of carers to meet specific needs represented within our CiC cohort. We are also actively developing our internal residential offer with a new 2-bed children’s home developed over the last year and further developments planned over the next two years.

5.3 These commissioning approaches will be implemented as an individual Authority, and in regional and sub-regional partnerships, where we will seek to address common needs and challenges. All commissioning will be strategic and needs-led, with robust procurement and contracting functions embedded. Collaboration between partners, commissioners, the market and children and young people, will promote a market which is truly fit for purpose.

5.4 Placements will be made according to what placement can best meet the needs of the child or young person. To ensure this, there will be a consistent application of processes across internal and external provision. Where we are able to meet the needs of a child through an internal placement this would always be our preferred option as it allows us to offer fully joined up services. Work is constantly undertaken to maximise value for money. Whilst this continues to be required, the priority remains to drive up quality and ensure early intervention leading to de-escalation of need and greater placement stability for better outcomes for our children and young people. Key to these strands of work is that we recognise that the more we achieve in terms of placement stability and improved outcomes for our children and young people, the greater our influence is on costs and value for money – partnerships and collaboration with providers is key to achieving both aims.

5.5 We work with Independent Reviewing Officers and Social Workers to understand the individual needs, wishes and feelings of children and young people for each individual placement search. We also work directly with the Children In Care and Care Leavers Councils when undertaking commissioning or development activity to ensure their views are central to decision making.
Regional Collaboration

5.6 NCC will continue to build upon strategic relationships with regional local authorities to achieve greater regional and sub-regional collaboration and identify future areas for tactical commissioning. Work to further integrate Health, Education and Social Care through joint planning and funding will sustain shared accountability and inter-agency cooperation, drive efficiencies and prevent duplication.

5.7 Through established East Midlands regional forums, NCC are encouraging creative discussion around radical approaches to meeting the placement needs of the most complex children and young people. Across the region, local authorities deploy significant resources on placements for a small number of the most complex children and young people. NCC will support the development of new approaches to better meet need and improve outcomes for this cohort.

5.8 To this end a strong commissioning and operational partnership has been developed with Nottinghamshire County and Derby City colleagues over the last two years, resulting in the development of a Social Impact Bond. This outcomes based contract is being established to operate across the three authority areas to support de-escalation from residential care, support foster placements at risk of breakdown (particularly where escalation to residential settings is likely), reunify children in care with primary carers / birth family, and provide Edge of Care services.

5.9 Further work is underway to strengthen and expand on this sub-regional partnership, exploring the potential of more joint commissioning approaches with the local market of fostering, residential and semi-independent provision, across the D2N2 area. The local market will be consulted on different approaches to commissioning and contracting, for example to provide more specialist foster placements locally, to better meet the needs of our children and young people, and to improve quality, sufficiency and value for money.

5.10 Within the same sub-regional D2N2 geography, the four Local Authorities continue to develop plans to create a Regional Adoption Agency, to improve efficiency and efficacy in our adoption work whilst seeking best value in the delivery of our statutory duties in relation to adoption.

Local Placements for Local Children

5.11 Nottingham defines a 'local' placement as anywhere within a 20 mile radius from Nottingham City Centre. Where appropriate, the aim is for children and young people to remain living locally, taking into consideration maintaining a young person’s educational, health, social and cultural connections and access to resources. The ambition is for 85% of all CiC to be placed locally. The current proportion is 83.2% (average over Q1 2018).

5.12 NCC continues to work collaboratively with the provider market and with regional local authorities to ensure that the use of local placements for local children and young people is maximised. Small scale block contracting has increased local placement capacity, whilst broader market development will improve co-ordination, provision of more specialist foster care, and advanced placement planning. Where it is not possible to secure a local placement, the remaining matching criteria for a young person will be prioritised and the local authority will evidence that it has done all that is reasonably practicable to secure a suitable placement.
6. Market Position and Sufficiency

Market Development Approach

6.1 To effectively shape the market, NCC will maintain a strong visible presence and consult directly with the market, articulating a clear direction for what is required internally and externally to best meet the needs of our children and young people. We believe that the market should be;
- Composed of a mix of small, medium and large organisations from the public, private, voluntary and not for profit sectors, to achieve variety, sustainability and avoid monopolies
- Dynamic, flexible and responsive - proactively adapting to changing demand and need
- Person-centred and outcomes-focused
- Efficient, effective and value for money

6.2 The development of such a market locally / regionally requires close partnership working with neighbouring authorities to present a viable proposition to providers in the area. This collaboration has to date been undertaken on an East Midlands regional basis and is now being explored at a sub-regional level with the aim of creating, developing and sustaining more specific local commissioner-provider partnerships that are better equipped to meet need and demand.

Internal Provision

6.3 NCC is committed to maximising the effectiveness of internal provision and securing the best possible placement for every child and young person, in an open market, with consistent application of processes and standards across internal and external provision.

Internal Placement Provision

- Fostering (254)
- Settled Residential (15)
- Short Term Residential (4)
- Disability Residential (11)
- Semi Independent (21)

All figures denote capacity (beds)

6.4 Fostering
At 31.08.2018, 47% of fostered young people were placed with internal foster carers. Whilst the proportion of young people placed with internal foster carers fluctuates over time, this is the highest proportion to be placed with the internal fostering service over the last 18 months; and the trajectory over the last 6 months has been one of increasing or maintaining internal foster placement
numbers whilst reducing the number of foster placements made with external providers. NCC has pledged to continue the drive to increase the capacity of the internal fostering service over the next two years. It is anticipated that this will enable more children to be placed locally, reduce external spend and achieve improved placement management throughout a child's journey through care, ultimately leading to overall improved outcomes.

6.5 It is acknowledged that growing the internal fostering service will be challenging and will take time. The priority will always be making the right match and therefore we will always need external commissioning arrangements. We therefore continue to engage the local IFA market to explore alternative commissioning approaches that enable providers to better meet demand.

6.6 **Residential**
NCC has 19 residential care home placements across 6 small group homes, including one newly developed 2-bedded unit, and also one specialist long-term unit for children with disabilities. The homes provide high quality consistent care and are rated by Ofsted as either Good or Outstanding – except the short term residential unit currently has an Ofsted grade of Requires Improvement. The new 2-bed provision has been developed in response to the difficulties in securing appropriate residential placements in the external market. Furthermore, the strategic aim of this investment is to help NCC to keep its more complex young people closest to the City and the network of care and support services that can be marshalled around those individuals when their placement remains local to the authority.

6.7 **Semi Independent**
NCC has 21 semi-independent placements across five houses. These well-established provisions offer consistent, high quality, flexible accommodation and support for those young people embarking upon their journey to full independence. New approaches and options are regularly considered and a plan is being developed to implement a supported lodgings option during the period covered by this strategy.

### Internal Governance

In addition to the Looked After Child planning and review process, NCC have a number of decision making forums which review the quality and appropriateness of placements, and ultimately impact upon placement demand

**Edge of Care Panel**
The Edge of Care Panel ensures a robust process for determining the threshold for children being accommodated. Through a menu of alternative interventions, such as Multi Systemic Therapy and wrap around support in the home, the Edge of Care Panel is able to prevent inappropriate admissions and facilitate timely rehabilitation where this meets the needs of the child.

**Placements Panel**
The Placements Panel meet weekly to review placement progress, ensure value for money and to consider requests for placement package variations. Membership spans a broad range of professions, including social care, education and CAMHS - all of whom contribute to determining whether or not each placement is meeting the child or young person’s needs.
6.8 The external market meets a significant proportion of the City's CIC placement needs, through framework, block contracting and spot purchasing arrangements. Despite the intention to maximise internal provision, it is acknowledged that there is an ongoing need to commission from the external market. The Placement Service undertakes effective, consistent procurement, contract management and quality assurance of all external placements.

**External Provision**

**External Placement Provision**

- East Midlands Regional Children's Framework
  - Fostering (228)
  - Residential Block Contract (12)
  - Residential (34)

**Accredited Provision:**

- Semi Independent (35)

**Spot Purchase:**

- Residential (13)
- Fostering (18)

6.9 **East Midlands Regional Children’s Framework**

The East Midlands Regional Children’s Framework was implemented in February 2016 and runs to 2020. The Framework provides a formalised agreement between participating local authorities and independent providers of fostering and residential placement provision. The Framework has brought about benefits including; efficiencies, shared risk, buying power, market influence and information and resource sharing. A review has been undertaken to inform a decision on the future commissioning arrangements from 2020, the options from this were broadly to continue with a regional approach or to commission on a sub-regional basis with partners across the D2N2 geography. It has recently been agreed that the latter option is the preferred approach and consultation with the local market is being planned.

6.10 The current framework supports NCC to;

- Maintain a diverse, healthy and competitive market by enabling new providers to join the Framework annually throughout the life of the contract.
- Achieve efficiencies through streamlined processes and coordinated contract management and performance monitoring.
- Enable further targeted commissioning through a mini competition process, omitting the need to undertake further lengthy and resource heavy procurement exercises.
6.11 Residential Block Contract

As an identified commissioning priority, in April 2015, NCC implemented a long term block contract for ten residential placements with one external provider. Since implementation and following the move to full usage, the contract has demonstrated a shared approach to ensuring good outcomes, increased local provision, greater placement stability and value for money. The contract to date has supported the achievement of:

- An increased percentage of children and young people placed locally.
- A significant reduction in local authority spend on residential care (alongside improved budget management and forecasting).
- Efficiencies via reduced staff time and travel expenses (e.g. social care and quality assurance visits).
- Efficiencies via reduced need to commission out of area services (e.g. CAMHS, education).
- Greater forward planning for the local authority and provider, leading to improved outcomes and placement stability.
- Greater consistency of service delivered.
- A close and collaborative working relationship with a residential provider that now has a significant local presence.

6.12 Fostering

The immediate priority will be to secure greater local sufficiency of foster placements for CiC presenting with highly complex needs, or for sibling groups, to reduce unnecessary disruptions and increase the chance of placement stability and improved outcomes for this cohort. Furthermore, the work to address sufficiency locally for this cohort has a clear aim of avoiding escalation to residential care on the basis of lack of fostering capacity rather than due to children and young people’s specific needs.

Directly linked to the increased activity in recruiting foster carers is to ensure carers are well trained and supported to consistently meet the needs of the children placed in their care.

6.13 Semi Independent Provision

Unlike fostering and residential provision, semi-independent provision is not regulated by Ofsted and there are very few barriers to new providers establishing themselves. This proves beneficial in terms of ensuring a diverse market which provides choice and encourages healthy competition - however it is also a risk in terms of quality and consistency of services provided.

6.14 In response to this, NCC has undertaken a programme of quality improvement work with local providers, setting new quality standards which include accreditation of properties by the East Midlands Decent and Safe Housing service which is hosted by Derby City Council. An open accreditation process allows providers to commit to NCC’s specified standards and helps to ensure that young people are offered consistent quality accommodation and support in their transition to independence. Provider success will be determined against the individual outcomes they are achieving for young people.

6.15 To further expand our offer, recognising that some young people do not want to ‘stay put’, we are increasing choices for young people with a plan being developed to deliver a supported lodgings option with the support of host families. These developments will produce a new family-based alternative to traditional Semi-Independent services.
6.16 **Spot Purchasing**
Spot purchased provision will be commissioned for services that are not available through internal provision or external regional and local contract arrangements and where there has been no previous or predicted demand e.g. parent and child assessments, rare/specific disability/health need. In the two years since the previous Commissioning & Sufficiency Strategy 2016-18, a specific contract has been developed for spot purchased placement services to ensure a robust legal position is maintained.

**Contract Management**

6.17 An Individual Placement Agreement (IPA) is issued for all commissioned placements and these form a contractual agreement between the local authority and the provider. The IPA provides detail on specific aspects of the placement, the expected objectives/outcomes, fees and consenting signatures from the local authority and the provider.

6.18 Meetings are held with all providers of commissioned placements a minimum of once every six months and consider the following areas: contract & compliance monitoring, performance management, business development; individual placements, feedback from social care, health, education, young people, opportunities for improvement/increased value for money and negotiations on the level of support being provided.

**Quality Assurance**

6.19 Through robust commissioning and quality assurance process, NCC ensures that all CiC are accessing well matched, high quality and value for money care placements. A system for monitoring providers, which takes into consideration performance, business viability, inspection judgements, history and complexity of current placements, determines the level and frequency of quality assurance visits. The visits are undertaken by the Placement Service’s Quality Assurance Officer and selected social care professionals. Placement feedback from Social Workers, Independent Reviewing Officers and children and young people is gathered to support quality assurance processes. Clear service protocols determine the required actions to be undertaken by NCC where quality concerns are identified.

6.20 It is Nottingham City Council's ambition to only place with Ofsted judged ‘Good’ and ‘Outstanding’ providers. However, the demand for both fostering and residential placements locally, regionally and nationally, combined with the type and level of young people's needs that are often evident when a placement is required at short notice, mean that we do have to consider offers from providers with lesser Ofsted judgments. The current position with the private market is one that allows providers to be very selective as demand for placements is high. It is therefore natural that such providers may shy away from more challenging or complex young people as they may be seen to pose a risk to a provider’s Ofsted grade. When NCC has to place a young person with a provider that has an Ofsted rating of less than ‘Good’ we ensure that our expectations for the service and what is required to meet the needs of the young person are very clear. When making such a placement NCC Placement Service ensures that robust quality assurance is carried out as soon as possible, and that the provider improves to a level of ‘good’ within a prompt timescale.
## Commissioning and Sufficiency Strategy – Recommendations

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| 1. | **Radical Redesign:**  
|    | • Collaborate with D2N2 LA partners to explore alternative commissioning approaches with the local market, to meet the placement needs of all children and Young people in the geographical area, including the most complex children and young people across the East Midlands / D2N2, and to ensure choice and value for money. New commissioning arrangements must be in place by March 2020 (at the close of the EMRCF). |
| 2. | **Market Development**  
|    | • Supporting complex and challenging children to remain in family settings, through the development and implementation of interventions via a Social Impact Bond and supported by the Life Chances Fund. Interventions to focus on de-escalation from residential care, foster placement support, family re-unification, edge of care preventative interventions. (2018/19)  
|    | • Work with local partners – Authorities and providers – to ensure a flexible and responsive approach to meeting demand for all categories of placement. (on-going)  
|    | • Develop a broader understanding of placement stability across residential and foster care placements to inform demand within the market and support the work in D2N2 / East Midlands under ‘Radical Redesign’. (2018/19) |
| 3. | **Semi Independent Living Services:**  
|    | • Quality assure and contract/performance manage the recently accredited Semi Independent providers to ensure they are adhering to our specified standards in accommodation and support and achieving positive transitions to adulthood for our young people (2018/19 - 2020)  
|    | • Review local market of provision to ensure sufficient capacity (2019/20) |
| 4. | **Residential Block Contract:**  
|    | • Continue to manage the current residential contract to ensure children and young people are placed in local provision that is of high quality and represents value for money (on-going)  
|    | • Consider additional developments within the contract to meet emerging needs as required. (on-going) |
| 5. | **Develop Nottingham City Council provision:**  
|    | • Increase the number of NCC foster carers including the use of targeted recruitment campaigns both in terms of target audience (e.g. schools, faith-based) and specifically recruiting carers with relevant backgrounds and a strong desire to care for more complex young people. (on-going)  
|    | • Review the effectiveness and value for money of the additional internal residential care for children and young people with complex needs – opened July 2018 – and consider further investment in additional units. (2019/20)  
|    | • Consider the development of additional internal Semi Independent units (2018/19 and on-going)  
|    | • Further development and expansion of Staying Put arrangements with internal foster carers. (on-going) |
- Develop Supported Lodgings (host families) model as a trial of this approach for specific cohorts 16 years plus as an alternative to Semi-Independent placements. (2019/20)
- Further development and implementation of the Regional Adoption Agency.

6. **Support children with complex health needs:**
   - Continue to work with partners in health to commission and fund appropriate placements for children in care who have complex health needs. (on-going)

7. **Ensure value for money:**
   - Regular review of high cost placements. (on-going)
   - Implementation of a systematic approach to negotiation of high cost placements – predominantly regarding residential provision. (2019/20 and on-going)
APPENDIX ONE

**Children in Care Population Analysis**

**Unaccompanied Asylum Seeking Children & Young People (UASC)**
Local Authorities have a duty of care to ensure the welfare needs of asylum seeking children and young people, under the age of 18 years, not living with their parents, relatives or guardians in the UK are met. Through 2016/17 and 2017/18 the number of UASCs in the care of NCC has increased.

Across 2017/18 there was an average figure of 28 UASC in placement in any month (lowest month 22, highest 32) and an average of 32 Asylum Seekers (Care Leavers) being supported by the Leaving Care Team, in any month (lowest month 25, highest 43). In regard to the number of Asylum Seekers being supported by the Leaving Care Team, this figure consistently increased through 2017/18 from 25 to 43.

By comparison, at the end of May 2016, there were 17 UASC in placement and supported by Nottingham City and 28 Asylum Seekers (Care Leavers) were being supported by the Leaving Care Team.

**Remand**
There has been an increase in the demand for remand placements resulting in 32 young people having 33 remand placements during 2017/18. In comparison 15 young people had 18 remand placements during 2015/16.

**Staying Put**
These arrangements allow young people aged eighteen and older who were previously looked after to remain living with their former foster carer/s (who may also remain a foster carer for younger children). In Nottingham in 2017/18 we had 22 young people in Staying Put arrangements with either private providers or internal (NCC) foster carers.

**Special Educational Needs (SEN)**
A number of children and young people who are looked after also have special educational needs and commissioning of an appropriate placement must take this into account to ensure their educational needs are met. The Virtual School, SEN Team and Placements Service work closely together to commission, fund and manage these placements.

Nottingham City has 45 children in care who have an Education Health Care Plan (EHC). In total there are 615 children of statutory school age living in Nottingham and who have an EHC plan. There are 60 children in care in Nottingham (for whom Nottingham City is the corporate parent) who receive SEN support. There is a total of 5427 children of statutory school age receiving SEN support in Nottingham.

The Virtual School is developing a system to record all details of those Nottingham City Children in Care who receive SEN support but are placed in other Local Authority areas.