



Coventry City Council

Information Governance Team

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Dear Sir/Madam

Freedom of Information Act 2000 (FOIA)

Request ID: FOI768450016

Thank you for your request for information relating to Unregulated Children's Placements.

You have requested the following information:

I am requesting the following information regarding children and young people placed by the Local Authority in unregulated accommodation (i.e. any setting not registered with Ofsted as a children's home or supported accommodation provider):

1. Number of unregulated placements within the last 12 months.

(Please specify the reporting period used.)

November 2024 – November 2025 – 23 placements.

Please note that this includes providers who were awaiting Ofsted Registration under the supported accommodation regulations who applied late, but were advised they could operate until registration process was completed.

2. Number of unregulated placements currently in use as of the date of this request.

None.

3. Types of accommodation used for unregulated placements in the last 12 months (e.g., council-owned properties, temporary accommodation, holiday lets, hotels, caravans, Airbnbs, properties awaiting Ofsted registration, or any other categories you use).

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.

We are unable to provide a response to this question as the information is not recorded in a reportable format. It would require an officer to manually trawl through records which estimate to exceed 18 hours. This part of your request has been refused under section 12(2) of the Act.

4. Staffing agencies and/or service providers used to support or staff unregulated placements in the last 12 months.

It is our view that the information is exempt from disclosure under Section 43(2) – Commercially Sensitive Information. Section 43(2) exempts information from disclosure where disclosure of that information would, or would be likely to, prejudice the commercial interests of any person (an individual, a company, the public authority itself or any other legal entity). The public interest test is shown below:

Arguments in favour of disclosure.

- Promote accountability and transparency for the Council's decisions and in its spending of public money.
- Assist the public to understand and challenge our decisions.
- Inform the public of the activities carried out on their behalf, allowing for more user involvement and collaborative decision making.
- Enable the public to better scrutinise the public monies spent

Arguments against disclosure.

- There is a public interest in allowing public authorities to withhold information which if disclosed, would reduce providers' ability to compete in a commercial environment.
- The successful providers operate in a competitive market. If prejudicing the commercial interests of the successful providers in the market would distort competition in that market, this would not be in the public interest.
- Disclosure of information may cause unwarranted reputational damage or loss of confidence in the Council.

Having considered the arguments for and against disclosure, the Council has decided that the public interest in this case is best served by maintaining the exemption under section 43(2) FOIA and by not disclosing the information requested.

To assist, our published Contracts Register is accessible via:
<https://www.coventry.gov.uk/contractsregister>

5. Total cost to the Local Authority for unregulated placements within the last 12 months. £2.6m.

If held, please also provide average hourly staffing rates (or rate ranges) for these placements.

If specific provider rates are considered commercially sensitive, an anonymised average or

range will be sufficient.

We do not hold this information and are advising you as per Section 1(1) of the Act.

6. Please provide the job title (not the name) of the person or role responsible for authorising unregulated placements within the Local Authority.

If held, please also provide a brief outline of the approval or decision-making process for authorising such placements.

The Director of Children's Services.

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