

Cabinet

30 June 2026

Sufficiency Strategy 2026-29 A Place Called Home

Portfolio Holder: Councillor Adam Price, Portfolio Holder for Children’s Services

Report from: Kelly Cogger – Assistant Director of Children’s Social Care

Author: James Harman – Head of Children’s Commissioning,
Placements and Residential Services

Summary

A sufficiency strategy for children’s services is a mandated document for all local authorities and needs to be published on the Council website. Local authorities have a statutory duty under Section 22G of the Children Act 1989 (introduced by the Children and Young Persons Act 2008) to: “Take steps to secure, so far as reasonably practicable, sufficient accommodation for looked after children within their area.”

A sufficiency strategy focuses on ensuring there is enough high-quality, appropriate support and provision available locally to meet the needs of children and families. It prioritises early help, prevention, and effective placement planning so that children can remain safely within their families or communities wherever possible, reducing reliance on high-cost or out-of-area provision while improving outcomes and stability. This will update on the previous 2023-26 Strategy and propose areas of development for the Council over the next 3 years. It needs a wider collective of Council Services to deliver the plan and so has wider commitment outside of Children’s Social Care.

The report was previously considered by the Children and Young People Overview and Scrutiny Committee on 10 June 2026, the minutes of which are set out at section 8 of this report below.

1. Recommendations

1.1. The Cabinet is recommended to note the comments of the Children and Young People Overview and Scrutiny Committee, as set out at section 8 of the report.

1.2. The Cabinet is asked to note the progress of the Sufficiency Strategy 2023 - 2026.

1.3. The Cabinet is asked to agree the Sufficiency Strategy 2026 to 2029 priorities, as set out in Appendix A to the report.

2. Suggested reasons for decisions

2.1. Approval of the Sufficiency Strategy will ensure the Local Authority is fulfilling its duty to secure, as far as reasonably practicable, sufficient accommodation and support within their local area which meets the needs of children and young people that the local authority is looking after, and those who have recently left care at the age of 18.

3. Budget and policy framework

3.1. This decision is within the Council's policy and budget framework meets both our statutory duties but also links in with the Regional Care Co-operatives Regional Sufficiency Strategy and a range of internal strategies as well as supporting the new reforms agenda.

4. Background

4.1. Medway's Sufficiency Strategy "A Place Called Home 2023-26" has come to an end and a multi-agency working group has been working on the new draft strategy which has been going through governance for the past few months. This summarises progress, continued areas of development and emerging priorities and new challenges.

4.2. A significant amount of encouraging change and progress has happened over the past 3 years including positive inspection outcomes, new and updated services and provisions and reduction in overall need for placement sufficiency. As well as developing needs such as an increase in family and child placements and Medway joining the National Transfer Scheme (NTS) for our young refugee children.

5. Advice and analysis

5.1. Publishing an agreed Sufficiency Strategy is a statutory duty for all Local Authorities. The Strategy should be a data and needs led document recognising strengths weaknesses and areas of development and improvement. This will form part of the evidence for future Ofsted Inspections for the authority.

6. Risk management

Risk	Description	Action to avoid or mitigate risk	Risk rating
Not meeting our legal obligations	If a current strategy is not agreed and published, then we will not be meeting our statutory duty as a local authority	Ensure robust and timely governance for sign off and ensure final document is well designed and accessible	C2

For risk rating, please refer to the following table:

Likelihood	Impact:
A Very likely	1 Critical
B Likely	2 Major
C Unlikely	3 Moderate
D Rare	4 Minor

7. Consultation

- 7.1. Stakeholders including parents and carers were involved in the co-production of this Strategy. This will also be translated into a young person friendly version which will capture key elements over 2/3 pages once agreed.

8. Children and Young People Overview and Scrutiny Committee

- 8.1. The report was considered by the Children and Young People Overview and Scrutiny Committee on 10 June 2026, the minutes of which are set out below:

8.2. Discussion:

- 8.3. The Committee received the report which set out updates on the previous 2023-2026 Strategy and proposed areas of development for the Council over the next 3 years. A wider collective of Council Services was required to deliver the plan and so it had wider commitment outside of Children's Social Care.

- 8.4. It was noted that a sufficiency strategy for children's services was a mandated document for all local authorities and needed to be published on the Council website. Local authorities had a statutory duty under Section 22G of the Children Act 1989 (introduced by the Children and Young Persons Act 2008) to: "Take steps to secure, so far as reasonably practicable, sufficient accommodation for looked after children within their area." It was further noted that the report would be considered by the Cabinet at its meeting on 30 June 2026.

- 8.5. **National Transfer Scheme (NTS)** - A Member raised a number of queries in relation to the NTS for unaccompanied asylum-seeking children. In response, Officers confirmed that the 80 children received over the three-year period were part of the NTS, with a combination of allocated and voluntarily accepted placements. It was explained that many young people arrived aged 17 and transition out of children's services upon turning 18, which affected overall figures. Officers highlighted that Medway had been recognised as one of the most effective local authorities in delivering the scheme, with high standards of accommodation and timely placements. All but one placement had been made within required timescales, generating approximately £300,000 in additional funding.

- 8.6. Officers further outlined the range of support available, including partnerships with accommodation providers, supported housing schemes, and culturally appropriate foster placements. In financial terms, it was reported that approximately £3.5 million had been spent in the previous year on asylum-seeking children, with £2.4 million received from central government, resulting in a Council contribution of around £1.1 million. A similar shortfall of

approximately £1.4 million was anticipated in the current financial year. The primary driver of the gap was the reduction in funding once young people turned 18, with weekly funding decreasing significantly despite ongoing support responsibilities.

8.7. Clarification was also provided that Medway was currently supporting fewer unaccompanied asylum-seeking children under 18 than its assessed allocation, and that decisions to accept placements were made based on capacity and suitability, including cultural matching considerations, rather than exceeding allocation. The ongoing financial pressures were attributed largely to funding arrangements and the cost of placements, rather than discretionary intake.

8.8. **Kinship Care** - Further questions were raised regarding data within the report, specifically around apparent discrepancies in placement numbers. Officers clarified that kinship care arrangements, such as special guardianship orders, were not classified as children in care and were therefore reported separately. Members welcomed kinship care and being placed with family such as grandparents but highlighted the need for future planning and support as carers aged. Officers confirmed that assessments included consideration of wider family support networks and contingency planning.

8.9. **Care leavers in temporary accommodation** - In response to a query, officers advised that numbers were minimal and were not located in Medway. It was noted that some cases categorised as unsuitable accommodation reflected circumstances beyond the Council's control, such as personal choices made by young people post-18.

8.10. **Decision:**

a) The Committee noted the progress of the Sufficiency Strategy 2023-2026.

b) The Committee noted the priorities for the next 3 years.

9. **Climate change implications**

9.1. The Strategy outlines plans to place children nearer to home where safe and appropriate to do so. This means less travel for families, children and professionals.

10. **Financial implications**

10.1. Funding for placements (including these external placements) will continue to be funded from the general revenue budget as it is a statutory duty for the local authority to provide sufficient care and accommodation for children in care.

10.2. The sufficiency challenges outlined will have or have the potential to create significant financial pressures. The sufficiency priorities outlined in the Strategy are designed to help mitigate or reduce the potential financial pressures from arising or escalating.

10.3. The priority actions outlined in the Strategy, if requiring additional funding over and above the budget to implement, will be the subject to the normal governance processes.

11. Legal implications

11.1. Local Authorities are required to take steps to secure, so far as is reasonably practicable, sufficient accommodation for Children in Care within their local area. In 2010 the Statutory Guidance for the sufficiency duty was issued. This guidance is explicit in placing a duty on Local Authorities to act strategically to address gaps in provision by ensuring they include in relevant commissioning strategies their plans for meeting the sufficiency duty.

11.2. The sufficiency duty is a measure, which is part of a broad suite of guidance, and legislative provisions introduced to improve outcomes for children in care. Local Authorities should consider the sufficiency duty in tandem with their duties towards children within their area under S17(1), 20, 21, 22C and 23 of the Children Act 1989.

11.3. Section 22G Children Act 1989 also imposes a duty on local authorities to take steps that secure, so far as reasonably practicable, that the local authority is able to provide looked after children with accommodation within the authority's area that meets the needs of those children, where circumstances are such that it would be consistent with the children's welfare for them to be provided with accommodation.

11.4. In taking steps to secure the provision of accommodation, the local authority must have regard to the benefit of having a sufficient number of accommodation providers in their area and a sufficient range of accommodation in their area capable of meeting different needs.

11.5. In exercising the sufficiency duty, Local Authorities should be mindful that under section 10 of the Children Act ('the 2004 Act') there is a duty upon Local Authorities to make arrangements to promote co-operation with its relevant partners with a view to improving the wellbeing of children in the authority's area. Each of the statutory 'relevant partners' in section 10 of the Act is also required to co-operate with the Local Authority in making those arrangements. The duty on Local Authorities to secure sufficient accommodation should therefore 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 child in the area.

11.6. A failure to meet the general sufficiency duty could result in judicial review proceedings, and/or damages claims for breach of the Human Rights Act 1998, proceedings against the Council which could have huge costs implications.

Lead officer contact

James Harman – Head of Children's Commissioning, Placements and Residential Services.

Appendices

Appendix A – Draft Sufficiency Strategy 2026-29

Background papers

None