



Information Governance Team

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17 October 2025

Dear Sir/Madam

**Freedom of Information Act 2000 (FOIA)
Request ID: FOI736776618**

Thank you for your request for information relating to Looked after children accommodation.

You have requested the following information:

Policies on accommodation for Looked After Children

1. Please provide documents, such as policy and protocol documents, and/or guidance notes, relating to policies that govern the assessment of suitability and allocation of accommodation for unaccompanied asylum-seeking children² by your council.

Unaccompanied asylum-seeking children are placed within our usual policies and procedures by using the placement referral form. In addition, we complete a risk assessment to support the assessment of suitability to supported accommodation provision for UASC (attached).

Please refer to:
<https://www.legislation.gov.uk/ukxi/2023/416/contents>

2. Please provide documents, such as policy and protocol documents, and/or guidance notes, relating to policies that govern the use of unregulated accommodation³ for looked after children.

Please see the attached document - Management oversight & process for an unregistered placement May 2025.

3. Please provide documents, such as policy and protocol documents, and/or guidance

notes, relating to policies that govern the use of supported accommodation⁴ for looked after children.

The information you requested falls under the exemption(s) in Section 21 of the Freedom of Information Act 2000, which relates to 'information reasonably accessible to the applicant by other means.'

The exemption applies as the information is published and publicly available to view by accessing the following links:

<https://coventrycs.trixonline.co.uk/chapter/placements-in-other-arrangements?search=supported%20accommodation>

<https://www.legislation.gov.uk/uksi/2023/416/contents>

4. If the policies for assessing and determining accommodation outcomes for unaccompanied asylum-seeking children and other looked after children differ, please confirm this.

They do not differ however, there is an additional risk assessment completed prior to placing unaccompanied asylum seeking children within supported accommodation provision (see above)

5. Please provide documents, such as policy and protocol documents, and/or guidance notes, relating to policies that govern the assessment of suitability and allocation of accommodation for child victims of trafficking who are looked after by your council.

Please see policies & procedures above. The risk assessment considers additional vulnerabilities for children who have been trafficked and actions needed to mitigate risks are identified in the individual placement plan/ safety plan.

6. What training, if any, is provided to staff working in supported accommodation regarding the specific needs of unaccompanied asylum-seeking children?

Staff working in supported accommodation including the Coventry House Project access training via their organisation and their training standards are subject to Ofsted regulation.

<https://www.legislation.gov.uk/uksi/2023/416/contents>

7. What training, if any, is provided to staff working in supported accommodation regarding the specific needs of child victims of trafficking?

Staff working in supported accommodation access training via their organisation and their training standards are subject to Ofsted regulation.

<https://www.legislation.gov.uk/uksi/2023/416/contents>

8. What process or procedures are in place to address complaints or concerns raised by children in supported accommodation?

The information you requested falls under the exemption(s) in Section 21 of the Freedom of Information Act 2000, which relates to 'information reasonably accessible to the applicant by other means.'

The exemption applies as the information is published and publicly available to view by accessing the following link:

<https://www.coventry.gov.uk/childrens-social-care/young-peoples-guide-making-social-care-complaint/6>

Each provider is required to have a complaints process in place, which identifies how to make a complaint and who they can get support from such as Social Worker, PA IRO, Advocate, NSPCC, Ofsted etc.

Regulation 31

<https://www.legislation.gov.uk/ukxi/2023/416/contents>

9. Over the last 12 months (or nearest equivalent period for which data is available), how many safeguarding concerns or incidents have been reported in relation to unaccompanied asylum-seeking children in supported accommodation?

We hold the information which you have asked for, but we have estimated that the cost of meeting your request would exceed the cost limit of £450 specified in the Freedom of Information and Data Protection (Appropriate Limit and Fees Regulations 2004). This represents the estimated cost of one person spending 18 hours or more, in determining whether the information is held, locating, retrieving and extracting it.

This information is not held in a reportable format and would require an officer to manually trawl through the data to collate the relevant information. We estimated that this will exceed 18 hours and therefore this part of your request has been refused under section 12(2) of the Act.

10. As of October 2024 (or nearest available data), how many of the unaccompanied asylum-seeking children looked after by your council were child victims of trafficking (as defined at footnote 5)?

We hold the information which you have asked for, but we have estimated that the cost of meeting your request would exceed the cost limit of £450 specified in the Freedom of Information and Data Protection (Appropriate Limit and Fees Regulations 2004). This represents the estimated cost of one person spending 18 hours or more, in determining whether the information is held, locating, retrieving and extracting it.

This information is not held in a reportable format and would require an officer to manually trawl through the data to collate the relevant information. We estimated that this will exceed 18 hours and therefore this part of your request has been refused under section 12(2) of the Act.

Placement stability

11. As at October 2024 (or nearest available data), please confirm the average length of time spent in a placement by a child looked after by your council.

From active placements on 1st October 2024 the average placement length was 597 days.

12. As at October 2024 (or nearest available data), please confirm the average length of time spent in a placement by an unaccompanied asylum-seeking child looked after by your council.

158 days.

13. As at October 2024 (or nearest available data), please confirm the average length of time spent in a supported accommodation placement by a child looked after by your council.

104 days.

14. As at October 2024 (or nearest available data), please confirm the average length of time spent in a supported accommodation placement by an unaccompanied asylum-seeking child looked after by your council.

104 days.

Missing episodes

1. Over the last 12 months (or nearest equivalent period for which data is available), how many missing episodes were recorded by your council in relation to looked after children?

61 missing episodes.

2. Over the last 12 months (or nearest equivalent period for which data is available), how many missing episodes were recorded by your council in relation to unaccompanied asylum-seeking children?

We are unable to report the actual number of episodes to protect confidentiality as the total number of episodes is less/ fewer than 5. This has been done as the Council considers that this information meets the definition for personal data set out in Section 3(2) and 3(3) of the Data Protection Act 2018 (DPA) as:

(2) personal data means any information relating to an identified or identifiable living individual (subject to subsection (14)(c))”

(3) “Identifiable living individual” means a living individual who can be identified, directly or indirectly, in particular by reference to –

*(a) an identifier such as a name, an identification number, location data or an online identifier, or
(b) one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.”*

The Council thus considers that the requested information is caught by the exemption to disclosure contained in Section 40 (2) of the FOI Act and the related first condition of Section 40 (3). A disclosure made under FOIA is judged to be to the wider world. The individuals involved, would not reasonably expect that their details would be disclosed in this way.

3. Over the last 12 months (or nearest equivalent period for which data is available), how many missing episodes from supported accommodation were recorded by your council in relation to looked after children?

We hold the information which you have asked for, but we have estimated that the cost of meeting

your request would exceed the cost limit of £450 specified in the Freedom of Information and Data Protection (Appropriate Limit and Fees Regulations 2004). This represents the estimated cost of one person spending 18 hours or more, in determining whether the information is held, locating, retrieving and extracting it.

This information is not held in a reportable format and would require an officer to manually trawl through the data to collate the relevant information. We estimated that this will exceed 18 hours and therefore this part of your request has been refused under section 12(2) of the Act.

4. Over the last 12 months (or nearest equivalent period for which data is available), how many missing episodes from supported accommodation were recorded by your council in relation to unaccompanied asylum-seeking children?

We hold the information which you have asked for, but we have estimated that the cost of meeting your request would exceed the cost limit of £450 specified in the Freedom of Information and Data Protection (Appropriate Limit and Fees Regulations 2004). This represents the estimated cost of one person spending 18 hours or more, in determining whether the information is held, locating, retrieving and extracting it.

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The supply of information in response to a FOI/EIR request does not confer an automatic right to re-use the information. You can use any information supplied for the purposes of private study and non-commercial research without requiring further permission. Similarly, information supplied can also be re-used for the purposes of news reporting. An exception to this is photographs. Please contact us if you wish to use the information for any other purpose.

For information, we publish a variety of information such as: [FOI/EIR Disclosure Log](#), [Publication Scheme](#), [Facts about Coventry](#) and [Open Data](#) that you may find of useful if you are looking for information in the future.

If you are unhappy with the handling of your request, you can ask us to review our response. Requests for reviews should be submitted within 40 days of the date of receipt of our response to your original request – email: infogov@coventry.gov.uk

If you are unhappy with the outcome of our review, you can write to the Information Commissioner, who can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or email icocasework@ico.org.uk.

Please remember to quote the reference number above in your response.

Yours faithfully

Information Governance