

## 7. CHILDREN SEEKING ASYLUM

### INTRODUCTION

7.1. The first *Safeguarding Children* report identified children seeking asylum as a subject for further examination. It recommended that inspection work should be carried out on safeguarding arrangements for unaccompanied asylum-seeking children and the children of refugees and asylum seekers. This chapter includes evidence from:

- a review of five councils: two London boroughs and three councils outside London, which have received large numbers of asylum-seeking families with children since the National Asylum Support Service (NASS) dispersal scheme was set up in 2000;
- CSCI's Children's Services Inspections, inspections of youth offending teams and Ofsted inspections of the education of asylum-seeking children; and
- recent publications and additional discussions with social services managers involved in strategic planning and front-line services for asylum seekers.

7.2. This chapter also examines arrangements for children held with their families using evidence from HMI Prisons inspections of two immigration removal centres in England: Oakington (Cambridgeshire) and Tinsley House (West Sussex). The centre at Dungavel (South Lanarkshire) is outside the scope of this review, although asylum-seeking families based in England might be placed there pending deportation.

### ASYLUM-SEEKING CHILDREN IN CONTEXT

7.3. People come from abroad to the UK for a variety of reasons. Some are children who have fled their home country to seek asylum. They arrive with one or both parents; with friends or relatives who are their usual carers; with an agent with whom an arrangement has been made; or are unaccompanied for many different reasons [*ref.49*

<http://www.savethechildren.org.uk/scuk/jsp/resources/details.jsp?id=247&group=resources&section=publication&subsection=details&pagelang=en>]. Some of these children lodge an application for asylum, either as part of their family or other group (accompanied children); or as an unaccompanied asylum-seeking child. Other children do not make an asylum application but this does not mean that they do not have needs: they are in a variety of circumstances, and some may be isolated, or living in unsafe settings. The lack of available information about the range of children involved raises considerable concern about safeguarding arrangements, and further work needs to be carried out to identify and plan for them. On the evidence available for this review, this chapter focuses on children who have lodged an asylum claim, whether as accompanied or unaccompanied children.

7.4. Unaccompanied asylum-seeking children are the responsibility of the local council with social services responsibilities where they first present. In March 2004, councils were supporting around 7,800 children in total, of whom 76% (around 5,900) were aged 16-17. The origins of asylum seekers arriving in the UK reflect the international situation at any one time. In 2004, of the 2,755 asylum applications from unaccompanied children, the top five nationalities were Afghanistan (10% - 280), Iran (10% - 275), Somalia (9% - 245), Vietnam (7% - 180) and Eritrea (6% - 155)<sup>1</sup>. Because of the length of time that unaccompanied asylum-seeking children spend in the system, there are still a considerable number from previous trouble spots, such as the former Yugoslavia.

7.5. The majority of children arriving with their families present in London and Kent, near the main entry points to the UK, and in Croydon, where the Immigration and Nationality Directorate is based. From 2000 onwards, NASS dispersed asylum-seeker families needing accommodation to areas around the country where suitable housing was available, mainly in the Midlands and the north of England. The objective was 'to reduce the disproportionate burden on statutory services in London and the south east.' Around 9,830 families receive NASS support. Of these, 3,830 are families which preferred to maintain links with their communities and have remained in London and the south east on a subsistence only basis. Nationally, there are around 24,500 children under 16 seeking asylum. NASS supported around 64,500 asylum seekers in total in December 2004.

7.6. Under immigration law, the Immigration Service can detain people whom it plans to remove from the country. They are held in immigration removal centres. Periods of detention are often short in practice, but there is no time limit. Children may be detained as part of a family group, but unaccompanied children are not detained, although there are sometimes disputes about whether a young person is under 18 or not. The numbers of children who are detained with their families are small: there were a maximum of 75 at the time of the fieldwork. Inspections raised serious concerns about the welfare of detained children, who have not been given enough attention either in the national framework or in local safeguarding arrangements. These issues are considered in detail in paragraphs 7.27 – 7.36.

## **STRATEGIC PLANNING FOR ASYLUM-SEEKING CHILDREN**

7.7. Commissioning of age and culturally appropriate services for asylum-seeking children is a highly complex and challenging task, affected by many factors often outside the control of individual agencies. This section reviews some of those issues including immigration policy and legislation; funding; cultural needs; health issues, including mental health; and information sharing about families and individual children.

### **Policy and legislation**

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<sup>1</sup> IRSS statistics, January-December 2004. Applications from unaccompanied asylum-seeking children represented 8% of the total number of applications in 2004.

7.8. Immigration legislation and duties under the Children Acts 1989 and 2004 are not easily reconciled, since immigration controls take precedence over welfare considerations. The government is a signatory to the United Nations Convention on the Rights of the Child 1989 and seeks to adhere to the Convention in the formulation of policy affecting children and young people. However, it also has a reservation for the purpose of immigration control. Furthermore, not all the duties within the Children Act 2004 extend to the Immigration and Nationality Directorate, and this affects agencies' ability to ensure that safeguards are taken into account in service decisions involving children and their families. For example, recent legislation<sup>2</sup> will require the withdrawal of entitlement to support for families whose asylum claims have been refused and who have failed to leave the UK voluntarily. Social services may only be able to offer support to the child if accommodated apart from their family, in contravention of the Children Act principle that children are best cared for within their families. However, there are some safeguards built into this system: the assessment of needs must consider whether human rights legislation would apply in any individual case.

7.9. The Immigration and Nationality Directorate, in recognition of their lack of experience in childcare issues, have now established a Taskforce to specifically address safeguarding issues. This Taskforce is supported by a group of expert advisers to assist in developing childcare and child protection policy and practice.

7.10. Most unaccompanied asylum-seeking children are granted discretionary leave, either for 3 years or up to their 18<sup>th</sup> birthday, or for 12 months if they come from a particular country. These concessions cease at age 18. The Association of Directors of Social Services therefore advocates that social workers and personal advisers should apply a 'twin-track' approach to pathway planning for every eventuality, including a potential decision to remove the young person from the country<sup>3</sup>.

## **Funding**

7.11. Unaccompanied asylum-seeking children receive a range of council services and there are complex funding arrangements. Councils are eligible for reimbursement for direct care and support to unaccompanied asylum-seeking children, through a grant provided through NASS. However, because claims are made in retrospect, there is uncertainty about whether additional costs will be met and it is difficult to anticipate numbers needing services. Strategic planning of services is harder for this group of children than for others. Some councils and NASS also differ in their view about the levels of

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<sup>2</sup> S9 of the Asylum and Immigration Act 2004.

<sup>3</sup> Association of Directors of Social Services Asylum Task Force, *Key Transitions for Unaccompanied Asylum-seeking Children: Guidance for social workers, personal advisers and their managers working with unaccompanied children*, in draft, December 2004.

services that should be provided within normal funding allocations or grant-funded.

7.12. The Hillingdon judgment confirmed legislation and guidance on councils' responsibilities to unaccompanied asylum-seeking children, clarifying that they should provide support to these children based on a thorough assessment of their needs [*refs.43* [http://www.dh.gov.uk/PublicationsAndStatistics/LettersAndCirculars/LocalAuthorityCirculars/AllLocalAuthorityCirculars/LocalAuthorityCircularsArticle/fs/en?CONTENT\\_ID=4003946&chk=kx09kw](http://www.dh.gov.uk/PublicationsAndStatistics/LettersAndCirculars/LocalAuthorityCirculars/AllLocalAuthorityCirculars/LocalAuthorityCircularsArticle/fs/en?CONTENT_ID=4003946&chk=kx09kw),<sup>44</sup> <http://www.lawreports.co.uk/qbaugc0.2.htm>,<sup>45</sup> <http://www.hmso.gov.uk/acts/en2000/20000035.htm>]. A number of 16-17 year old unaccompanied asylum-seeking children had previously been categorised as receiving assistance under S.17 of the Children Act 1989, and consequently received support falling short of the provision of accommodation. The implications of the judgment were that they should be regarded instead as being accommodated as looked after children under S. 20. They would therefore be eligible to receive appropriate leaving care support post-18, including subsistence support to undertake further and higher education courses for those with leave to remain. A grant from the Department for Education and Skills is made as a contribution to the costs of additional care-leavers arising as a result of the Hillingdon judgment. The grant is triggered when the numbers of unaccompanied asylum seeker care leavers are more than 44 (full time equivalent). This grant is not attached to individuals, so can be used for areas of greatest need. The grant was paid for the first time in 2004/05, and future grant levels are being reviewed.

### **Cultural needs**

7.13. Meeting children's cultural needs poses considerable challenges, particularly finding suitable foster-care placements in areas where there is no existing community of the relevant ethnic group. Councils and agencies in London and the south east have experience of working with diverse communities and highly mobile populations. Other large cities also have well-established ethnic minorities and refugee groups. However, some councils in the dispersal areas lacked such experience and had under-estimated the range and levels of support needed to develop their experience in meeting those needs more recently. Conversely, some councils in London and the south east have set up services that may now be under-utilised because of changing population needs. Asylum-seekers who have been dispersed are often subjected to racial discrimination from local communities, whether white or black, and minority ethnic communities.

### **Information**

7.14. NASS routinely informs each LEA and primary care trust about new NASS cases in their area. It also funds enabling officers in each regional consortium to co-ordinate the response of the relevant agencies. However, many councils do not have a full picture of the numbers of unaccompanied asylum-seeking children in their areas because other placing councils

sometimes fail to notify them. Also, information about individual asylum-seeking children, including welfare and health needs, is often scarce.

**Good practice**

The national pilot of the Safe Case Transfer project, funded by the Home Office, and led by Manchester City Council, is enabling participating local authorities to take over support of 16 & 17 year old asylum seekers transferred from Kent to Greater Manchester. The transfer and placement of young people will be made through a carefully planned and managed process based on detailed assessment of need. This will ensure appropriate support and safeguards for this potentially vulnerable group.

CSCI/Ofsted

7.15. A particular safeguarding issue for unaccompanied asylum-seeking children is that of their true age. Where a young person's age is not clear, social workers must carry out an age assessment. Determining age is not an exact science, especially in cases where a child's growth or development might have been affected by social and medical factors. There are therefore risks, for example, in placing young people together if one is much older than stated. It is also important not to place young people together from different sects or ethnic backgrounds who may be in conflict in their home country.

**Good practice**

The National Register of Unaccompanied Children was set up by the London Asylum Seekers Consortium and NASS, with funding and support from the Home Office and the Department for Education and Skills. Secure website access allows the responsible council or the council covering the area where children are placed to find out about the whereabouts of all these children. Councils can also post information about children they are worried about. The Association of Directors of Social Services, the Association of Local Government and the London Asylum Seekers Consortium are on the project board. CSCI/Ofsted

7.16. Identifying where children are in private fostering situations, rather than with their own families, is also a problem that raises important safeguarding issues. Agencies sometimes fail to recognise that a child is privately fostered or insufficiently question claims that a child is closely related to the people he or she is living with, and consequently fail to alert social services to the situation. As paragraph 7.3 highlighted, some children or young people could therefore be living in situations where they are at extreme risk. This is also an issue for some children in immigration removal centres who are accompanied by an adult who is not part of their family. From July 2005, National Minimum Standards for private fostering will be introduced. Local councils' performance against these standards will be subject to inspection. The National Minimum Standards, along with new measures on private fostering in the Children Act 2004 and replacement private fostering regulations which will come into force at the same time, will focus local council's attention on private fostering and require them to take a more proactive approach to identifying arrangements in

their area. It is expected that they will improve notification rates and compliance with the existing legislative framework for private fostering.

## **ASYLUM-SEEKING CHILDREN IN THE COMMUNITY**

### **Making safeguarding a priority**

7.17. Overall, there is strong commitment in all the councils visited to safeguarding asylum-seeking children. Councils' policies promote children's rights and there are robust procedures for child welfare and protection. The majority of unaccompanied asylum-seeking children are looked after, and so have the same safeguards and benefits as other looked after children. Some councils have developed policy and guidance on inter-agency protocols for safeguarding children from abroad.

7.18. However, the quality and levels of inter-agency planning and co-ordination of services are very inconsistent and, in some areas, health services are not sufficiently involved. Some good work is being carried out by voluntary sector organisations with asylum-seeking children but it is not always well co-ordinated with work by councils and other statutory organisations. There is a need for improved joint working arrangements with community organisations, including churches and mosques, since some children and young people may not otherwise come to the attention of public services.

7.19. Information sharing about and identification of asylum seekers and other mobile sectors of the population are particularly inconsistent. Some councils are placing homeless families, who are sometimes overstayers, in other council areas without notifying the receiving council. Families 'disappear', sometimes moving of their own accord, and their onward destination is not ascertained. This means that some children in need of safeguarding may be slipping through the net. However, where LEAs use their ethnic minority achievement teams well, databases allow successful monitoring of the mobility of some asylum-seeking children as well as of their educational achievement. The planned role of an information sharing index system (see paragraph 5.63) and also the National Register of Unaccompanied Children will assist in identifying children or groups who may otherwise disappear from view.

#### **Good practice**

The London Borough of Newham has made a Neighbourhood Renewal Fund bid to enable the authority to focus on 100 children who have disappeared (the majority of whom are likely to be asylum seekers). These have been identified by youth offending teams, because they are previously unknown young people coming into the justice system, or health services, following incidents of self-harm or attempted suicide.

[CSCI/Ofsted]

## **Assessing and meeting needs**

7.20. Assessing the needs of children seeking asylum is a complex process, often restricted by a lack of available information about the child, especially when he or she is unaccompanied. Only unaccompanied asylum seeking children receive a formal assessment, or children who have been brought to a council's attention for other reasons. NASS contracts for placing families do not provide for an automatic assessment of the needs of children who are with their families, although NASS has published guidance about referring concerns appropriately. The Home Office is currently considering a bid to establish social work teams in council areas covering the main entry points to the UK to ensure speedier assessments to meet needs and to identify children in need. A pilot assessment team is currently operating at the Immigration and Nationality Directorate's offices in Croydon and Dover.

7.21. Assessment is more comprehensive where unaccompanied asylum-seeking children are referred to specialist social work teams. These teams carry out effective holistic assessments and link children to the services they need, such as health care services. The range of agencies working with adults and families can be too far removed from social work services and may not always refer children for assessments of need or possibly child protection concerns, where necessary.

7.22. When their child protection needs are recognised, asylum-seeking children are dealt with equally well as other children. However, there is doubt about whether all concerns are adequately identified, including whether children are subject to trafficking for sexual exploitation or under-age girls are kidnapped for forced marriage. These risks are likely to be greatest for children who are in the country illegally and who are not formally known to statutory agencies. There are some good practice examples, such as a specialist child protection adviser for asylum-seeking children in one council. But it is often difficult to pin down the evidence of abuse and some councils are less familiar with the issues than others.

7.23. Unaccompanied asylum-seeking children are often older than most looked after children and are therefore placed in a residential home or are in independent living with support rather than in foster care. Where fostering is considered appropriate, some councils experience considerable difficulties finding foster carers to address unaccompanied children's ethnic, religious, cultural and linguistic needs. This is particularly so when there is a sudden influx of children from a country that has previously provided few immigrants or where a particular ethnic community is located a long way from the area of the responsible council. Some councils have put considerable effort into recruiting and developing a network of foster carers from particular communities where there has been significant demand for placements. Other councils are providing mentors to support young people over 18 to care for younger relatives or others, matching carers by religion and providing links to community resources for the child and carers. Some asylum seeking young people reject potentially helpful matched placements as they have been

advised by family or agents to be placed with an English speaking white family.

### **Good practice**

The London Borough of Hillingdon experienced high demand for placements of unaccompanied children from the Horn of Africa and Afghanistan. The Fostering Team targeted the recruitment of foster carers from these communities, by advertising in local community press and by word of mouth. 14 carers from Eritrea and two from Afghanistan have been recruited over a period of several years. Fewer children are now arriving from the Horn of Africa and many have moved on to independent living, but these carers' considerable experience is being put to use for other unaccompanied children.

[CSCI]

7.24. Some councils are still not always adhering to legislation and guidance as clarified by the Hillingdon judgment [refs. 43, [http://www.dh.gov.uk/PublicationsAndStatistics/LettersAndCirculars/LocalAuthorityCirculars/AllLocalAuthorityCirculars/LocalAuthorityCircularsArticle/fs/en?CONTENT\\_ID=4003946&chk=kx09kw](http://www.dh.gov.uk/PublicationsAndStatistics/LettersAndCirculars/LocalAuthorityCirculars/AllLocalAuthorityCirculars/LocalAuthorityCircularsArticle/fs/en?CONTENT_ID=4003946&chk=kx09kw), 44 <http://www.lawreports.co.uk/qbaugc0.2.htm>, 45 <http://www.hmsso.gov.uk/acts/en2000/20000035.htm>]. Unaccompanied asylum-seeking children under 16 generally receive a good service, but unaccompanied young people over 16 are sometimes placed in lodgings or bed and breakfast and are not allocated a social worker but dealt with by the duty officer. There is also evidence that some social services are placing looked after unaccompanied asylum-seeking children in other council areas without notification. As with all looked after children placed out of area, this puts them at risk of poor support and safeguarding. Services provided to unaccompanied asylum-seeking children preparing to leave care are generally good. Support for over-18s who were not previously treated as looked after children is less consistent.

### **Good practice**

The London Borough of Hillingdon has a dedicated residential unit for unaccompanied asylum-seeking young people. The unit specialises in supporting them to prepare for independent living. There is a diverse team of staff in relation to ethnicity, religion and language, which works in partnership with the Children's Asylum Service.

[CSCI]

7.25. In assessing the health care needs of asylum-seeking children, mental health issues are often the highest priority, especially for victims of torture, sexual abuse or trauma associated with war. However, CAMHS providers report that there is a lack of capacity and research evidence on which to base assessment and provision for victims or those suffering from displacement. There are also specific health care needs associated with asylum-seeking children, including gynaecological problems following sexual abuse or rape,

unknown immunisation status, previously undetected medical conditions, HIV or hepatitis and a higher rate of disability.

#### **Good practice**

The London Borough of Newham has a multi-disciplinary health transition team, which is an innovative approach. The transition team is a directly managed PCT GP practice, which assists families (including asylum-seeking families) arriving in Newham to gain access to the health services they need.

[CSCI/Ofsted]

7.26. Providing an appropriate education for high numbers of asylum-seeking children is a challenge. In one London borough, for example, 17% of the school population are refugees and asylum seekers. LEAs are mostly making good efforts to meet children's education needs, appointing additional staff to provide curriculum and pastoral support services to schools and children. This has had a positive impact on children's attendance and on developing close links between the family and the school. There are, however, examples of inadequate completion of personal education plans for unaccompanied looked after children and insufficient liaison between social workers and teachers to monitor plans jointly. Also, as for other looked after children, there is sometimes a slow response from LEAs on school placements, especially in the secondary sector, which militates against the security and support that schools can provide. There are sometimes difficulties in matching unaccompanied asylum-seeking children to appropriate schools, particularly for children over 14, which can deny them the opportunity to follow GCSE or other accredited courses.

#### **Good practice**

Newham LEA has a mid-phase admissions policy that provides a supportive and comprehensive induction for children arriving mid-term, for example by providing mentors and assessing needs, and mid-phase admissions guidance for schools.

[Ofsted/CSCI]

## **ASYLUM-SEEKING CHILDREN IN IMMIGRATION REMOVAL CENTRES**

### **Priority given to safeguarding nationally**

7.27. For children held with their families in immigration detention, there has been no judgment equivalent to the Howard League judgment about the application of children's welfare or human rights legislation [*ref.26* . <http://www.lawreports.co.uk/qbnovc0.3.htm>]. However, it would be reasonable to suggest that these children have the same entitlements as the Howard League judgment determined for children in prison custody.

7.28. The IND operational manual requires authorisation for the detention of children to be given at senior level, taking into account human rights issues. They should consider the child's interests and welfare, balanced against the necessity of detention. However, in recent inspections, there has been no evidence that this exercise has been carried out.

7.29. Ministers also strengthened the existing internal review process for detained children. Detention is reviewed at progressively senior levels at seven, 10, 14 and 21 days and requires Ministerial authorisation after 28 days. However, they are centralised administrative procedures and are not independent. Nor are they informed by the experience of staff in immigration removal centres who are involved in the direct care of children. Similarly, there is no independent procedure for determining the ages of those claiming to be children.

7.30. The Immigration and Nationality Directorate has not issued detailed guidance or procedures setting out the care regime for children in immigration removal centres (equivalent to the relevant Prison Service Order) [ref.31 <http://www.hmprisonservice.gov.uk/resourcecentre/psispsos/listpsos/index.asp?startrow=51>], nor has it ensured that appropriate and effective child protection systems and links are in place, or that independent assessments are made about the welfare and developmental needs of each child. There are no agreed protocols with relevant local agencies that have responsibilities to detained children under the Children Act 1989 and related legislation. Both of these features are essential to provide a framework for the consistent safeguarding and care of children in immigration removal centres.

### **Local safeguarding arrangements**

7.31. In the immigration removal centres inspected, relationships between families detained and staff were generally satisfactory. However, physical conditions were not appropriate for long-term detention and educational provision was particularly inadequate for older children.

7.32. Staff often made their best efforts in the absence of a satisfactory framework for the care regime of detained children. Custody officers could be drawn from the general staff pool and deployed anywhere within an immigration removal centre, although there were staff in each unit who worked with family units, having expressed an interest. Custody officers generally received half-day child protection training, but there was no additional training for working with children. Not all staff who came into contact with children had been subject to enhanced Criminal Records Bureau checks.

7.33. Though many families spend only short periods in detention, the adverse effect of detention on the welfare and development of children who are placed in immigration removal centres is of great concern. The process of removal from familiar surroundings, which often occurs with no notice, can have a traumatic effect on children who are removed from their peer groups and schools. There are examples of the removal of pupils who had spent up

to four years in school and were shortly to complete GCSEs. They were unable to continue their examination courses and were thus prevented from gaining recognition of their achievement. The process also could have significantly adverse social and emotional effects on them, as well as on other pupils in the school and their teachers. Educational provision in all immigration removal centres consists of a specified number of contracted teaching hours, but the quality of education is not stipulated and inspectors considered it deficient for all but the youngest children.

7.34. Even more concerning is the effect of detention itself on a child, which is likely to compromise children's ability to thrive. Children may have had traumatic experiences in their home country before coming to the UK. Inspectors found evidence that the additional effects of restrictions on children's movements and activities and of witnessing their parents' powerlessness had led, in some cases, to eating and sleeping problems and depression.

7.35. Apart from a routine medical examination, there are no systems for assessing a child's immediate welfare needs or vulnerability on arrival, including any risk of significant harm under S.47 of the Children Act. There is little information provided or available to make such assessments. Processes are inadequate to determine parents' capacity or willingness to care for children, or to establish that they are indeed the parents of the child concerned. Moreover, it must be assumed that the longer the child remains in detention, the greater the risk of significant harm; and there are no procedures to instigate area child protection team strategy conferences for children whose detention stretches into weeks or even months.

7.36. This is compounded by generally poor relationships in England with ACPCs and social services. Protocols agreed with councils are not sufficiently effective in ensuring that they are able to carry out responsibilities under the Children Act 1989 or arrangements for convening a multi-agency strategy meeting if a child is assessed as being at risk of significant harm. In addition, there are reports of a lack of response to referrals from social services, while social services refer to the absence of clarity about their role and powers in relation to these children. Although both the English immigration removal centres are required to have written child protection procedures, they do not operate effectively and the child protection co-ordinators in post are not specifically qualified.

## **CONCLUSIONS**

7.37. Councils and other agencies face a challenging and complex task in planning and providing services for asylum-seeking children. This is compounded by factors often outside their control, including unpredictable numbers, difficulties in reconciling immigration requirements and welfare considerations, uncertainties about funding and scarcity of accurate information.

7.38. All the councils reviewed have a strong commitment to safeguarding asylum-seeking children, but those in London and the south east have greater experience of working with diverse communities and highly mobile populations. Some councils in the dispersal areas had under-estimated the range and levels of support needed and their lack of experience in meeting those needs.

7.39. Key areas for improvement include:

- joint working between immigration officials and local agencies. Appointing qualified and experienced child care advisers to immigration officials would help reconcile immigration and welfare considerations, especially in relation to children in immigration removal centres;
- information sharing between agencies. Some councils fail always to notify receiving councils of the placement of homeless families or unaccompanied asylum-seeking children;
- assessment of welfare needs. Agencies coming into contact with asylum seekers may not always be referring children for assessments of children in need or possibly child protection issues, where necessary;
- healthcare provision, particularly specialist mental health care;
- identifying child protection concerns. Where concerns are picked up, they are normally handled equally well for asylum-seeking children as for others. Some issues may not be adequately identified, including private fostering, sexual exploitation and kidnapping for forced marriage;
- matching unaccompanied asylum-seeking children to suitable foster carers, where some councils experience considerable difficulties. While this remains an intractable problem, some councils have developed innovative solutions from which others could learn;
- service provision for unaccompanied asylum-seeking children aged 16-18 and support for over-18s not previously looked after; and
- the welfare of children held in immigration removal centres. The lack of effective guidance and procedures, agreed between the Immigration and Nationality Directorate and local ACPCs, on child protection arrangements to be applied in immigration removal centres is of considerable concern. Such guidance should include immediate and continuing independent social services assessments, education and care plans and child protection team strategy conferences, which inform decisions about continuing detention.