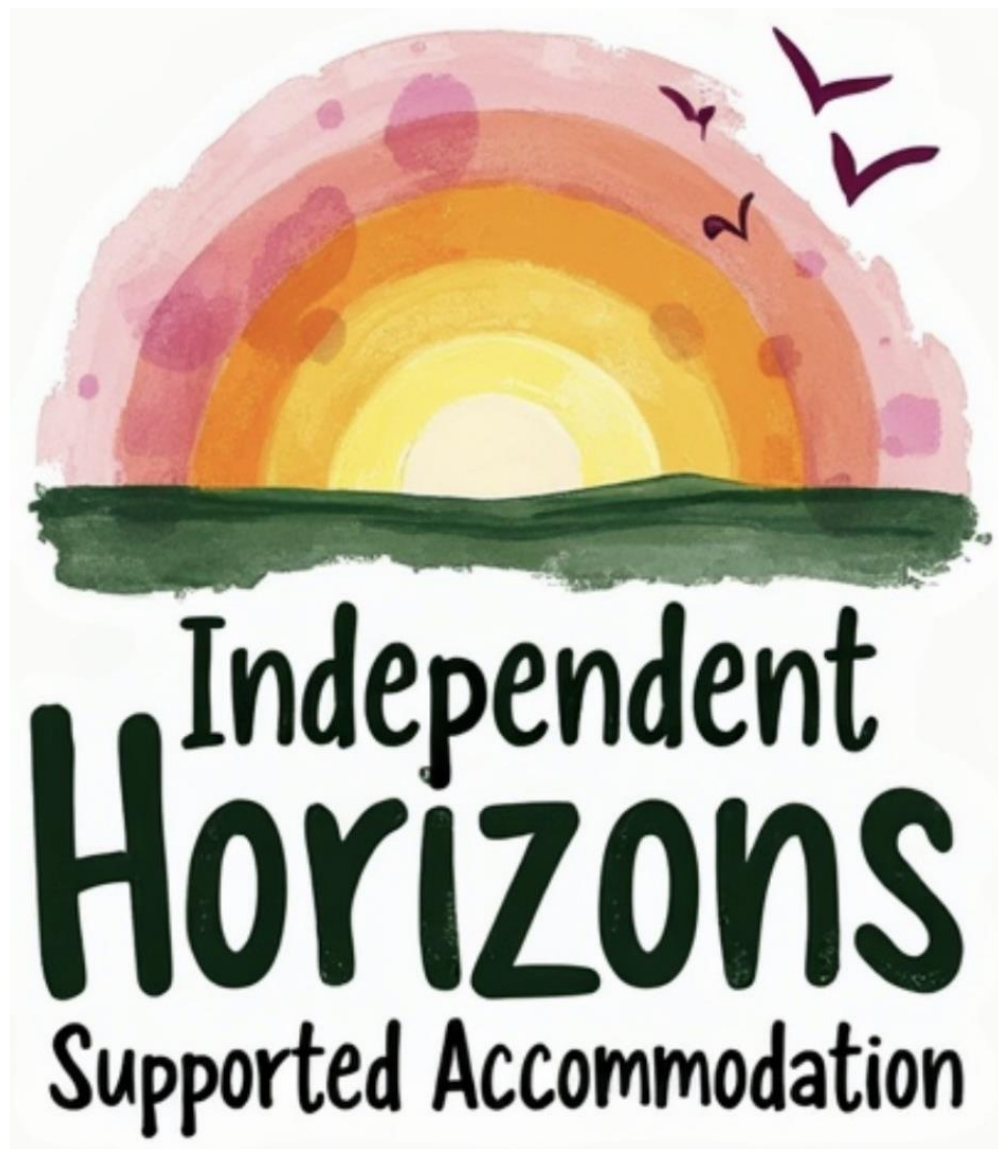


INDEPENDENT HORIZONS LIMITED



STATEMENT OF PURPOSE

Nelson House

Ofsted-Registered Supported Accommodation

Category 2 - Shared/Group Living

Ofsted URN: 2833373

Version: v3

Status: Approved | Approval date: 19 October 2026 | Effective date: 19 October 2026

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1. DOCUMENT CONTROL

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This Statement of Purpose describes the supported accommodation service provided by Independent Horizons Limited at Nelson House and the way in which that service is organised and delivered.

It is intended to provide young people, families, local authorities, commissioners, professionals, Team Members and Ofsted with a clear and accurate account of:

- what Independent Horizons provides;
- who the service is intended for;
- the level and type of support available;
- how young people are safeguarded and involved;
- how the service is managed;
- and the boundaries of the supported-accommodation model.

Detailed operational procedures are held within the appropriate Independent Horizons policies, guidance and individual planning documents and are not reproduced in full within this Statement.

Legal and Regulatory Framework

Independent Horizons operates with regard to the current legal and regulatory framework applicable to registered supported accommodation, including:

- the Supported Accommodation (England) Regulations 2023;
- the Department for Education Guide to the Supported Accommodation Regulations including Quality Standards;

- the four supported-accommodation Quality Standards: Leadership and Management, Protection, Accommodation and Support;
- the Ofsted Social Care Common Inspection Framework for supported accommodation for looked-after children and care leavers aged 16 and 17;
- the Children Act 1989 and associated care-planning requirements where relevant;
- the Equality Act 2010;
- current statutory safeguarding guidance, including Working Together to Safeguard Children;
- and other relevant statutory and regulatory guidance applicable to the young people supported by the service.

2. PROVIDER, OFSTED REGISTRATION AND SERVICE DETAILS

Independent Horizons Limited is the registered provider of Nelson House.

Karen Burton is registered with Ofsted under her previous surname, Karen Plunkett.

Where it is necessary to connect her current name with Ofsted or historic regulatory records, she is referred to as **Karen Burton (née Plunkett)**. In ordinary references throughout this Statement she is referred to as **Karen Burton**.

Service information	Supported Accommodation
Registered Provider	Independent Horizons Limited
Company number	15957910
Ofsted URN	2833373
Date of Ofsted registration	9th December 2025
Registered Service Manager	Karen Burton (née Plunkett)
Nominated Individual	Karen Burton (née Plunkett)
Director of Operations	Gary Burton
House Manager	Michael Robinson
Principal office of registered provider	10 Western Road, Romford, Essex, RM1 3JT
Supported accommodation premises	Nelson House, 100 Nelson Road Central, Great Yarmouth, Norfolk, NR30 3BB
Registered accommodation category	Category 2 - shared/group living accommodation used to accommodate looked-after children and care leavers
Core admission age	16-17
Maximum capacity	Three young people
Sex of young people accommodated	Mixed-sex provision - male and female young people may be considered subject to individual matching and risk assessment

Independent Horizons operates Nelson House as a small shared/group-living supported-accommodation service.

The service is intended for young people whose needs can appropriately be met within supported accommodation and who will benefit from purposeful support to continue developing independence in preparation for adulthood.

3. PURPOSE, ETHOS, VALUES, AIMS AND OUTCOMES

Independent Horizons exists to provide young people aged 16 and 17 with a safe, stable and supportive home from which they can continue developing the skills, confidence, relationships and practical abilities required for adulthood.

Independent Horizons is owned and led by Karen and Gary Burton, a husband-and-wife team who bring different but complementary experience to the service.

We created Independent Horizons because we wanted to provide something deliberately small and relational: a home where young people are known as individuals, rather than being understood only through their referral, placement history or the risks surrounding them.

We recognise that a move into supported accommodation may follow loss, disruption, uncertainty, conflict, previous placement difficulties or other adverse experiences. Young people may arrive with understandable reasons to be cautious about adults, services or another move.

Our approach is therefore:

- relationship-based;
- trauma-responsive;
- strengths-based;
- young-person-centred;
- reflective;
- and respectful of each young person as an individual.

Our purpose is not simply to provide accommodation. We provide purposeful support that supports young people develop greater autonomy while remaining appropriately safeguarded.

At the heart of this is a simple belief: young people are more than the things that have happened to them.

We want young people living at Nelson House to experience adults who are interested in who they are, what matters to them, what makes them laugh, what they are good at, who is important to them and what they want their future to look like.

Relationships are therefore not separate from the work we do. They are part of how the work happens.

A conversation in the kitchen, travelling somewhere together, cooking, sorting out a difficult problem, laughing over something ordinary, recovering after an argument or simply knowing that an adult will still be there tomorrow can be just as important as a planned Key Work session.

Young people should be able to make mistakes, reflect on what happened and try again. Where something has gone wrong, our focus is on safety, responsibility, learning and repair rather than defining the young person by one incident.

Where it is safe and appropriate, we welcome the people who matter to young people into their lives at Nelson House. Family, friends and other important relationships can provide continuity, identity and belonging, and growing independence should not mean becoming disconnected from the people who care about you.

What We Want Nelson House to Feel Like

Nelson House should feel first and foremost like a home.

We want it to be safe, stable, warm and welcoming, but also ordinary.

There should be space for quiet, privacy and difficult conversations, but also for music, cooking, television, visitors, jokes, shared activities and the everyday noise of young people living their lives.

We aim for laughter to be a normal part of the house.

Young people should be able to relax as well as grow and achieve. They should feel able to talk about things that are difficult without immediately feeling judged, punished or reduced to a problem that needs managing.

Team Members remain interested in young people as people, including during the times when relationships are tested or situations become difficult.

Preparing for adulthood happens through ordinary life as well as formal support. Independence does not mean expecting a 16- or 17-year-old to manage everything alone.

It means creating opportunities to practice, make choices, solve problems, experience natural consequences, make mistakes safely, ask for support and gradually take greater responsibility.

As confidence and skills develop, the amount and type of support may change, but our aim is that young people know that appropriate support and trusted relationships remain available.

Our Values

Our five values are not intended simply to describe what Independent Horizons believes. They should be visible in how we behave, how we make decisions and how young people experience us.

Innate Potential

We believe every young person has strengths, abilities and potential that cannot be properly understood by looking only at their difficulties.

We do not define a young person by:

- their referral;
- risk history;
- diagnosis;
- previous placements;
- offending;
- incidents;
- or the most difficult thing that has happened to them.

Those things may be important and must never be ignored where they affect safety or support. But they are not the whole person.

We deliberately look for strengths, abilities, humour, interests, relationships, hopes, ambitions and possibilities.

This means noticing progress that might otherwise be missed and recognising that development is rarely a straight line.

Sometimes a young person may struggle to believe that things can be different. Part of our role is to continue holding appropriate hope for them during those periods, while supporting them identify what they can influence and what the next achievable step might be.

Innate Potential means seeing who the young person is as well as what has happened to them.

Respect

Respect means more than being polite.

It means listening properly, explaining decisions and being honest when something cannot happen in the way a young person wants.

It means knocking before entering private space, respecting privacy and recognising that young people have their own views, relationships, identities, preferences and ways of understanding the world.

Young people may disagree with us. Disagreement does not remove their right to be heard.

Where possible, we speak with young people rather than about them, including them in conversations and decisions that affect their lives.

Adults are expected to model the behaviour they ask of young people. This includes how we speak, how we manage disagreement, how we acknowledge when we have got something wrong and how we repair relationships afterwards.

Respect is reciprocal, but our respectful practice is not conditional upon a young person being compliant, calm or easy to support.

Inclusion

Nelson House should feel like the young person's home while they live there.

Inclusion means more than being physically present in the building. It means having a sense of belonging and being able to participate in and influence the environment in which you live.

Young people should be supported to:

- participate in decisions;
- influence their own support;
- contribute to how the house works;
- maintain important relationships;
- express their identity;
- practise their culture or faith;
- pursue their interests;
- and be accepted as an individual.

We recognise that treating everybody identically does not always create equality.

Where a young person communicates, understands information, experiences the environment or accesses opportunities differently, we consider what we may need to change in our own communication, support or practice.

Inclusion means asking, "What will support this young person participate?", rather than expecting every young person to fit one standard approach.

Collaboration

Our approach is based upon working with rather than doing to.

Young people should play an active role in shaping their own Support Plans, goals and independence work.

Team Members need to work openly with one another so that young people experience consistency without adults becoming rigid or losing sight of the individual.

Families, friends and other important people may be involved where this is appropriate, safe and consistent with the young person's wishes and plans.

We work openly with social workers, personal advisers, education providers, Youth Justice Services, health professionals and other members of the young person's network.

Collaboration does not mean simply agreeing with everybody.

Where we believe that there is professional drift, an unmet need, insufficient planning or a decision that is not serving the young person well, Independent Horizons will raise this respectfully and challenge appropriately.

Good partnership sometimes means asking difficult questions.

Trust

Trust is rarely created through one conversation.

It is built through ordinary, repeated experiences of adults being honest, reliable and consistent.

We build trust by:

- doing what we say we will do;
- not making promises we cannot keep;
- explaining decisions honestly;
- maintaining appropriate confidentiality;
- keeping clear and predictable boundaries;
- acknowledging our own mistakes;
- repairing relationships when something has gone wrong;
- and remaining relationally present during difficult periods rather than withdrawing support because a young person is struggling.

We recognise that some young people may have experienced adults who were inconsistent, unsafe, unavailable or who broke their trust.

They may therefore have very good reasons to be cautious.

Trust cannot be demanded from a young person simply because an adult holds a professional role. It has to be earned.

Our Aims

Independent Horizons aims to support young people:

- feel safe and experience stability and belonging;
- build trusting and appropriate relationships with adults;
- understand and manage risks with increasing independence;
- develop practical independent-living skills;
- engage meaningfully in education, employment or training;
- build positive relationships and natural support networks;
- maintain and improve physical and emotional wellbeing;
- develop confidence, resilience and self-worth;
- strengthen decision-making and problem-solving skills;
- understand their rights;
- participate meaningfully in decisions affecting them;
- prepare for sustainable accommodation and adulthood;
- and experience respectful and planned transitions wherever possible.

Progress is individual.

Success is not measured solely by the absence of incidents or difficulties.

It is also seen through meaningful improvements in safety, stability, relationships, skills, engagement, confidence and independence.

4. WHAT SUPPORTED ACCOMMODATION MEANS AT INDEPENDENT HORIZONS

Independent Horizons provides support not care.

This distinction is important, but it does not mean that supported accommodation should be minimal, distant or impersonal.

Young people aged 16 and 17 remain children. They require active safeguarding, reliable adults, good relationships and purposeful support.

At Independent Horizons, independence does not mean leaving a young person to manage alone.

Support should create opportunities for young people to practise skills, make decisions, solve problems, ask for support, recover from mistakes and gradually take greater responsibility for their own lives.

The relationship between a young person and the adults supporting them is an important part of that process. Team Members can provide warmth, encouragement, humour, honest conversations and emotional support while maintaining appropriate professional boundaries.

Our role is not to remove every difficulty from a young person's life. It is to support them develop the confidence, skills, relationships and judgement they will need to navigate difficulties increasingly for themselves.

At Independent Horizons, support may include:

- practical guidance;
- prompting;
- modelling;
- reflective conversations;
- Key Work;
- Independent Living Skills work;
- emotional support;
- support with appointments;
- education, employment and training support;
- community-based work;
- risk-management work;
- advocacy;
- health and wellbeing support;
- support around relationships;
- and preparation for adulthood.

Independent Horizons does not operate as a children's home and does not provide:

- personal care;
- waking-night care;
- continuous individual observation;
- sustained routine 1:1 or 2:1 supervision;
- secure containment;
- restraint-based behaviour management;
- nursing care;
- psychiatric treatment;
- therapy as a replacement for commissioned clinical services;
- or a level of ongoing care and supervision equivalent to children's-home provision.

A young person may nevertheless experience a period when they temporarily require a greater level of support.

Where it remains safe and appropriate, Independent Horizons will respond flexibly and consider proportionate additional support rather than assuming that increased need means that the placement has failed.

Where a young person's needs become persistently incompatible with supported accommodation, Independent Horizons will work with the placing/accommodating authority and relevant professionals to review suitability and plan the safest next steps.

5. WHO NELSON HOUSE IS FOR

Nelson House provides supported accommodation for up to **three young people**.

New admissions are for young people aged **16 or 17** who fall within the statutory framework for registered supported accommodation.

Nelson House is a **mixed-sex service**.

Referrals may be considered for male and female young people. Sex forms one part of matching but does not, by itself, determine suitability.

Gender identity and gender expression are respected and considered individually, separately from the regulatory requirement to identify the sex of young people the service is intended to accommodate.

Placement decisions consider:

- the young person's needs and wishes;
- their current level of independence;
- the existing young people living at Nelson House;
- safeguarding and exploitation risks;
- relationships and compatibility;
- sexualised-behaviour concerns where relevant;
- privacy and dignity;
- cultural and religious considerations;
- communication or disability-related needs;
- locality risk;
- and any reasonable adjustments required.

Independent Horizons does **not** set a standard maximum placement length.

Placement duration is individually planned and reviewed according to:

- the young person's needs;
- progress;
- stability;
- relevant statutory plans;
- and transition arrangements.

Independent Horizons does not accept referrals for adults aged 18 or over.

An existing young person may remain at Nelson House beyond their 18th birthday for a **planned transitional period** (no longer than two weeks) where this is:

- in the young person's interests;
- individually assessed as appropriate;
- agreed with the relevant placing/accommodating authority;
- compatible with the needs and safeguarding of other young people living at Nelson House;

- and part of a clear transition and move-on plan.

Continuation beyond 18 is therefore an individual transitional arrangement, not a change to Independent Horizons' core 16-17 admission model.

6. REFERRAL, MATCHING AND ADMISSION

Every referral is considered individually.

The purpose of matching is to decide:

1. whether Nelson House can safely and appropriately meet the needs of the referred young person; and
2. whether the placement is compatible with the needs, safety and welfare of young people already living there.

The referral process considers professional and statutory information alongside discussion with the social worker or placing authority and, wherever possible, the young person.

Matching considers matters including:

- legal status and reason for placement;
- current needs and goals;
- existing independence skills;
- physical health;
- medication;
- emotional and mental wellbeing;
- self-harm or suicide risk;
- missing history;
- exploitation and contextual safeguarding;
- substance and alcohol use;
- violence, aggression, weapons or serious property-damage concerns;
- offending or Youth Justice involvement where relevant;
- education, employment and training;
- family and relationship networks;
- identity, culture and religion;
- communication needs;
- disability and accessibility;
- locality risk;
- compatibility with existing residents;
- the level of support required;
- and whether those needs can reasonably be met within supported accommodation.

Referral information is used to inform discussion rather than to label a young person.

Young people should have an opportunity to give their own account of information recorded about them and to explain:

- what they believe the current concerns are;
- what supports;
- what does not support;
- what they want support with;
- and what is important to them.

Before a placement is accepted, Independent Horizons must be reasonably satisfied that:

- Nelson House is suitable;

- risks can be managed safely and proportionately;
- the support available is sufficient;
- and the placement is compatible with the registered service model.

A referral may be declined where:

- the placement falls outside the functional boundaries of supported accommodation;
- risks cannot reasonably be reduced to a safe level;
- there is significant incompatibility with another resident;
- locality factors make the placement unsuitable;
- or another material factor means Nelson House cannot safely meet the young person's needs.

Where a placement is agreed, transition arrangements are planned with the young person and professional network wherever circumstances allow.

Urgent and Same-Day Referrals

Independent Horizons may consider urgent or same-day referrals on a case-by-case basis.

They are not guaranteed.

Urgency changes the timescale, not the standard of decision-making.

An urgent placement will only be accepted where sufficient reliable information can be obtained to complete an accelerated but meaningful matching and risk assessment.

Relevant information may initially be provided through professional discussion, telephone or secure email where circumstances make completion of every formal document before admission impracticable.

Outstanding formal documentation must then follow promptly.

Before an urgent admission, Independent Horizons must have sufficient information, as relevant, about:

- legal status and placing authority;
- why the placement is required urgently;
- current risks and significant recent events;
- missing and exploitation concerns;
- violence, weapons or serious property-damage risks;
- substance and alcohol use;
- self-harm, suicide or significant mental-health concerns;
- Youth Justice or offending involvement;
- medication and immediate health needs;
- family/contact arrangements;
- prohibited contacts where relevant;
- education, employment or training;
- required support level;
- compatibility with existing residents;
- and relevant professional and out-of-hours contacts.

Where material information is missing and Independent Horizons cannot reasonably establish that the placement is safe, suitable, compatible and within the supported-accommodation model, the placement will be deferred or declined, even if a place is available.

Where an urgent placement is accepted, an early post-admission review will take place as fuller information becomes available.

This includes prompt review or completion of:

- the Risk Assessment;
- Support Plan;
- PBS arrangements where required;
- medication arrangements;
- and the planned support package.

7. NEEDS IH CAN SUPPORT AND FUNCTIONAL SERVICE BOUNDARIES

Independent Horizons does not use blanket exclusions based solely upon diagnosis, history or presenting risk.

The fact that a young person has experienced or presents with:

- mental-health needs;
- a history of self-harm;
- neurodiversity;
- substance or alcohol use;
- exploitation concerns;
- offending or Youth Justice involvement;
- missing episodes;
- emotional dysregulation;
- verbal aggression;
- property damage;
- or previous placement instability

does **not automatically make them unsuitable** for Independent Horizons.

Instead, the assessment considers:

- current severity and frequency;
- predictability and triggers;
- protective factors;
- the young person's level of independence;
- impact upon other residents and Team Members;
- compatibility with the current group;
- the support required to manage risk safely;
- and whether those needs can reasonably be met within supported accommodation.

A young person may therefore fall within Independent Horizons' overall service scope but still be unsuitable for Nelson House at a particular time because of compatibility, locality or other individual circumstances.

Independent Horizons would not be appropriate where a young person requires, on a persistent or ongoing basis:

- regular personal care rather than support to develop their own self-care;
- waking-night staffing;
- continuous or sustained 1:1 or 2:1 supervision in order to remain safe;
- constant observation or monitoring;
- routine physical restraint or restrictive intervention;
- secure containment or restrictions incompatible with supported accommodation;
- intensive clinical, nursing, psychiatric or therapeutic intervention which must be delivered within the placement;
- a level of day-to-day care and supervision that is effectively children's-home provision;

- or management of risks that cannot reasonably be reduced to a safe level through support planning, staffing, environmental measures and multi-agency intervention.

These are functional thresholds, not diagnosis-based exclusions.

A temporary increase in need does not automatically make Nelson House unsuitable.

Where safe and appropriate, Independent Horizons will first consider proportionate steps to stabilise the placement.

8. NELSON HOUSE - ACCOMMODATION, FACILITIES AND ACCESSIBILITY

Nelson House is located at:

100 Nelson Road Central

Great Yarmouth

Norfolk

NR30 3BB

Nelson House is a three-storey property providing three individual bedrooms for young people alongside shared household facilities.

Facilities include:

- individual furnished bedrooms;
- shared kitchen;
- dining space;
- communal living space;
- two shared shower rooms;
- quiet/private discussion space;
- Team Member base and sleep-in accommodation;
- laundry facilities;
- and a rear courtyard.

Young people are encouraged to personalise their bedrooms and to regard them as their own private space while respecting the privacy of others.

The accommodation is maintained with regard to:

- fire safety;
- health and safety;
- repairs and maintenance;
- cleanliness;
- security;
- access to ordinary household facilities;
- privacy;
- dignity;
- and comfort.

Detailed locality information, including community risks, transport, nearby services and environmental factors, is maintained within the Locality Risk Assessment rather than duplicated in this Statement.

Meeting the Accommodation Standard

Independent Horizons aims to ensure that Nelson House provides young people with a stable, comfortable, secure, positive and homely environment from which they can develop greater independence while retaining appropriate support and safeguarding.

The suitability of both Nelson House and its location is considered through Independent Horizons' locality and premises-assessment arrangements. The suitability of the location is reviewed at least once in each calendar year, taking account of relevant information and views.

The location of Nelson House is considered in relation to young people's ability to access education, training or employment, health services, transport, leisure and community facilities and to maintain or develop appropriate relationships and community connections. Independent Horizons seeks to ensure that young people are able to participate in ordinary community life without unnecessary stigma arising from where they live.

Nelson House is maintained as a domestic home rather than an institutional environment. Young people have privacy, access to ordinary household facilities and opportunities to personalise their own space. Avoidable hazards are identified and addressed, and the premises are managed in accordance with applicable health-and-safety and fire-safety requirements and Independent Horizons' controlled safety arrangements.

Each young person has their own bedroom with appropriate space for their belongings and personal possessions. Bedroom arrangements provide appropriate physical security and sufficient telephone and/or internet connectivity to enable young people to maintain relationships, participate in education or training and manage ordinary daily life.

Where a young person does not have access to necessary basic household or personal items, Independent Horizons will ensure that appropriate items are available. This may include bedding, towels, personal-hygiene products and ordinary kitchen or household equipment.

Accessibility and Reasonable Adjustments

Nelson House is not described as universally accessible.

Disability or additional need does not, by itself, exclude a young person from consideration.

Accessibility and disability-related needs are considered through referral, matching and Risk Assessment.

Reasonable and practicable adjustments may include:

- changes to furniture or bedroom layout;
- visual information;
- easy-read material;
- communication aids;
- sensory or environmental adjustments;
- signage, prompts and structure;
- minor equipment or adaptation;
- changes to routines;
- changes to the way support is delivered;
- and support to access appointments, services and community facilities.

Where physical alterations are proposed, Independent Horizons will consider whether they are:

- safe;
- practicable;
- proportionate;
- and appropriate for the property.

Because Nelson House is a three-storey property and young people's bedrooms and shower facilities are upstairs, significant mobility needs require careful assessment.

Matching must consider whether the young person can safely access:

- their bedroom;
- bathroom/shower facilities;
- communal areas;
- entry and exit routes;
- and emergency evacuation arrangements.

Where reasonable adjustment can make a placement suitable, Independent Horizons will consider it.

Where the physical limitations of Nelson House mean that a young person cannot safely access or use the accommodation, the placement may be declined on the basis of the suitability of the building for that individual.

9. SAFETY, SECURITY, PRIVACY, ROOM CHECKS AND SURVEILLANCE

Independent Horizons seeks to balance safety with dignity, privacy and growing independence.

Young people have their own bedroom and the bedroom is treated as their private personal space.

Weekly Room Checks

Independent Horizons carries out one agreed and proportionate room check each week.

The purpose is to support:

- hygiene;
- fire safety;
- repairs and maintenance;
- a safe living environment;
- and the young person's ability to manage their own living space.

Wherever possible:

- a suitable time will be agreed;
- the purpose of the check will be explained;
- the young person will be invited to be present;
- and the least intrusive approach will be used.

Routine room checks are not searches for wrongdoing or contraband.

They must not be used as punishment, retaliation or a behavioural consequence.

Where there is a separate reasonable concern relating to welfare, fire or smoke, substances, weapons, significant property damage or another safeguarding issue, an additional safety check may be necessary.

Any additional check must be risk-led, proportionate, based on a clear reason and appropriately recorded.

Surveillance

The surveillance devices currently in use at Nelson House are:

- a front-door Ring doorbell/camera;
- and a Ring rear-courtyard camera.

Independent Horizons does not routinely use internal CCTV or audio recording.

The use of any monitoring or surveillance device by Independent Horizons is restricted to outside communal/shared areas. Surveillance will not be used inside Nelson House.

Surveillance must only be used where:

- its purpose is safeguarding and promoting the welfare of young people;
- each young person's accommodating authority has consented to the arrangement;
- young people are informed in advance that surveillance will take place;
- and the surveillance is no more intrusive than necessary, taking account of each young person's privacy.

Surveillance is not used as a default means of monitoring young people's behaviour.

Any proposal for an additional monitoring or surveillance device would only be considered within a communal/shared area, where there is a clearly identified safeguarding or welfare purpose and where all applicable statutory requirements are met.

Any such arrangement must be proportionate to the identified concern, supported by a clear rationale, appropriately explained to the young people affected, reviewed regularly and removed when the identified need no longer exists.

Access to surveillance information is restricted to appropriately authorised people. Detailed arrangements for retention, access, privacy and data management are maintained within the relevant controlled governance arrangements.

10. TEAM STRUCTURE, MANAGEMENT AND GOVERNANCE

Independent Horizons has a clear management and accountability structure.

The service is owned and led by Karen and Gary Burton. Their professional backgrounds are different and deliberately complementary.

Karen brings extensive children's social-care, safeguarding and leadership experience. Gary brings substantial operational and business-management experience.

Together, these perspectives support a service which is personal and relational while remaining professionally governed, accountable and clear about safeguarding responsibilities and organisational boundaries.

Both Directors remain visible within Nelson House, but their roles do not replace the clearly defined responsibilities of the Registered Service Manager, House Manager or Team Members.

Karen Burton - Director, Registered Service Manager and Nominated Individual

Karen Burton is registered with Ofsted under her previous surname, Karen Plunkett. Where regulatory or historic linkage is required she may be referred to as Karen Burton (née Plunkett). Otherwise, she is referred to throughout this Statement as Karen Burton.

Karen began her professional career in early education before moving into Norfolk Children's Services, where she spent nearly 20 years working across children's safeguarding and social-care practice.

During that career she progressed through frontline and management roles and worked with children, young people, families and professional networks across a wide range of circumstances.

Immediately before establishing Independent Horizons, Karen was a Team Manager within Norfolk Children's Services' Life Beyond Care service from October 2022 to December 2025.

In that role she led a multidisciplinary Team working with care-experienced young people and young adults, including young people living in supported accommodation and preparing for greater independence. Her work involved close partnership with supported-accommodation providers as well as social workers, personal advisers and wider professional networks.

Across her career, Karen has developed substantial experience in areas including:

- safeguarding;
- child exploitation;
- serious youth violence;
- substance use;
- mental-health complexity;
- homelessness;
- placement instability;
- strengths-based practice;
- professional challenge;
- multi-agency working;
- reflective supervision;
- and workforce development.

This experience has directly shaped Independent Horizons' approach to matching, safeguarding, Risk Assessment, Support Planning, recording, Team development and relational practice.

Karen's professional approach is based upon seeing a young person in the round.

Risk must be properly understood and managed, but it should not become the young person's identity. Adults should remain curious about what sits behind presentation and behaviour, notice strengths and change, and continue reflecting on their own practice even when situations are difficult.

Karen holds overall responsibility for:

- regulatory oversight;
- safeguarding governance;
- service quality;
- matching;
- management oversight;
- professional practice;
- quality assurance;
- and the continued suitability of the service.

Karen normally attends and works from Nelson House four days each week, generally between 10.00am and 5.00pm.

Her regular presence enables her to know young people personally, understand their day-to-day experience, remain accessible to young people and Team Members and maintain direct oversight of support, safeguarding, risk and practice.

While at Nelson House, Karen may work from the house as part of her Registered Service Manager and Director responsibilities, spend time with young people and Team Members, join ordinary conversations or activities, provide additional management or safeguarding support, attend where circumstances require additional oversight, respond in an emergency or call in informally to remain connected with young people and the life of the home.

Karen's presence is additional to the Team Member providing the planned direct-support shift. She is not used as the sole person covering that planned shift.

This enables Karen to remain directly connected to young people's experiences while retaining the management capacity required to oversee safeguarding, practice and service quality.

Gary Burton - Director of Operations

Gary Burton brings more than 30 years' experience of running and managing substantial business operations.

His professional background includes experience of:

- operational leadership;
- organisational oversight;
- financial and resource management;
- compliance and accountability;
- practical problem-solving;
- business continuity;
- operational efficiency;
- and service development.

This complements Karen's children's-social-care background.

Gary's role is not simply about maintaining a building. His responsibility is to ensure that the practical and organisational foundations of Independent Horizons are strong enough for good support to happen consistently.

Within Independent Horizons, Gary is responsible for operational areas including:

- premises;
- health and safety;
- resources;
- maintenance;
- business continuity;
- operational systems;
- and practical support to the service.

Gary normally attends Nelson House once each week, generally between 10.00am and 5.00pm, and may attend at other times where this is supportful or required.

His involvement is intentionally visible and relational.

Young people know Gary and may spend time with him through practical activities, shared interests or ordinary conversation. He may provide additional practical or operational support, attend in an emergency or where another adult presence is supportful, or call in simply to remain connected with young people and the home.

Gary's presence is additional to the Team Member providing the planned direct-support shift and he is not used as the sole person covering that planned shift.

Karen and Gary's Complementary Roles

Karen and Gary bring different professional perspectives to Independent Horizons.

Karen's background provides the children's-social-care, safeguarding, relational and professional-practice foundation of the service. Gary's background brings operational leadership, organisational discipline, practical problem-solving and business oversight.

Neither perspective replaces the other.

Together they support an organisation in which good relationships with young people are backed by clear systems, safe premises, resources, accountability and effective governance.

Independent Horizons is intentionally personal and relational in its approach, while remaining professionally accountable, clearly governed and consistent in its safeguarding responsibilities.

Both Directors remain accountable within clearly defined roles. The Registered Service Manager retains regulatory and safeguarding leadership, the House Manager provides day-to-day operational leadership, and Team Members retain responsibility for the planned direct support provided to young people.

Both Directors are DBS checked.

Michael Robinson - House Manager

Michael Robinson provides day-to-day operational leadership at Nelson House.

His role includes oversight of shifts and handovers, day-to-day Team practice, young-person plans, recording quality, safeguarding follow-up, premises matters and escalation to the Registered Service Manager.

Brooke Skilton-Knights - Clinical Adviser

Brooke Skilton-Knights provides the defined Clinical Adviser function described in section 18.1 of this Statement.

Wider Workforce

The wider workforce consists of Support Workers and Bank Support Workers who provide direct day-to-day support to young people.

The full named workforce, role information, recruitment information, qualifications, training and development arrangements are maintained within the Workforce Development Plan rather than this Statement of Purpose.

11. STAFFING, OVERNIGHT SUPPORT AND ON-CALL ARRANGEMENTS

Nelson House operates a shared support model.

Team Members are rostered to provide support across the day and evening.

Karen or Gary may also be present at Nelson House as an additional person, but their attendance does not replace the Team Member responsible for the planned direct-support shift.

An on-site Team Member remains overnight on a sleep-in basis.

The sleep-in Team Member is available to respond to emergencies, safeguarding concerns and other significant needs arising overnight.

Independent Horizons does not provide waking-night staffing as part of its supported-accommodation model.

The sleep-in arrangement does not mean that young people are continuously monitored or supervised overnight.

There is always access to appropriate senior management support.

A Director or the House Manager is available in a management/on-call capacity to provide advice, support decision-making and attend Nelson House where circumstances require this.

The Team Member providing direct support therefore does not operate without access to senior management support.

Director attendance is additional to the planned direct-support staffing arrangement. Management/on-call availability provides further senior support and does not replace the Team Member responsible for the planned direct-support shift.

Exact rota and sleep-in times are maintained in operational workforce documents rather than fixed within this Statement.

12. PLANNED INDIVIDUAL SUPPORT AND ENHANCED SUPPORT

The standard Independent Horizons placement provides:

up to 10 hours of planned individual support per young person each week.

The actual focus and use of those hours is determined by:

- the young person's assessed needs;
- their wishes;
- their Support Plan;
- their current circumstances;
- and their developing independence.

Planned individual support may include:

- Key Work;
- Independent Living Skills work;
- education, employment and training;
- appointments;
- budgeting and financial skills;
- cooking and household management;
- health and wellbeing work;
- relationships and communication;
- community-based work;
- housing preparation;
- reflective work following significant events;
- advocacy;
- professional meetings;
- and other agreed goals.

These hours are separate from shared Team Member availability in Nelson House.

The 10 hours are not continuous supervision and are not the only times at which a young person may approach or receive support from the Team Member on duty.

Support should remain:

- purposeful;
- proportionate;
- needs-led;
- and focused on developing independence rather than creating unnecessary dependency.

Flexible Enhanced Support

Ten planned individual-support hours is not treated as an absolute ceiling where a young person's needs temporarily increase.

Where assessed needs, risks or circumstances require additional support, Independent Horizons may agree a temporary or individually commissioned enhanced level of support.

This may include:

- additional planned individual-support hours;
- increased management oversight;
- additional Key Work;
- additional ILS;
- greater practical support;

- additional Clinical Adviser consultation;
- direct Clinical Adviser involvement where appropriate;
- increased multi-agency coordination;
- and other proportionate measures agreed with the placing authority.

Where additional resources or funding are required, these will be agreed with the placing authority.

Enhanced support is needs-led rather than package-led.

Independent Horizons does not define one universal fixed enhanced-hours package.

Where additional support is introduced, it will be reviewed with the aim of reducing it again when safe and appropriate as the young person becomes more stable or independent.

Enhanced Support Step-Down Planning

Where a formal enhanced-support arrangement is introduced, Independent Horizons will develop an Enhanced Support Step-Down Plan at the outset.

The plan will identify:

- why enhanced support is required;
- the needs or risks it is intended to address;
- what additional support is being provided;
- intended outcomes;
- indicators of improvement or increased stability;
- what needs to happen before support can reduce;
- how support will be stepped down;
- responsibilities;
- and arrangements for formal review with the placing authority.

Enhanced support should be:

- purposeful;
- proportionate;
- focused on stabilisation;
- focused on increasing independence;
- and time-limited wherever reasonably possible.

While a formal enhanced-support arrangement remains in place, the Registered Service Manager will review its necessity, proportionality and effectiveness daily.

This daily management oversight considers whether:

- the enhanced level remains necessary;
- risk has increased or reduced;
- the current measures remain effective;
- support can safely begin to step down;
- plans or Risk Assessments need amendment;
- further professional involvement is required;
- or the young person's level of need is becoming persistent and potentially incompatible with supported accommodation.

This does not require the entire multi-agency plan to be formally rewritten each day.

Significant decisions and changes will be recorded.

If a young person cannot safely step down from a persistently high level of support, supervision or restriction despite appropriate enhanced support and multi-agency intervention, Independent Horizons will initiate an urgent multi-agency suitability review.

That review does not automatically mean immediate placement termination.

The focus remains on:

- safety;
- placement stability;
- professional planning;
- and, where another provision is needed, achieving the safest and most planned transition reasonably possible.

13. SUPPORT PLANNING, RISK ASSESSMENT, PBS AND REVIEW FOLLOWING SIGNIFICANT EVENTS

Every young person has an individual Support Plan developed with them and informed by their voice, relevant statutory plans and professional information.

The Support Plan starts from:

- the young person's aspirations;
- strengths;
- needs;
- worries;
- priorities;
- and their view of the support that would be supportful.

Support Plans may address:

- education, employment or training;
- health and wellbeing;
- relationships;
- family and contact;
- money;
- housing;
- independence;
- substance use;
- safety;
- emotional regulation;
- community engagement;
- identity;
- and other goals important to the young person.

Support Plans are reviewed with the young person at least monthly, and sooner where significant change, new information or events indicate that review is required.

Young people are supported to identify:

- what they want support with;
- what they wish to manage independently;
- what supports them;
- what does not support them;
- and what they want to achieve.

Support and risk planning at Independent Horizons will show the young person's:

- perspective;
- strengths;
- triggers;

- supportful strategies;
- and aspirations.

A plan focused solely on risk is not treated as a meaningful Support Plan.

Risk Assessment

Risk Assessment is used to support safe independence, not simply to catalogue everything that has previously gone wrong.

Risk planning considers:

- specific current and foreseeable risks;
- known information and its source;
- the young person's own view;
- triggers and pressure points;
- early warning signs;
- protective factors;
- strategies that support;
- actions that may make matters worse;
- proportionate management actions;
- and arrangements for review.

The least restrictive response consistent with safety is preferred.

Positive Behaviour Support

Where appropriate, an individual PBS approach identifies how adults can:

- understand presentation and behaviour;
- recognise triggers;
- prevent unnecessary escalation;
- respond consistently;
- and support safer alternatives.

PBS does not excuse harmful behaviour.

It seeks to understand what contributes to behaviour while maintaining clear responsibility, boundaries and safety.

Significant-Event Review

Following a significant incident, safeguarding concern, missing episode, police involvement, substantial change in mental health or presentation, or another material risk change, Independent Horizons considers whether there is a need to:

- complete or link the appropriate specialist record;
- make relevant safeguarding or regulatory notifications;
- review immediate safety;
- obtain and record the young person's view;
- review or update the Risk Assessment;
- review PBS;
- review the Support Plan;
- complete restorative or follow-up work;
- involve the professional network;
- and obtain management oversight.

Incidents, safeguarding, de-escalation, Risk Assessments, PBS and Support Plans are intended to operate as one connected practice system.

Where review concludes that no amendment is required, that professional decision should be recorded where appropriate.

14. KEY WORK, ILS AND PREPARATION FOR ADULTHOOD

Each young person receives purposeful Key Work according to their needs, goals and Support Plan.

Key Work is not limited to formal sit-down sessions.

Meaningful planned work may take place through conversation, practical activities, community work, appointments, shared tasks and reflective discussions, provided the purpose and outcome are appropriately recorded.

Independent Living Skills work may include:

- budgeting;
- shopping;
- cooking;
- healthy eating;
- laundry;
- cleaning;
- maintaining a bedroom;
- managing shared living;
- travel;
- arranging appointments;
- managing correspondence;
- completing paperwork;
- understanding bills and household costs;
- tenancy awareness;
- healthy and safe relationships and boundaries;
- problem-solving;
- using community services;
- digital skills;
- health self-management;
- medication independence;
- and preparation for future accommodation.

Young people are not expected to arrive already proficient in every aspect of independence.

The purpose of Independent Horizons is to understand what the young person can already do, where their strengths lie, what they want to learn and where proportionate support will support them progress.

Independent-living progress is reflected through the young person's Support Plan, Key Work, Independent Living Skills work, education, employment and training work, Risk Assessment and relevant LEIF records.

Independent-living work is not confined to formal sessions. Reflective conversations, practical support, shared activities and ordinary household experiences may all provide meaningful opportunities to develop skills, confidence and independence.

Shared cooking, meals, community activities and ordinary household tasks may be used flexibly to build relationships and independence where they are relevant and meaningful to the individual young person.

The aim is to prepare young people for adulthood through supported practice rather than expecting them to cope alone. Support should change as confidence and ability develop while relationships with trusted adults remain available.

15. SAFEGUARDING AND PROTECTION

Safeguarding is central to the service.

Young people aged 16 and 17 remain children, including where they demonstrate substantial independence.

Independent Horizons seeks to create an environment in which young people feel able to talk about:

- worries;
- unsafe relationships;
- exploitation;
- substance use;
- self-harm;
- conflict;
- online concerns;
- and other risks

without fear of humiliation or automatic punishment.

Team Members are expected to:

- recognise and respond to signs of harm;
- remain professionally curious;
- listen carefully to disclosures;
- take immediate action where required;
- report safeguarding concerns through the correct route;
- make or support referrals to statutory agencies where required;
- record concerns accurately;
- preserve relevant information;
- and continue supporting the young person during safeguarding processes.

Independent Horizons does not investigate statutory child-protection matters in place of the responsible agencies.

Concerns about the conduct or suitability of an adult working with young people are managed through the appropriate allegations procedure and, where relevant, the Local Authority Designated Officer route.

A general safeguarding concern does not automatically become a LADO matter.

Where a safeguarding concern relates to:

- another young person;
- a family member;
- a partner;
- a peer;
- an adult in the community;
- or another external source,

the response may instead involve:

- Children's Social Care;
- police;

- health;
- the placing authority;
- or another appropriate safeguarding service.

Where an immediate risk to life or serious injury exists, emergency services will be contacted.

Young people are supported to understand that confidentiality has limits where information needs to be shared to protect them or another person.

Where safe and appropriate, the young person will be told:

- what information is being shared;
- with whom;
- and why.

15.1 Missing, Exploitation and Contextual Safeguarding

Independent Horizons recognises that risk does not only arise inside the home.

Contextual safeguarding considers risks associated with:

- peers;
- relationships;
- unsafe adults;
- neighbourhoods;
- public spaces;
- transport;
- schools and colleges;
- social media and online environments;
- gangs;
- criminal exploitation;
- sexual exploitation;
- serious youth violence;
- and substance-related networks.

These matters may inform:

- referral and matching;
- the Locality Risk Assessment;
- individual Risk Assessments;
- Support Plans;
- safeguarding planning;
- and professional review.

Missing and Late Return

Each young person has an individual approach to missing risk based on factors such as:

- history;
- vulnerability;
- known associates;
- known locations;
- exploitation risk;
- and wider circumstances.

Nelson House uses 11.00pm as the usual agreed return-time expectation.

This is not a rigid universal curfew.

Different arrangements may be agreed according to:

- employment;
- education;
- family contact;
- activities;
- transport;
- assessed risk;
- and the young person's developing independence.

Where relevant, agreed arrangements are reflected in the Support Plan and/or Risk Assessment.

Returning after 11.00pm does not automatically mean that a young person is treated as missing.

A late return is not automatically treated as misconduct.

Team Members respond according to the young person's individual safeguarding and missing arrangements.

Repeated late returns, reduced contact, changing associations or missing episodes may prompt:

- discussion with the young person;
- Key Work;
- risk review;
- changes to the Support Plan or PBS;
- exploitation assessment;
- and multi-agency consideration.

When a young person returns following a missing episode or period of increased risk, Independent Horizons aims to reconnect with them without shame and understand:

- what happened;
- what risk arose;
- what the young person believes would support;
- and what may reduce future harm.

Independent Horizons supports statutory return-home arrangements and incorporates relevant learning into individual planning.

16. SUBSTANCE AND ALCOHOL USE

Independent Horizons maintains clear safety expectations around:

- alcohol;
- illegal drugs;
- smoking;
- and vaping

within Nelson House.

Detailed boundaries are set out in the relevant Expectations Agreement and service procedures.

Substance and alcohol use is approached as both:

- a safety and safeguarding issue;
- and a health and support issue.

A history of substance or alcohol use does not automatically exclude a young person from Independent Horizons.

Matching considers:

- frequency and type of use;

- level of dependence;
- intoxication risk;
- links with exploitation;
- debt;
- unsafe associates;
- impact upon behaviour or mental health;
- impact on other residents;
- and the level of support required.

Where concerns arise, support may include:

- non-judgemental Key Work;
- education;
- harm-reduction discussion;
- support to recognise triggers;
- Risk Assessment review;
- Support Plan review;
- specialist-service referral;
- safeguarding escalation where appropriate;
- and multi-agency planning.

Boundaries remain clear, while responses are intended to be proportionate and focused upon:

- safety;
- accountability;
- learning;
- and reducing harm.

Persistent or escalating substance-related risk that cannot safely be managed within supported accommodation may form part of a suitability review.

17. POSITIVE BEHAVIOUR SUPPORT, DE-ESCALATION, RESTORATIVE PRACTICE AND HOUSE EXPECTATIONS

Independent Horizons uses a relationship-based and trauma-informed Positive Behaviour Support approach.

We recognise that behaviour may communicate:

- fear;
- distress;
- shame;
- unmet need;
- frustration;
- trauma;
- intoxication;
- conflict;
- or other difficulties.

Understanding those factors does **not** excuse:

- violence;
- intimidation;
- threats;
- serious damage;

- or other harmful conduct.

Team Members maintain calm and clear boundaries while seeking to avoid:

- unnecessary power struggles;
- shame;
- humiliation;
- or avoidable escalation.

Practice prioritises:

- prevention;
- predictable relationships;
- early recognition of triggers;
- genuine choices where choice exists;
- calm communication;
- reducing unnecessary audiences or stimulation;
- allowing appropriate space;
- de-escalation;
- supporting emotional regulation;
- and returning to reflective conversation when the young person is able to engage.

Team Members must not deliberately:

- shame;
- threaten;
- humiliate;
- mock;
- discriminate against;
- or provoke young people.

House Expectations

Young people are introduced to the Nelson House Expectations Agreement through discussion rather than simply being given a form to sign.

Signing confirms that expectations have been explained, discussed and the young person understands them.

It does not:

- remove rights;
- prevent a young person from complaining;
- or mean that the young person agrees with every future decision.

A young person may disagree and their view should be recorded.

House expectations include reasonable respect for:

- personal space;
- other young people;
- Team Members;
- property;
- household safety;
- hygiene;
- and shared living.

Consequences and Restorative Work

Consequences should be:

- related;
- proportionate;
- and intended to promote learning, repair and safety.

Essential support, food, warmth, dignity, safeguarding and appropriate access to support are not withdrawn as punishment.

Where harm has occurred, restorative work may include:

- reflection;
- understanding impact;
- repair or restitution where appropriate;
- rebuilding relationships;
- identifying alternative strategies;
- and agreeing next steps.

Repeated or serious concerns may require:

- multi-agency review;
- additional risk-management arrangements;
- or police involvement where proportionate and necessary.

Police involvement is based upon the circumstances, seriousness and safety needs.

It is not used as an ordinary behavioural threat.

Independent Horizons does not use physical restraint as a routine behaviour-management method.

Any emergency physical intervention must be:

- lawful;
- necessary;
- proportionate;
- and undertaken only to prevent harm.

Any such event must be appropriately recorded, reviewed and followed up.

18. HEALTH AND EMOTIONAL WELLBEING

Independent Horizons supports young people to understand and increasingly manage their own health.

This includes:

- physical health;
- emotional wellbeing;
- mental health;
- sleep;
- nutrition;
- exercise;
- sexual health;
- substance-related health;
- dental health;
- and access to appropriate services.

Young people are supported, according to need, to:

- register with and communicate with health services;
- attend appointments;

- understand health advice;
- make informed decisions;
- access GP services;
- access dental services;
- engage with specialist services where necessary;
- build healthy routines;
- understand sexual-health and relationship information;
- and develop confidence in managing their own health as they prepare for adulthood.

Independent Horizons does not diagnose mental-health conditions or provide psychiatric or therapeutic treatment.

Where emotional or mental-health concerns arise, Team Members provide relationship-based support, listen to the young person, support them identify coping strategies and facilitate access to appropriate professionals.

Where risk increases:

- Risk Assessment;
- Support Planning;
- and the wider professional response

will be reviewed.

Emergency or specialist health needs are referred to the appropriate health service.

Clinical Adviser

The Clinical Adviser forms part of Independent Horizons' core professional consultation and support structure across all placements.

The level and nature of involvement is determined by individual need.

The Clinical Adviser may contribute through:

- reflective consultation / supervision with the Registered Service Manager, House Manager and Team Members;
- advice around emotional wellbeing;
- trauma-responsive support;
- consideration of presentation and patterns;
- contribution to Risk Assessment, PBS and Support Plan thinking where appropriate;
- advice following significant incidents or changes in presentation;
- supporting identify triggers and supportful responses;
- and supporting decisions about whether statutory or specialist services should be approached.

Direct work with an individual young person is not an automatic weekly entitlement.

Direct involvement may be agreed where:

- it is assessed as useful and appropriate;
- the young person is willing to engage;
- the purpose and boundaries are clear;
- it links with the young person's plans;
- and any additional commissioned resources are agreed where required.

The Clinical Adviser role does **not** make Nelson House:

- a clinical service;
- a therapeutic treatment setting;
- or a mental-health treatment provision.

Clinical Adviser input does not replace:

- CAMHS;
- GP services;
- crisis mental-health services;
- psychological therapy;
- psychiatric assessment;
- substance-misuse treatment;
- nursing care;
- or emergency health services.

Where specialist assessment or treatment is required, Independent Horizons supports access and works alongside the relevant professionals.

Clinical Adviser involvement may increase temporarily during a period of enhanced support and reduce again as the additional need reduces.

Any separate employment held by the Clinical Adviser within another organisation does not mean that organisation commissions, provides or endorses Independent Horizons' Clinical Adviser service.

Medication

Independent Horizons operates a graduated medication-support model in which independence is the starting principle. Independent Horizons does not automatically take control of or manage a young person's medication simply because they are looked after or live in supported accommodation.

Where a young person is assessed as fully able to:

- understand;
- store;
- and manage

their own medication safely, Independent Horizons will support them to continue doing so.

Medication arrangements are considered through:

- referral and matching;
- arrival discussions;
- the young person's existing medication arrangements;
- their wishes;
- health information;
- Risk Assessment;
- Support Planning;
- relevant professional advice;
- and ongoing review.

Graduated Medication Support

Independent Self-Management

The young person holds, stores and self-administers their medication independently where this is assessed as safe and appropriate.

Prompts and Reminders

Team Members may provide agreed:

- verbal reminders;
- alarms;

- routine prompts;
- or practical support

while the young person remains responsible for self-administration.

Supported Self-Administration

Where additional support is appropriate, Team Members may provide closer practical support or observation while the young person continues to take their own medication. This may include support where a young person is learning to measure or manage medication safely, including when medication is first introduced or changed.

Medication Assessment and Review

Relevant considerations may include:

- the young person's understanding of their medication;
- ability to follow the prescribed regime;
- ability to store medication safely;
- overdose or self-harm risk;
- misuse;
- diversion;
- controlled or higher-risk medication;
- special storage requirements;
- ability to manage supplies and repeat prescriptions;
- and changes in presentation or risk.

Medication arrangements are reviewed where circumstances change, including where relevant following:

- new medication;
- dose changes;
- medication error;
- repeated missed doses;
- repeated refusal;
- overdose concern;
- misuse or diversion;
- significant incidents;
- or changes in health or emotional presentation.

Recording

Recording is proportionate to the level of Independent Horizons involvement.

A young person who independently manages their own medication does not automatically require a MAR entry for every dose.

Where Team Members:

- prompt;
- observe self-administration;
- receive medication;
- store medication;
- return medication;
- or identify a medication concern,

that involvement will be appropriately recorded.

Where a Team Member actually administers medication, a MAR or equivalent formal medication-administration record will be used.

Medication errors, significant refusal, missed doses, hoarding, diversion or other concerns will be recorded and escalated through the appropriate:

- health;
- management;
- incident;
- or safeguarding route

according to the circumstances.

Higher-risk or controlled medication will be subject to additional safeguards based upon:

- individual assessment;
- professional advice;
- safe storage;
- appropriate record keeping;
- and the risks associated with the particular medication.

Preparation for Adulthood

Medication support may include supporting a young person learn to:

- understand what their medicines are for;
- understand labels and prescribed regimes;
- store medication safely;
- remember doses;
- recognise when supplies are running low;
- request repeat prescriptions;
- collect medication;
- communicate with GP and pharmacy services;
- arrange medication reviews;
- recognise side effects or concerns;
- and manage medication safely away from Nelson House.

If a young person persistently requires complete Team Member management of medication and cannot safely maintain or develop meaningful independence in this area despite appropriate support, Independent Horizons will review with the placing authority whether supported accommodation remains appropriate.

19. EDUCATION, EMPLOYMENT AND TRAINING

Independent Horizons promotes high aspirations.

Young people are supported to access and sustain education, employment or training according to their:

- abilities;
- interests;
- wishes;
- and plans.

Support may include:

- college or course applications;
- attendance and routines;

- communication with education providers;
- study organisation;
- access to appropriate IT and quiet study space;
- CV preparation;
- job searches;
- job applications;
- interview preparation;
- work-readiness skills;
- volunteering;
- apprenticeships;
- and work experience.

Education, employment and training goals form part of the Support Plan where relevant.

Those goals should reflect the young person's aspirations rather than simply the availability of local provision.

Where a young person is not engaged in education, employment or training, Team Members work with the young person and professional network to:

- understand barriers;
- explore interests;
- identify realistic opportunities;
- and agree practical next steps.

Independent Horizons will professionally challenge drift or insufficient planning where this adversely affects the young person's opportunities.

20. FAMILY, FRIENDS AND IMPORTANT RELATIONSHIPS

Independent Horizons recognises that relationships and natural support networks are important to:

- identity;
- wellbeing;
- belonging;
- and transition to adulthood.

Young people are supported to maintain or rebuild safe relationships with:

- family;
- friends;
- previous carers;
- and other important people

where this is consistent with their wishes, plans and welfare.

Contact and visitor arrangements are individualised.

Decisions may take account of:

- the young person's wishes;
- statutory plans;
- delegated authority;
- safeguarding concerns;
- compatibility with other residents;
- privacy;
- prohibited or risky contacts;

- and reasonable household security.

Independent Horizons does not use a blanket rule that all relationships require approval simply because the young person lives in supported accommodation.

Young people are supported to think about:

- healthy relationships;
- boundaries;
- consent;
- respectful communication;
- conflict;
- online relationships;
- exploitation;
- and trusted adults.

Where appropriate and wanted by the young person, family or other important people may contribute to support and transition planning.

21. EQUALITY, IDENTITY, CULTURE, RELIGION AND COMMUNICATION

Independent Horizons is committed to anti-discriminatory and inclusive practice.

Young people are treated fairly and with dignity regardless of protected characteristic, background, identity or circumstance.

Support is responsive to individual differences including:

- disability;
- race and ethnicity;
- sex;
- gender identity and expression;
- sexual orientation;
- religion or belief;
- culture;
- language;
- communication needs;
- neurodiversity;
- family history;
- and other aspects of identity that are important to the young person.

Young people are supported to practise faith and cultural traditions where they wish to do so.

Individual planning may consider:

- dietary requirements;
- cultural observance;
- religious observance;
- clothing;
- prayer;
- community connections;
- and identity needs.

Where a young person requires interpreting, translation or other communication assistance, Independent Horizons will work with the relevant authority or service to facilitate appropriate access.

Young people should receive important information in a form they can understand.

Reasonable adjustments are considered individually.

Discriminatory, racist, homophobic, transphobic, ableist, sexist or otherwise degrading behaviour will be challenged appropriately while maintaining a learning and restorative approach where possible.

22. YOUNG PEOPLE'S RIGHTS, ENTITLEMENTS, VOICE AND PARTICIPATION

Young people are informed of their rights and entitlements when they arrive and throughout their time at Nelson House.

This is not treated as a one-off induction task.

Young people are entitled to expect:

- safe and suitable accommodation;
- dignity and respect;
- privacy;
- individual support;
- involvement in decisions affecting them;
- appropriate safeguarding;
- support to develop independence;
- support to access health services;
- support with education, employment and training;
- support with important relationships where appropriate;
- information about their rights;
- access to advocacy;
- the ability to raise concerns and complaints without retaliation;
- and access to information and records about them in accordance with the relevant legal and policy framework.

Understanding and Accessing Entitlements

Throughout their placement, Independent Horizons supports each young person to understand what they can expect from supported accommodation and the entitlements relevant to their individual circumstances.

This includes their entitlement to education and, where applicable, the entitlements available to them as a looked-after child or care leaver.

Information about entitlements is explained in a way the young person can understand and is revisited as their circumstances, plans and level of independence change.

Where a young person requires support to access an entitlement, Independent Horizons will support them to do so and will work with the responsible professional or authority where necessary.

The longer-term aim is for young people to become increasingly able to understand, identify and access their own entitlements as they prepare for adulthood.

Young Person's Guide

Each young person is provided with the Independent Horizons Young Person's Guide before or upon their arrival at Nelson House in a format that is accessible to them.

The Guide provides information about:

- Nelson House and the accommodation provided;
- the support available;

- rights and entitlements;
- important people and contact information;
- advocacy and independent advocacy arrangements;
- how to make a complaint or representation and how this will be dealt with;
- and relevant services, facilities and support relating to cultural difference, disability or other individual need.

The Guide is discussed with the young person rather than simply being handed to them.

The Young Person's Guide is kept under review, and young people's comments and views are sought before revisions are made.

Information from the Guide is reinforced throughout the placement through Key Work, Support Plan reviews, ordinary discussion and other opportunities appropriate to the young person.

Voice and Participation

Young people's views should be visible in:

- Support Plans;
- Risk Assessments;
- PBS;
- Key Work;
- reviews;
- incident follow-up;
- move-on planning;
- and service feedback.

Young people may disagree with adults.

Their disagreement should be recorded accurately rather than converted into apparent agreement.

Participation is embedded within everyday practice and governance and does not depend upon a young person participating in a formal group.

Young people may influence:

- their own support;
- house routines;
- shared expectations;
- activities;
- independence work;
- complaints and feedback arrangements;
- changes that affect their home;
- service development;
- policy review where appropriate;
- and the Regulation 32 quality review.

A suggestion route is available as one option for feedback.

Young-person voice is also gathered through ordinary conversations, Key Work, Support Plan reviews, house discussions, complaints, compliments, feedback opportunities and direct discussion with managers.

23. COMPLAINTS, ADVOCACY AND INDEPENDENT ROUTES

Young people have the right to complain without fear of:

- disadvantage;

- withdrawal of support;
- punishment;
- or retaliation.

Complaints may be made verbally or in writing.

A young person may raise a concern or complaint with:

- any Team Member;
- Michael Robinson as House Manager;
- Karen Burton as Complaints Manager where she is not conflicted;
- their social worker;
- their placing/accommodating authority;
- an advocate;
- or another appropriate professional.

The Complaints Policy/Procedure explains the full process and can be obtained from Independent Horizons.

Karen Burton remains Complaints Manager for ordinary complaints where:

- she is not the subject of the complaint;
- and there is no actual or perceived conflict of interest.

Where a complaint concerns Karen Burton, Gary Burton or another matter involving an actual or perceived conflict, the person complained about must take no part in:

- considering;
- investigating;
- deciding;
- or quality-assuring

the complaint, except for any limited informal-resolution involvement that is lawful and appropriate.

A complaint about Karen must bypass Karen.

A complaint about Gary must not be managed by Karen because of their relationship and the recognised conflict of interest.

Where both Directors are implicated, both are excluded from consideration and decision-making.

Michael Robinson may:

- receive a complaint;
- support secure immediate safety;
- preserve relevant information;
- and ensure the concern reaches the correct route.

He is not the default independent investigator of a complaint concerning a Director.

Where independent oversight is required, Independent Horizons will arrange for the matter to be considered or investigated by an appropriately experienced and genuinely independent external professional, such as an Independent Social Worker.

The current independent professional and live contact details are maintained within the Complaints Procedure and Young Person's Guide so that the governance system does not depend permanently upon one named individual.

Young people will be supported to access independent advocacy.

Complaints and Safeguarding Allegations

A complaint does not automatically become a LADO matter.

Where a complaint contains an allegation about an adult working with children that meets or may meet the relevant threshold, Independent Horizons will follow the allegations procedure and appropriate statutory safeguarding route.

Where a safeguarding concern does not relate to the conduct or suitability of an adult working with children, the response may instead involve:

- Children's Social Care;
- police;
- health;
- the placing authority;
- or another appropriate safeguarding service.

Where a complaint and safeguarding matter overlap, safeguarding action takes priority.

The complaint will remain appropriately recorded and concluded through the complaints process when appropriate.

24. RECORDING, INFORMATION SHARING AND CONFIDENTIALITY

Independent Horizons uses **LEIF** as its principal young-person case-management and recording system.

Recordings are:

- timely;
- factual;
- proportionate;
- respectful;
- young-person-centred;
- clear about the source of information;
- and useful to future understanding of the young person's life and support.

Records should distinguish, where relevant, between:

- fact;
- Team Member observation;
- third-party information;
- professional analysis;
- and the young person's own account.

Young people's:

- strengths;
- achievements;
- aspirations;
- and progress

should be visible alongside concerns and risks.

Significant events must be recorded in the appropriate specialist records rather than relying solely upon general daily notes.

Where relevant, links should be made between:

- incidents;
- safeguarding records;
- de-escalation records;
- missing records;

- Risk Assessments;
- PBS;
- Support Plans;
- Key Work;
- ILS;
- and management oversight.

Young people should be able, with appropriate support, to:

- understand records about them;
- contribute their views;
- and challenge information where they believe it is inaccurate.

Information is stored securely and access is restricted according to role and need.

Confidentiality is respected but is not absolute.

Information may be shared where necessary and lawful to:

- safeguard the young person;
- safeguard another person;
- support effective planning;
- fulfil statutory responsibilities;
- or meet regulatory requirements.

Where appropriate and safe, young people will be told:

- what information is being shared;
- with whom;
- and why.

Information about one young person must not be unnecessarily disclosed to another young person.

25. PLACEMENT STABILITY, CHANGING NEEDS, MOVE-ON AND PLACEMENT ENDINGS

Placement stability is a service-wide responsibility.

Independent Horizons recognises that young people may experience difficulty:

- after moving in;
- following significant life events;
- during changes in relationships;
- during changes in mental health;
- or during other periods of instability.

An increase in:

- risk;
- emotional distress;
- behavioural difficulty;
- or support need

does **not automatically mean that the placement should end.**

Where it remains safe and appropriate, Independent Horizons will first consider proportionate measures such as:

- increased relationship-based support;
- additional planned individual-support hours;

- enhanced management oversight;
- additional Key Work;
- additional ILS;
- Risk Assessment review;
- PBS review;
- Support Plan review;
- Clinical Adviser consultation;
- specialist referral;
- increased multi-agency coordination;
- and formal enhanced support with a Step-Down Plan.

Independent Horizons cannot guarantee that every placement can always be maintained.

Where:

- risks cannot reasonably be made safe;
- or needs become persistently incompatible with supported accommodation,

Independent Horizons will request an urgent multi-agency suitability review.

The review will consider:

- the young person's views;
- current needs and risks;
- what support has already been tried;
- whether further proportionate support may stabilise the placement;
- the impact on other residents;
- service boundaries;
- and what alternative provision may be required if Nelson House is no longer appropriate.

Planned Move-On

Preparation for move-on begins once the young person is settled at Nelson House and meaningful discussion about their future can take place. Planning develops in line with the young person's age, needs, statutory plan, level of independence, housing pathway and anticipated transition arrangements.

Independent Horizons works with the young person, placing authority and relevant professionals around:

- future accommodation;
- tenancy skills;
- budgeting;
- household management;
- local services;
- education, employment and training;
- health;
- medication;
- relationships;
- practical arrangements;
- and emotional preparation for leaving.

Where a young person remains beyond their 18th birthday as a transitional arrangement, there must be a clear move-on plan agreed with the relevant placing/accommodating authority. The length of any transitional continuation will be individually planned and kept under review, taking

account of the young person's interests, safeguarding, compatibility with other residents and the agreed transition arrangements.

Placement Endings

Where an ending is planned, Independent Horizons seeks to provide:

- clarity;
- time for preparation;
- appropriate information sharing;
- practical support;
- and a respectful ending.

Where an ending becomes urgent or unplanned, the young person's safety and welfare remain central.

Independent Horizons will work with the placing authority to achieve the safest transition reasonably possible and provide relevant information to the receiving provision.

Placement ending must not be used as an ordinary behavioural threat.

Former young people may, where appropriate, contact Independent Horizons for proportionate:

- advice;
- encouragement;
- and signposting

after move-on.

This does not replace the statutory leaving-care responsibilities of the relevant local authority and does not create an indefinite support entitlement.

26. MULTI-AGENCY WORKING AND PROFESSIONAL CHALLENGE

Independent Horizons works in partnership with the young person's professional network.

This may include:

- social workers;
- personal advisers;
- Independent Reviewing Officers;
- Youth Justice Services;
- education providers;
- Virtual School services;
- health professionals;
- substance-misuse services;
- police;
- exploitation and missing services;
- housing providers;
- advocates;
- and other relevant professionals.

Independent Horizons will:

- attend and contribute to relevant meetings;
- share appropriate information;
- implement agreed actions;
- seek clarification where roles are unclear;
- and participate actively in planning.

Multi-agency working is not simply passive compliance.

Where Independent Horizons believes that:

- an important need is not being met;
- agreed support is not being delivered;
- professional drift is occurring;
- a statutory plan is insufficient;
- another service is not responding;
- risk is escalating;
- or a decision is not in the young person's interests,

the matter will be raised with the responsible professional or authority and escalated appropriately where required.

Young people should, where appropriate, know what professionals are discussing about them and be supported to participate in those discussions and meetings.

27. WORKFORCE DEVELOPMENT, SUPERVISION AND TRAINING

Independent Horizons recruits Team Members through safer-recruitment processes and expects them to have the:

- values;
- suitability;
- skills;
- experience;
- and capacity

required to support young people safely.

The detailed workforce structure, named workforce, qualifications, training and development arrangements are maintained within the Workforce Development Plan.

Induction and Development

Team Members receive induction and development appropriate to their role and the needs of the young people supported.

Training and development may include:

- safeguarding;
- exploitation;
- missing;
- trauma-responsive practice;
- PBS;
- de-escalation;
- health;
- mental-health awareness;
- equality, diversity and inclusion;
- substance use;
- recording;
- Risk Assessment;
- Support Planning;
- professional boundaries;
- lone working;
- health and safety;

- fire safety;
- and other needs identified through referrals, supervision or service learning.

Training should contribute to improved practice rather than exist solely as completed certificates.

Formal Reflective Supervision

Independent Horizons has chosen monthly formal, recorded reflective supervision as its minimum routine standard.

This monthly frequency is an Independent Horizons governance standard.

It is not described as a statutory monthly requirement.

All regularly employed Team Members receive formal reflective supervision at least once each month.

Additional supervision or management discussion will be provided sooner where circumstances require it.

Supervision considers, where relevant:

- young people's experiences and views;
- safeguarding;
- risk;
- professional boundaries;
- significant events;
- reflective learning;
- recording quality;
- Support Plans;
- Risk Assessments;
- PBS;
- Key Work;
- ILS;
- Team Member wellbeing;
- performance;
- strengths;
- areas for development;
- training needs;
- actions from previous supervision;
- complaints;
- and conflicts affecting practice.

New Team Members also receive additional management check-ins during induction and probation where appropriate.

Probation reviews, informal check-ins, incident debriefs and Team meetings supplement formal supervision and do not replace it.

Michael Robinson, as House Manager, receives formal recorded reflective supervision from Karen Burton at least monthly.

Registered Service Manager Supervision

Karen Burton, as Registered Service Manager, maintains independent professional supervision at least monthly.

This provides independent reflection around:

- regulatory decision-making;

- safeguarding;
- complex placement decisions;
- leadership and management pressures;
- professional boundaries;
- complaints and allegations;
- conflicts of interest;
- service development;
- professional development;
- and wellbeing.

Additional independent supervision may be arranged sooner following:

- a significant safeguarding event;
- allegation;
- difficult placement decision;
- regulatory concern;
- or another matter requiring independent professional reflection.

28. QUALITY ASSURANCE, MANAGEMENT OVERSIGHT AND REGULATION 32

Independent Horizons uses management oversight and quality assurance to understand whether processes are being followed, whether the service is safe, whether support remains suitable and whether support is making a positive difference to young people.

Quality assurance may draw upon evidence including:

- young-person feedback;
- complaints and compliments;
- Support Plan progress;
- Risk Assessments;
- incidents;
- safeguarding;
- missing episodes;
- Key Work;
- ILS;
- education, employment and training;
- health and wellbeing;
- placement stability;
- recording audits;
- Team supervision;
- training;
- recruitment;
- policy compliance;
- premises and safety;
- professional feedback;
- and regulatory learning.

Management reviews patterns and themes so that service improvement is based upon evidence rather than assumption.

The Registered Service Manager maintains oversight of significant safeguarding, incidents, complaints, placement stability, risk, workforce matters and other relevant areas of service quality.

Independent Horizons also undertakes monthly internal governance and assurance activity as a chosen service-management practice.

This is separate from the statutory Regulation 32 review.

Regulation 32

Independent Horizons maintains a system for monitoring and improving the quality of support provided by the service and completes a formal Quality of Support Review at least once every six months in accordance with Regulation 32.

Independent Horizons holds a monthly internal governance and quality assurance meeting involving Karen Burton, Gary Burton and Michael Robinson. This is an Independent Horizons management arrangement and is separate from the statutory Regulation 32 review. Relevant themes, learning and evidence from this monthly governance activity may inform the six-monthly Regulation 32 Quality of Support Review.

The review considers the quality and impact of the accommodation and support provided and takes account of relevant evidence, including:

- the views of young people, including feedback and complaints;
- feedback from individual young people about the impact of the accommodation and support on their lives;
- where relevant, young people's views about how prepared they felt for moving into supported accommodation and how prepared they feel for moving on;
- feedback from each young person's accommodating authority;
- feedback from Team Members and other relevant people;
- service outcomes;
- safeguarding and significant incidents;
- complaints;
- placement stability;
- workforce evidence;
- and relevant research, guidance and developments concerning how young people's needs are best met.

Following each review, Independent Horizons produces a written report setting out the findings and the actions it intends to take as a result.

A copy of the completed report is provided to Ofsted within 28 days beginning with the day on which the report is completed. A copy is made available on request to each young person's accommodating authority.

Young people are supported to contribute meaningfully to the quality review.

Regulation 32 findings are used to identify strengths, areas for improvement, actions, responsible people and timescales.

Quality assurance distinguishes between the absence of recorded activity, completion of a process and actual evidence that a positive outcome or improvement has occurred.

29. ACCESS TO POLICIES AND KEY INFORMATION

Independent Horizons maintains controlled policies, procedures and guidance addressing the principal areas of service operation.

These include areas such as:

- safeguarding and child protection;
- missing young people;
- exploitation;

- complaints;
- Positive Behaviour Support and behaviour management;
- equality and diversity;
- health and wellbeing;
- substance and alcohol use;
- whistleblowing;
- health and safety;
- fire safety;
- surveillance and privacy;
- data protection;
- recruitment;
- workforce practice;
- and other governance areas relevant to supported accommodation.

For the purposes of the Supported Accommodation (England) Regulations 2023, Independent Horizons' child-protection policies include:

- the Safeguarding Policy;
- the Missing Child / Missing Young Person Policy;
- and the Behaviour Management / Positive Behaviour Support Policy.

Where a person involved in the support or protection of a young person requires access to these policies, they may request them from the Registered Service Manager or House Manager. An electronic or printed copy will be provided as appropriate.

Young people are introduced to policies and information that affect them in accessible language rather than being expected to understand technical organisational procedures without support.

The Young Person's Guide provides practical information about Nelson House, the support available, rights and entitlements, key people, complaints, advocacy, emergency and professional contacts and how to raise concerns.

Young people may ask a Team Member or manager for an explanation of a policy, access to relevant information or a copy of a relevant policy where appropriate.

A current copy of the Complaints Policy/Procedure can be requested from the Registered Service Manager, the House Manager or another Team Member, who will ensure that it is provided.

The medication service model is set out in section 18.2 of this Statement. Detailed medication arrangements are supported by Independent Horizons' controlled operational procedures and records.

30. REVIEW, REVISION, AVAILABILITY AND NOTIFICATION OF THE STATEMENT OF PURPOSE

This Statement of Purpose is kept under review so that it accurately describes the service actually being provided.

Review may be triggered by:

- regulatory change;
- changes to Ofsted guidance;
- inspection learning;
- significant safeguarding learning;
- significant service learning;
- changes to the service model;
- change of registered or key management persons;

- material workforce changes affecting the structure described in this Statement;
- significant changes to Nelson House;
- young-person feedback;
- professional feedback;
- Regulation 32 findings;
- complaints;
- or evidence that practice no longer aligns with this Statement.

Young people should be informed about relevant changes in a way they can understand and should have opportunities to give their views where changes affect their experience.

This Statement is provided to Ofsted and made available on request in accordance with Regulation 9 to relevant people including:

- Team Members of the supported-accommodation undertaking;
- a young person living in the service;
- a young person for whom the service is being considered;
- a parent of a current or prospective young person;
- and the young person's accommodating authority.

The Registered Person will:

- keep this Statement under review;
- revise it where appropriate;
- notify Ofsted of revisions;
- and provide a revised copy to Ofsted within 28 days of the revision.

Independent Horizons will operate consistently with:

- this approved Statement of Purpose;
- its registration conditions;
- and the applicable regulatory framework.

The Registered Service Manager is responsible for ensuring that practice, policy, workforce arrangements and service descriptions remain consistent with the approved Statement.

Where another Independent Horizons controlled document becomes inconsistent with this Statement following an approved service decision or regulatory change, the inconsistency will be identified through document control and the affected document will be reviewed.