TORBAY COUNCIL

Meeting: Children and Young People's Overview and Scrutiny Board Date: 27 March 2023

Wards affected: All

Report Title: Young People – Housing Strand Update

When does the decision need to be implemented? N/A

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1. Purpose of Report

1.1 This report has been prepared to provide members of the Children and Young People's Overview and Scrutiny Board with an update on the current situation and progress made regarding 16/17 year olds and care experienced young people and their accommodation needs.

2. Reason for Proposal and its Benefits

2.1 This report will provide an update on the current situation evidenced with a scoping exercised and summary of work and completed and actions being taken forward.

3. Recommendation(s) / Proposed Decision

3.1. That members of the Children and Young People's Overview and Scrutiny Sub-Board note the contents of the report.

Appendices

Appendix 1: MAIN REPORT

Background Documents

Supporting Information

Introduction
See main report
Options under consideration
See main report
Financial Opportunities and Implications
See main report
Legal Implications
See main report

- 5. Engagement and Consultation
- 5.1 N/A
- 6. Purchasing or Hiring of Goods and/or Services
- 6.1 N/A
- 7. Tackling Climate Change
- 7.1 N/A
- 8. Associated Risks
- 8.1 N/A

9. Equality Impacts - Identify the potential positive and negative impacts on specific groups

	Positive Impact	Negative Impact & Mitigating Actions	Neutral Impact
Older or younger people	Raises the profile of housing challenges for vulnerable young people across Torbay.		
People with caring Responsibilities			No differential impact
People with a disability	Raises the profile of housing challenges for vulnerable young people across Torbay (including those with mental and physical disabilities).		
Women or men	Raises the profile of housing challenges for vulnerable young people across Torbay (for males, females and gender neutral).		
People who are black or from a minority ethnic background (BME) (Please note Gypsies / Roma are within this community)	Raises the profile of housing challenges for vulnerable young people across Torbay (for all ethnicities).		
Religion or belief (including lack of belief)	Raises the profile of housing challenges for vulnerable young people across Torbay (for all religious beliefs).		
People who are lesbian, gay or bisexual	Raises the profile of housing challenges for vulnerable young people across Torbay (for young people of all gender orientation).		
People who are transgendered	Raises the profile of housing challenges for vulnerable young people		

	across Torbay (for all identities).	
People who are in a marriage or civil partnership		No differential impact
Women who are pregnant / on maternity leave	Raises the profile of housing challenges for vulnerable young people across Torbay (including young parents).	
Socio-economic impacts (Including impact on child poverty issues and deprivation)	Raises the profile of housing challenges for vulnerable young people across Torbay and the impact of poverty on them.	
Public Health impacts (How will your proposal impact on the general health of the population of Torbay)	Raises the profile of housing challenges for vulnerable young people across Torbay – stable housing invariably results in positive health.	

10. Cumulative Council Impact

10.1 See main report

11. Cumulative Community Impacts

11.1 See main report

APPENDIX 1 – Main Report

Context

Torbay is the corporate parent to our cohort of cared for children, from 0-18, and is also the corporate parent to all care experienced young people from the ages of 16-25, under the extended duties. As of the 15^{th} March 2022, the care experienced team is supporting a total of 246 young people between the ages of 16 and 25 (up from 177 in April 2022). Of this group 168 are 18 - 25 care experienced young people. This demonstrates a potentially significant amount of need in the immediacy as the services across children's services, adult services, and wider housing services, will need to work together to ensure the requirements of this cohort are met in relation to their accommodation needs. During the 2022 Ofsted inspection, the challenges faced by Torbay with regards to the lack of accommodation provsion and affordability were noted, however there was a clear direction from the regulators that accommodation for care experienced young people must be a corporate and strategic priority for Torbay, in recognition of those challenges.

Why is accommodation and housing so important?

Safe, sustainable and appropriate accommodation and housing for anyone is considered, in line with Maslow's hierarchy of needs (1943, 1954), as the very basic of needs; it fits within the foundation of physiological need which is required to then meet needs such as safety, belonging and love, esteem and self-actualisation. Having a safe base to call home is vital to achieving a sense of security and containment, which then allows for other identified needs to be met. This is particularly important for care experienced young people, whose early life experiences may have featured chronic insecurity and instability for periods of time. Only when permanent individuals have safe permanent accommodation can we expect them to have a sense of connection to their community and take ownership of their surroundings.

A lack of secure and affordable housing also places young people at a disadvantage with work opportunities as well as resulting in potential deprivation issues. For example, getting a bank account without a permanent address can be a challenge for young people but obtaining housing and other benefits without a bank account is also a challenge which perpetuates a circle that is hard to break. Often this can lead to young people becoming street homeless and creating an accommodation track record that is not attractive to both landlords and employers.

Types of accommodation used by care experienced young people post-eighteen

Our current care experienced cohort live in a range of arrangements and settings:

1. Independent living either through social housing or private rental sector.

This is often the preference for many care experienced young people, either at the age of eighteen or shortly thereafter. However, this comes with significant challenges currently. In conjunction with our semi-independent providers, the following barriers to accessing these options for care experienced young people were identified:

- Lack of overall housing availability and affordability. Finding affordable accommodation
 in the private rented sector is a challenge and has been exasperated by the current housing
 crisis and is by far the most common feedback from our care experienced young people.
 Due to the level of social housing in Torbay and availability of accommodation (approx. 220
 properties advertised through Devon Home Choices per year) available this is not a realist
 option, due to the lack of supply.
- **Devon Home Choice** Cases go to a panel meeting and if appropriate are B banded. This process has been streamlined to avoid any delays and therefore not disadvantage any

decision. However, availability of accommodation is limited and therefore not a realistic option.

- **Transition Planning** The lack of proactive action which can be taken prior to a young person's eighteenth birthday.
- **Suitability of accommodation** Issues relating to accommodation suitability i.e. size, condition, type.
- Landlords Resistance from landlords to rent to tenants in receipt of Housing Benefit or under 25s due to supply and demand and financial viability. A guarantor scheme is being explored to Children Services to help mitigate the risk.

2. Semi-independent transitional accommodation or supported lodgings

In recognition of the pressure points with regards to accommodation that can happen at the 'cliff edge' of eighteen, a tender and procurement process was initiated in 2021, with block contracts awarded on the 1 April 2021 as outlined below.

• Lot One: Supported Lodgings: for young people aged 16 -21 who are cared for children and/or care experienced young people to 25 if eligible and for homeless or at risk of homeless young people aged 16 – 25.

Awarded provider: Young Devon: This was originally a contract consisting of 24 units (5 of which are for 'enhanced support needs). However, due to a shift in young people's needs coupled with Young Devon struggling to recruit hosts, a new contract has been agreed based on a 16 bed model, 3 tier model: 5 standard, 6 semi-enhanced and 5 enhance,

• Lot 2 A: Multi-occupancy units for cared for children and/or care experienced young people with more complex needs aged 16-18.

Awarded Providers: Young Devon: 6 units (Grosvenor Road) and Livewest: 3 units.

• Lot 2 B: Multi-occupancy Units for cared for children and/or care experienced young people as part of a stepdown from care and/or step-down from more intensive post 16 accommodation provision and for other Young People (16-25) homeless or at risk of becoming homeless.

Awarded Provider - Livewest: 20 units.

• Lot 3: Semi-independent Accommodation and Support for Young Parents who are aged 16-24 years old.

Awarded provider: Westward Housing: 12 units.

Apart from Livewest Lot 2 A units, the other units were not vacant units on 1st April 2021 as young people were currently living in these provisions. These block contracts are not same day emergency accommodation or a permanent accommodation provision. The maximum length of stay for Supported Lodgings and Lot Two should be no longer two years and if over one year stay, this should be for evidenced based reasons.

Through-put and planning move-on at the right time is key to ensuring the most efficient and effective use of these provisions. What has been acknowledged however is that, should there be a lack of move on accommodation available, this has a range of adverse consequences for young people.

Should young people remain in transitional accommodation for long periods of time, there is the risk that this cohort of young people become the "hidden homeless": whilst not considered homeless, they do not have a forever, permanent home. Many of them can become literally and psychologically stuck and can regress in terms of their ability to be independent when we cannot

act when they are assessed as ready to move to greater independence. These young people do not have a Personal Housing Plan or a specialist Housing Officer to assist them in their next steps. In addition, this can cause placement sufficiency challenges for cared for and care experienced young people who may need this accommodation in the future.

3. Adult social care or adult mental health placement or provision

This would only be the case should a young person meet Care Act eligibility or eligibility for support through mental health services and assessment determines that a placement or provision as an adult is proportionate and in line with assessed need. In certain circumstances, a placement or provision may be joint funded by Children's Services and adult social care, often with the split in cost being accommodation provided by Children's Services (if this cost cannot be met by the young person) and support provided by adult social care.

4. With parents and relatives

This is often an arrangement made directly between the young person and their family. This option for care experienced young people can carry fragility, especially when we consider that care experienced young people may be more likely to experience relational difficulties in terms of their family relationships. Should arrangements such as this break down, and quickly, this escalates the risk of temporary accommodation or other hotel or bed and breakfast accommodation being the only option to consider in the short term.

Despite the risks for care experienced young people, this is the preferred option for 16/17 year olds and a great deal of preventative work has been developed to support 16/17 year olds to remain with their families. The use of Family Group Conferencing more effectively is supporting this work.

5. Staying Put

The term "Staying Put" is used to define the following arrangements where:

- a. A young person who was cared for immediately prior to their eighteenth birthday (as an eligible child) continues to reside with their former foster carer/s;
- b. The carer/s were acting as foster carers to the child immediately prior to the young person's eighteenth birthday (that is, the carers were approved as foster carers in accordance with the Fostering Service (England) Regulations 2011 and the child had been placed with them by the local authority, or via an Independent Fostering Agency);
- c. A young person is deemed an eligible child, within the meaning of paragraph 19B(2) of Schedule 2 to the Children Act 1989, immediately before he/she reached eighteen;
- d. The "Staying Put" arrangement is set out in the child/young person's Pathway Plan;
- e. A proportion of the allowance paid to the "Staying Put" carer/s is paid by the Local Authority Children's Services under section 23C of the Children Act 1989;

The "Staying Put" arrangement extends until:

- the young person first leaves the "Staying Put" arrangement;
- or the young person reaches their twenty-first birthday, if continuously, and still living in the arrangement;
- or the young person completes the agreed programme of education or training being undertaken on their twenty-first birthday, if continuously living in the arrangement since their eighteenth birthday.

As such, what is important to note, is that whilst some Staying Put arrangements may convert into private arrangements between the care experienced young people and their Staying Put hosts at twenty-one, this will not always be the case and accommodation will be required for those whose arrangement comes to an end. This poses similar challenges in respect of independent living options and move-on accommodation as outlined above. Similarly, there is always a risk that a Staying Put arrangement may break down, and that the young person affected will require accommodation urgently.

6. Hospital

A small number of care experienced young people may find themselves in hospital; intensive planning is therefore required from the point of admission, to ensure that appropriate accommodation which meets the young person's health needs is identified and available at the point of discharge.

7. Custody

A small number of young people may be in custody as care experienced young people, for varying periods of time. The local authority has a responsibility and a duty to provide enhanced support for these young people, both during and after their custody period ends, including working with other professionals to source appropriate accommodation or housing post-release. This can be particularly complex for example when taking into account conditions of release or any identified risks. Again, when considering independent living options post-release, the same challenges are faced as outlined above.

8. Emergency or temporary accommodation

This option for care experienced young people is avoided wherever possible. All care experienced young people at risk of becoming or experiencing homeless are tracked and monitored through the Youth Homeless Prevention Panel and are referred at the earliest point of identification to ensure that preventative work is undertaken to support the young person in securing a more sustainable and suitable accommodation option.

We always look to secure alternative options to emergency or temporary accommodation through:

- The use of FGC to explore potential family accommodation options.
- Exploration of transitional, semi-independent options on our block contract.
- Consideration of short term agreement to higher cost semi-independent provisions, should there be no option through the block contract.
- Liaison with adult social care in regard to any other accommodation types that could be utilised.
- The short term use of Nightstop.
- Using the Building Better Future team to support 16/17 year olds at home.

However, these options can quickly be exhausted and temporary or emergency accommodation then becomes the only avenue by which to secure a place for the young person to stay I the short term.

9. Homeless/no fixed abode

As above, this is avoided wherever possible. However, there are situations whereby young people may choose to stay with friends, or sofa surf, and unless they lack capacity under the Mental Capacity Act or there are significant adult safeguarding concerns, this has to be supported as the decision of the young person, regardless of the professional view about the suitability of this. That

said, significant attempts will then be made to secure alternative accommodation options for that young person.

Demand and management of Demand over the last 12 months

It is difficult to make comparisons with demand for housing for the 18 – 25 year old care experienced cohort with previous years for a number of reasons, the main one being duty to refers (DTR) when a young person is at risk of homelessness in the following 56 days not being consistently submitted up until the last 12 months. This matter has now been remedied with staff training and rigorous management and Youth Homeless Prevention and Resource Allocation oversight. Nevertheless, the last 12 months data is reliable and demonstrates the challenges for 18 to 25 year old care leavers in Torbay with 233 homeless applications being made by this group between 28.02.22 and 08.02.23. Supporting and managing the risks around this group of young people as well as 16 and 17 year olds who are at risk of homelessness has been a priority for Children's Social Care over the last 18 months. Progress has been made in this area and is evidenced in the fact that there are currently 21 young people on the risk of homelessness tracker compared to 38 at a similar time last year.

What has been done already?

In recognition of the housing challenges, Torbay have already:

- **Introduced of a Transitions Panel**, which tracks planning for all cared for and children with disabilities from fourteen to eighteen and identifies placement or post-eighteen challenges much earlier in the young person's care experience.
- **Regularly used Access to Resources Panel** to secure six months' rent and deposit for care experienced young people, to overcome guarantor barrier.
- **Tracked and monitored all unregulated placements** through the Independent Placement Overview Panel.
- Created and approved the **Preparation for Independence Strategy** which is now operational.
- Recruited a **Placement Auditor** who is working intensively with providers in respect of intervention provided to young people to prepare them for transition and independence, including tenancy management.
- Established a **Young Researchers group** through South Devon College who are focused on preparation for independence, in conjunction with an ongoing task and finish group.
- Met with the founder of the **Guarantor Scheme** with a Torbay model being drafted.
- Established a sixteen plus provider forum.
- Recruited to the DfE funded **homelessness prevention Personal Advisors** roles who works very closely with both the care experienced Personal Advisors and the Housing Officers to find creative solutions to risk of homelessness situations.
- Revised and approved the joint protocol in respect of youth homelessness.
- Established a **Youth Homelessness Prevention Tracker**, tracking final destination of each young person.
- Youth Homeless Prevention workers are taking up prevention duties much earlier and, where safe to do so, will work with wider Early Help services (such as FGC and Make Amends) and other agencies to support 16 and 17 year olds to remain at home with their family. Early identification has been further helped by work the Youth Homeless Prevention Workers have been doing with other agencies such as South Devon College whereby they have been delivering staff training so the signs and symptoms of youth homelessness are identified early so that preventative work can be delivered as opposed to waiting for escalation into a responsive position.

- A skills for life programme has been developed by the Youth Homeless Prevention Workers. This programme builds on other work to help develop young peoples' skills and knowledge in order to reduce the risk of repeat episodes of homelessness.
- **Night Stop** are now well established in Torbay as a service delivered by the YMCA. Night Stop provide valuable emergency temporary accommodation for young people between the ages of 16 and 25 typically between 1 and 3 nights. The work that Night Stop undertakes has proved extremely valuable for a number of reasons. Firstly, it allows time for risk assessments and referral work to be completed to support young people into the commissioned accommodation. Secondly, it allows some respite for parents and young people whilst mediation work is completed to get them back home.

What needs to happen now?

There is an urgent need to create housing stock which provides independent living options and move-on accommodation options for our care experienced young people. A scoping exercise has been undertaken, taking into account the number of properties which have been and will be required for care experienced young people year on year. This scoping exercise uses our current demographic in terms of cared for and care experienced young people and would is based on what is known currently in respect of mandated numbers of allocations for Torbay in respect of Unaccompanied Asylum Seeking Children.

	No. of cared for that were turning 18	Those care experienced young people who remained staying put at 18	Total of staying Put through the year	Those care experienced young people that remained in a supported Lodgings post 18	16+ cared for spend on accommodation	18+ Spend on accommodation/Lodgings	
19- 20	37	12	16	14	£2,888,468	£	399,218
20- 21	35	9	20	22	£ 2,050,501	£	648,876
21- 22	41	10	29	26	£1,582,320	£	356,465
		Projected		New Projected			
22- 23	32	11	36	10	£ 2,600,000	£	750,000
23- 24	28	21	40	12	£3,000,000	£	800,000
24- 25	28	28	56	15	£ 3,500,000	£	1,000,000
	UASC						
21- 22	2	0	0	2	£82,215	£	11,250
22- 23	7	2	2	7	£192,920	£	85,680

As a result of this scoping exercise, we have been able to project on the basis of young people's dates of birth (in terms of accommodation needs at the point of turning eighteen), and projected end dates in relation to semi-independent transitional accommodation and Staying Put

arrangements the accommodation need for care experienced young people per quarter over the next three years.

Year	Q1 (April, May, June)	Q2 (July, August, September)	Q3 (October, November, December)	Q4 (January, February, March)	Total
22-23	24	19	20	26	89
23-24	31	27	22	21	101
24-25	28	41	32	26	127

A new housing strategy that will be presented to Council on 29 March for approval, postponed from 7 March. A copy of the papers can be viewed on the following link. <u>Agenda for Council on Tuesday, 7 March 2023, 5.30 pm (torbay.gov.uk)</u>. This makes reference to the importance of accommodation for Care Experienced young people. The strategy draws upon the evidence base and assessment of need in Torbay.

A project plan is in place to deliver the strategy. Project 1.2 under Improving Housing Supply has been included: Provide a flexible approach to allow access to a mix economy of 101 units of varying types of accommodation, to improve the housing outcomes for care experienced leavers by 2023/24 Q4. The quantum of the need is based on the Temporary Accommodation Care Experienced Young People Accommodation and Sufficiency Plan 2022)

<u>Risks</u>

Financial risk: should this housing stock remain inaccessible for care experienced young people, there is a significant financial risk associated with other options, for example ongoing funding of hotel and bed and breakfast options (on average at a cost of £900 a week) or short term use of high-cost semi-independent provisions (often at a cost of £2500 a week).

Reputational risk: as highlighted by Ofsted and in line with best practice in relation to care experienced provision, the aim should be that no care experienced young person is homeless or placed in bed and breakfast accommodation. Failure to address this would lead to mistrust in services by care experienced young people themselves, and a lack of confidence in Torbay as a corporate parent. In addition, failure to resolve this highlighted issue would be a significant barrier to the further developmental journey for Torbay in line with their regulatory inspection framework outcome.

Sufficiency risk: the current sufficiency mapping in regard to placements relies on throughflow in the system, particularly in relation to the availability of transitional semi-independent provision through the block contract. Should there not be sufficiency move-on accommodation available, this will in turn have a knock on impact on the availability of semi-independent provision for those cared for children between the ages of 16-18 who may be identified for these provisions in line with their transition planning. This will potentially lead to an increase in the use of higher cost semi-independent provisions, and this in turn with have a significant impact on the management of the overall placements budget.

Overview and Scrutiny from Outside Agencies

DHLUC Visit

A monitoring visit was conducted in person by the DHLUC on 22.09.22. This followed a virtual visit the previous year to monitor progress in Torbay following a visit prior to Covid. It is true to say that the visit prior to Covid revealed significant deficits within the services provided to all young people at risk of homelessness between the ages of 16 and 25 with a number of 16/17 year olds being accommodated in bed and breakfast and no plans to move them into appropriate, safe accommodation. The visit in 2021 demonstrated significant progress mainly due to the Youth Homeless prevention Team moving over into Early Help along with a joint CSC/Housing protocol being well established.

The visit in September 2022 is summarised as follows:-

- 1. Temporary Accommodation and Youth Homelessness is on the corporate risk register for scrutiny, commitment and oversight.
- 2. Corporate Parenting Board has key leads to champion areas of priority, with a dedicated lead for Housing.
- 3. Housing Strategy is being refreshed.
- 4. New process and commitment to ending use of B&B with DCS sign off and oversight.
- 5. Recommissioned Housing Related Support with block contracts for YP aged 16-24 and care leavers x65 bedspaces.

The above demonstrates progress against section 3.1.9 of what was the Children's Continuous Improvement Plan (CCIP) at that time.

6. Joint working protocols updated, and this includes advocacy for all 16/17 year old's that present as homeless.

The above fulfils the criteria of 3.1.10 of what was the CCIP at that time. However, it should be noted that further work needs to be completed regarding aware and applying the Southwark judgement consistently. Training is planned to be delivered regarding this across CSC and Housing.

- 7. DFE funded program of new Family Hubs planned, to include a response to youth homelessness within x 3 areas (which we now know we are successful by being one of the first 75 LAs notified).
- 8. Applying for Youth Investment Fund and consider if there is an opportunity to use this for 'Trauma Informed Approaches' joined up with Housing. This application was submitted on 29.09.22 and amounts to potentially a £750k investment into the Windmill and Acorn sites in Torquay.
- 9. Working with BetterGov to develop and improve data join up and reporting across Housing and Children's Services.

The above demonstrates progress against section 3.1.14 of what was the CCIP at that time. In general, Kim Davies (the leader reviewer) was satisfied that Torbay has made progress following on from her visit in 2021, significant progress following her visit in 2018 whereby the service was judged not fit for purpose and, was leaving young people in vulnerable and at times

dangerous situations.

Despite the above noted progress, the DHLUC noted that Torbay needs to progress further and specifically in areas of work with homeless young people as follows:-

1. There is a detachment between housing HCLIIC data and CSC LL data. The lack of a

consistent approach with collecting, collating, and analysing data makes for a confusing view of the situation in Torbay for young people and their housing needs. This will be addressed once the Business Intelligence team is established.

- 2. Housing information for young people is not easily accessible and the websites across all Council areas are under-developed. This includes what to do in an emergency as well as the Local Offer to care experienced young people. This will be addressed via the virtual Family hub Website.
- 3. Young people who are homeless or at risk of homelessness with complex needs have limited wrap-around multi-agency support on offer to them via Adult Services. This is being addressed now via a multi-agency 'virtual team that meets quarterly, with the first meeting held in November 2022. Young people to be discussed at the panel will be identified at the YHPP. The object of the panel discussions is to produce a purposeful support plan for the young people that meets their needs holistically as adults which in turn allows them to live as independent as possible.

Mark Riddell Visit

Mark Riddell (DFE advisor for Care Experienced Young people) visited Torbay in the latter part of 2022 in order to evaluate services provided to care experienced young people. Following this visit he made a number of recommendations that form part of the overall corporate parenting action plan. With regards to the Housing strand, the objectives and actions are a s follows:-

1 Work effectively to identify the risk of homelessness amongst our care experienced young people and ensure early intervention to address this?

Actions:

Undertake an audit of pathway plans, to consider how well the risk of homelessness is considered within this assessment.

2 As corporate parents across the Council and the partnership, do more to ensure that all care experienced young people have access to safe, affordable and sustainable long term permanent accommodation at the right time?

Actions:

Develop a Torbay Rent Guarantor Scheme.

3 Is there more we could be doing as corporate parents amongst our cohort of private landlords, to enhance their understanding of the needs of care experienced young people and what support they could access in their role as landlord?

Actions:

Plan an awareness raising event for private landlords regarding the role of Personal Advisors in supporting tenancy sustainability for care experienced young people.

4 How can we more effectively support providers and fostering families, to support preparation for independence and independent living?

Actions:

Review and refresh the current Preparation for Independence Strategy.

Summary

The challenges in general regarding housing in Torbay are well documented. However, securing appropriate housing is particularly challenging for young people with these challenges being amplified for 16/17 year olds and those young people who are care experienced. Despite the high number of 16/17 year olds and care experienced young people finding themselves at risk of homelessness over the last 12 months the overall number requiring Youth Homelessness and Resource Allocation Panel oversight has reduced. This has been due to a number of factors including more robust mechanisms to manage and support this cohort (joined up work between CSC and Housing Options) and ensuring early identification allows enough time for meaningful preventative work to be delivered. Nevertheless, as the data demonstrates in this report, there is a high level of dependence on interim commissioned accommodation coupled with a significant number of young people that will be turning 18 over the next 12 to 24 months. The requirement to deliver the housing strategy and accommodation that properties for vulnerable young people is imperative and could result in a perfect storm in the not too distant future that will put a high number of vulnerable young people at risk of homelessness.

Torbay are both being supported and scrutinised by Government agencies (DLHUC, DFE, etc). This support is being translated into robust action plans going forward that is overseen by the Corporate Parenting Housing Stream. Nevertheless, no matter how comprehensive this plan is and how robust the operational work is, this does not detract from the fact that the absence of housing stock for vulnerable young people is a significant risk that escalate over the next 12 to 18 months.