Financial Framework for the Expanded Troubled Families Programme
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Introduction

In April 2012, the Government launched the Troubled Families Programme: a £448 million scheme to incentivise local authorities and their partners to turn around the lives of 120,000 troubled families by May 2015. The first programme worked with families where children were not attending school, young people were committing crime, families were involved in anti-social behaviour and adults were out of work.

In June 2013, the Government announced plans to expand the Troubled Families Programme for a further five years from 2015/16 and to reach up to an additional 400,000 families across England. £200 million has been committed to fund the first year of this proposed five year programme.¹ This increased investment is testament to the Government’s ongoing commitment to improve the lives of troubled families and as this work is taken to a significantly greater scale, to transform local public services and reduce costs for the long-term.

The Government announced in the Budget 2014 that it would offer the highest performing areas (those that have ‘turned around’² the lives of the most families in the current programme) the opportunity to start delivery of the new expanded Troubled Families Programme early – during 2014/15. Fifty-one such areas signed up to be part of the first wave of ‘early starter’ areas in September 2014 and a further sixty-two areas formed a second wave in January 2015. These areas have been working intensively with Department for Communities and Local Government’s (DCLG) Troubled Families Team to implement and refine the operating model for the national roll out of the new, expanded Troubled Families Programme.

The national roll out of the new programme begins in April 2015. Areas who are not already ‘early starters’ will be invited to join the programme on the basis of the volume of results they have claimed under the first programme by the end of February 2015. To be eligible, areas must turn around at least three-quarters of the families they committed to support in the first programme. The eligibility of any remaining areas will be determined following the May 2015 General Election and further details will be communicated to relevant upper-tier local authority Chief Executives at this point.

The Troubled Families Team published an interim version of this Financial Framework in September 2014 and sought feedback from the early starter areas and other government departments. This was followed by a series of thematic workshops with areas to discuss the identification indicators in more depth and begin conversations about appropriate outcomes. The Team then issued a revised Financial Framework in November 2014 to

¹ The remaining funding commitment will be determined as part of the next Spending Round process.
reflect as much of this feedback as possible and provide the terms on which the expanded Troubled Families Programme will operate for the remainder of 2014/15.

Since November 2015, the joint work with the ‘early starter’ areas and other government departments has continued. In particular, these discussions have focused on the local development of Troubled Families Outcomes Plans and the design of the programme’s national evaluation. This Financial Framework reflects this learning and provides the terms on which all local authorities will be asked to operate for the financial year 2015/16. Subject to the conclusions of a 2015 Spending Round process, the terms of this Financial Framework may be revised further.
Shared Commitments

Building on the relationships formed with local areas through the first Troubled Families Programme and with ‘early starter’ areas for the new programme, the Troubled Families Team will continue to work collaboratively with upper-tier local authorities and their partner agencies. This relationship between central and local government is critical to the programme’s success and is based on a series of commitments made and fulfilled by both parties.

Importantly, while the expanded Troubled Families Programme will continue to operate a payment by results funding model, this is far from a purely financially transactional relationship. On the contrary, this programme is based on a common interest and ambition to transform the lives of this country’s troubled families, to improve the services that work with them and to ensure more efficient and effective use of public money for the long-term.

On this basis, as part of the sign up process for the new Troubled Families Programme, all upper-tier local authority Chief Executives will be asked to sign up to a number of key commitments. These include the following:

- To achieve significant and sustained progress\(^3\) with an agreed total number of families over the 5 year period from 2015/16.

- To engage with an agreed number of families in the first year of the programme (2015/16). The local authority will receive upfront attachment fees in 2015/16 for this number of families.

- To integrate and transform local public services, evidenced through participation in the programme’s National Impact Study, the submission of Family Progress Data and completion of the programme’s Costs Savings Calculator. The local authority will received a Service Transformation Grant, weighted towards their total number of families, to support this work.

Further detail relating to all of these commitments is provided in this Financial Framework.

Adherence to the above commitments for the new programme may be taken into consideration when decisions are taken about funding beyond 2015/16; payments may be reviewed and reduced or withheld if commitments are not fulfilled.

In return, the DCLG Troubled Families Team commits to offer local authorities the following:

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\(^3\) Or ‘continuous employment’ results
• The freedom and flexibility to prioritise the families of greatest concern to them and their partners locally, on the basis of cost and the potential benefits of an integrated whole family approach.

• The freedom and flexibility to design their own results framework (a Troubled Families Outcomes Plan), reflecting their local service transformation priorities and based on the principles laid out in this Financial Framework.

• Upfront attachment fees for an agreed number of families in 2015/16 and a results payment for all families with whom they either achieve significant and sustained progress or move into continuous employment.

• Increased provision of local analysis and evidence back to local authorities from the national evaluation, offered earlier in the programme and more frequently. This evidence will give local authorities improved information about the problems families face on entry to the programme, the impact of their local delivery on families and the fiscal benefits being achieved. This data and analysis will inform ongoing service transformation, investment decisions and workforce development.

• A streamlined system for the collection and submission of information for the evaluation and for making results claims.

• Constructive support and challenge from the central team, based on shared learning and experiences across local authorities and their partners.

• Ongoing work across government and with key delivery partners (e.g. the police, NHS England and Public Health England) to promote more effective information sharing and service integration.
Identifying Families

The first Troubled Families Programme led the way for the first systematic identification of families with multiple problems across England. Although faced with data sharing, partnership working and service development challenges, by the end of 2014 the programme had worked with nearly all 120,000 troubled families of whom 85,000 were already ‘turned around’. This is a major achievement upon which the new programme will build.

The new Troubled Families Programme will retain the first programme’s focus on families with multiple high cost problems and will continue to include families affected by poor school attendance, youth crime, anti-social behaviour and unemployment. However, it will also reach out to families with a broader range of problems.

The inclusion of families into the programme will be based upon a cluster of six headline problems. Below these problems sits a basket of indicators, suggested referral routes and information sources, which should be used to identify families with these problems. While the headline family problems on which the programme focuses are unlikely to change significantly, the indicators and information sources underneath are designed to be flexible and can be updated over the course of the programme’s proposed five year life.

To be eligible for the expanded programme, each family must have at least two of the following six problems:

1. Parents or children involved in crime or anti-social behaviour.
2. Children who have not been attending school regularly.
3. Children who need help: children of all ages, who need help, are identified as in need or are subject to a Child Protection Plan.
4. Adults out of work or at risk of financial exclusion or young people at risk of worklessness.
5. Families affected by domestic violence and abuse.
6. Parents or children with a range of health problems.

While families may be identified as eligible for the programme on the basis of two problems, the information available at the point of identification may not reflect the entirety of each family’s complexity of problems. Some problems, such as domestic violence or mental illness, may be hidden from public services until work begins with the family and the full extent of their needs is uncovered. In the first Troubled Families Programme families who met three eligibility criteria were found, on average, to actually have nine significant
problems on entry to the programme. The new Troubled Families Programme remains a programme for families with multiple, high cost problems, although the profile and extent of these problems may differ from those of families supported by the first programme.

The formula for identifying families allows for a level of discretion which should be exercised reasonably. Local authorities should identify families across all six problems and ensure the programme’s resources are being used to best effect. Families should be prioritised for inclusion in the programme on the basis of the following:

- They are families with multiple problems who are most likely to benefit from an integrated, whole family approach; and
- They are families who are the highest cost to the public purse.

While the detail of this prioritisation should be agreed locally, the periodic collection and publication of evidence collated via the programme’s National Impact Study, the submission of Family Progress Data and the completion of the Cost Savings Calculator for every local area will provide a form of accountability. These will show the types of families and problems that areas are prioritising. The Troubled Families Team will also consider this information as part of the programme’s ongoing ‘spot check’ processes.

The first group of ‘early starter’ local authorities began delivery of the expanded programme on 1 September 2014 and the second group began on 1 January 2015. For these areas, families who meet the eligibility criteria for the programme from these dates onwards may be considered as part of each area’s delivery commitments, irrespective of whether they were already receiving a targeted family intervention. However, no results may be claimed for successes achieved with families prior to these dates.

Local authorities who are eligible for the programme on the basis of results claimed in January/February 2015, will start delivery of the expanded programme on 1 April 2015. In these areas, families who meet the eligibility criteria for the programme from this date onwards may similarly be considered as part of each area’s delivery commitments, irrespective of whether they were already receiving a targeted family intervention. However, no results may be claimed for successes achieved with families prior to this date.

Annex A provides further information on the principles underpinning the identification process. Annex B provides more detail on the indicators and suggested information sources underpinning each of the headline problems. Annex G provides details on some of the data sharing arrangements and this will be updated over the lifetime of the programme to reflect the latest information, advice and best practice.

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5 See Annex E for further information.
Measuring Success

The new Troubled Families Programme has ambitious service transformation goals and therefore differs from the first programme in how it will measure, and pay for success. Rather than focusing on a small number of relatively tightly defined national results to be achieved with each family it asks upper-tier local authorities and their partners to measure success in three main ways for which funding is available:

1. Firstly, by demonstrating either **significant and sustained progress** or **continuous employment** with an agreed number of families in their area’s share of the estimated national total of 400,000 families. Each family’s achievement of ‘significant and sustained’ progress will be assessed against a locally defined Troubled Family Outcomes Plan. This will provide a new, more flexible approach to measuring results. See Annex D for more detail. The Troubled Families Team will share examples and further guidance on the development of Troubled Families Outcomes Plans throughout the programme.

   Funding is available for each family who achieves success and will be paid in two parts: an upfront attachment fee of £1,000 per family and a results-based payment of £800 per family.

   Attachment fees will be paid upfront for engagement with an agreed number of families in 2015/16. If a family disengages before success has been claimed, this family must be replaced by another eligible family in order to ensure the local authority’s overall commitments are met. No further attachment fee will be paid for this replacement family.

   Payments of attachment fees will be made in the first quarter of 2015/16, subject to the local authority’s acceptance of the proposed sign up commitments.

2. Secondly, by capturing a much richer understanding of the profile of families being engaged in their local area and progress across a broader range of outcomes. This will be achieved from 2015/16 through the collection and publication of data obtained via all areas’ participation in the programme’s **National Impact Study** and supplemented by **Family Progress Data** (a much streamlined data set replacing the Family Monitoring Data which was collected in the first programme). See Annex E for more detail.

3. Finally, by demonstrating the financial benefits that their programme achieves for local services in a transparent way that will support and stimulate service integration and transformation. In the first programme, all upper-tier local authorities were asked to complete the online troubled families **Cost Savings Calculator**. For the new programme, the content and functionality of the Cost Savings Calculator has been...
significantly improved and the majority of the fiscal benefits information will now be taken from the National Impact Study and local Family Progress Data, greatly reducing the administrative burden and enhancing the robustness of the evidence on fiscal benefits that it produces. The main requirement on local authorities will continue to be in regard to the provision of information about local investment in their Troubled Families Programme together with comparative (pre-programme) ‘business as usual’ costs.

Funding to support the collection, analysis and publication of the information outlined in 2 and 3 above is provided within the programme’s Service Transformation Grant (STG); this forms an essential part of the new programme’s increased focus on driving public service transformation across all relevant local services. Where an authority is eligible to participate in the new programme, STG payments will be made in the first quarter of 2015/16. Satisfactory compliance with requirements to provide Family Progress Data, to participate in the National Impact Study and to complete the Costs Savings Calculator may be taken into account when decisions are taken about the funding individual local authorities receive beyond 2015/16.

Verification and Validation of Results

It is important that each local authority puts in place robust results verification and validation systems. Learning from the first Troubled Families Programme suggests that those areas that invested early on in good local data management and in analytical resources found this very beneficial. To deliver the increased evidential expectations of the new programme, most areas will need to at least retain (and most likely increase) this resource.

As per the first programme, results should be claimed under the powers of the local authority’s Chief Executive. The local authority’s Internal Audit service should check and verify at least a representative sample of results for each claim before it is made. Internal Audit should refer to the area’s Troubled Family Outcomes Plan (see Annex D) and we recommend that they are consulted during the development of that plan.

Alongside its work with ‘early starter’ local authorities, the Troubled Families Team has been working with a group of their Internal Auditors to consider best practice approaches for their engagement with the new programme. As a result, these Internal Auditors have developed and agreed a set of guiding principles for Internal Auditors and Troubled Families Coordinators to consider (see Annex H).

The opportunity to claim results will normally be offered on a six monthly basis. As 2015/16 is a transitional year between the first programme and the new one, however, it will contain 3 ‘claims windows’; these will be in May and September 2015 and January 2016.

Results should only be claimed once a Troubled Families Outcomes Plan is in place and has been shared with the area’s Internal Auditors as part of their sign off process.
As with the current programme, there will be regular ‘spot checks’ of a sample of local authorities’ claims for payment. The new spot check process will have particular reference to local authorities’ Troubled Family Outcomes Plans. Further details on the approach to spot checks will be made available early in 2015/16. [see Annex D for our principles on success measures]
Annex A - Principles for Identifying Families

Three key principles underpin the new programme’s approach to the identification of troubled families. These reflect the programme’s broader policy objectives:

1. The programme aims to improve outcomes for children and intervene earlier in families with problems; all eligible families must include dependent children.\(^6\)

2. To identify the estimated 400,000 troubled families across England, we expect all local authorities to identify families from across all six headline problems. The scale of the programme means that a narrower focus would make it impossible to identify all the families this programme aims to reach. If a local authority and its partners identify more families than their agreed total number then families should be prioritised on the basis of need and those with more than two problems should be offered support first.

3. The programme is designed for families with multiple problems who will benefit from an integrated and whole family approach. Individual family members, of course, could well be assessed as having more than one of the programme’s six headline problems (as listed on p10 and 11). Multiple problems in one family member will satisfy the eligibility requirements except where that individual is not living in the family home; in such circumstances the problems that family member has will only count as one of the minimum two problems needed to satisfy the eligibility criteria. For example, a father with parenting responsibilities leaving prison who will live apart from his children may only account for one of the problems that deems a family eligible, even if he has multiple problems. There would need to be at least one other member of the family who has at least one of the other headline problems targeted by the programme for the family to be eligible.

The level of discretion that this formula allows local areas in regard to the identification of families should be used reasonably. Local authorities need to be satisfied that the programme’s resources are being used for families who will most benefit from an integrated, whole-family approach to their problems and that the highest cost families are being prioritised for support.

There will not be a sign off process if local authorities look to introduce new or different indicators under any of the six problems as this is intended to be a locally responsive and flexible model. However, to ensure best practice examples are shared and the list of indicators provided to local authorities is up to date, local authorities are asked to inform the Troubled Families Team if they would like to use new or different indicators or information sources.

\(^6\) For the purposes of the programme, a dependent child is a person aged 0-15 in a household or aged 16-18 in full-time education, in training or unemployed and living in a family with his or her parent(s).
Annex B - Indicators and Referral Routes to Assist in the Identification of Families

Parents or children involved in crime or antisocial behaviour.

The Troubled Families Programme works with families who have significant problems and with some families who also cause problems. The first programme’s focus on youth crime and anti-social behaviour across the family has enabled local areas to reach families whose problems span not only behavioural issues, but are also strongly related to wider family issues such as substance misuse, domestic violence and mental illness. Many areas have also used these criteria as a basis on which to build strong partnerships with local criminal justice and housing services and the new programme should help make this the norm.

The new programme retains the first programme’s youth crime and anti-social behaviour criteria but broadens the reach to include families where there is an adult offender with parenting responsibilities. This reflects the evidence that a significant family factor in youth offending is having criminal or anti-social parents and that children of offenders are also more likely to be excluded from school and twice as likely to suffer from behavioural and mental health problems.

The indicators below also offer the flexibility for criminal justice professionals to nominate parents and children where there is a potential crime problem, but no proven offence and they think this could be a sign of wider family problems. This may be particularly helpful when identifying families where there is strong intelligence about a family’s involvement in activities such as gang and youth violence or serious organised crime, but no proven offence.

<table>
<thead>
<tr>
<th>Indicators</th>
<th>Suggested Information Source</th>
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<tbody>
<tr>
<td>The family includes at least one of the following…</td>
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<tr>
<td>A child(^7) who has committed a proven offence(^8) in the previous 12 months.</td>
<td>Information provided by Youth Offending Teams and the police.</td>
</tr>
<tr>
<td>An adult or child who has received an anti-social behaviour intervention (or equivalent local measure) in the last 12 months.</td>
<td>Information provided by the police, anti-social behaviour teams and housing providers.</td>
</tr>
<tr>
<td>An adult prisoner who is less than 12 months from his/her release date and will have parenting responsibilities on release.</td>
<td>Information provided by probation providers(^9) and prisons.</td>
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</table>

\(^7\) under 18 year olds  
\(^8\) A proven offence is one where a formal outcome is given, either in or out of court.  
\(^9\) National Probation Service, Community Rehabilitation Companies and other providers of probation services.
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<th>Indicators</th>
<th>Suggested Information Source</th>
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<tr>
<td><strong>The family includes at least one of the following…</strong></td>
<td></td>
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<tr>
<td>An adult who is currently subject to a licence or supervision in the community, following release from prison, and has parenting responsibilities.</td>
<td>Information provided by probation providers\textsuperscript{10} and prisons.</td>
</tr>
<tr>
<td>An adult currently serving a community order or suspended sentence, who has parenting responsibilities.</td>
<td>Information provided by probation providers\textsuperscript{11}.</td>
</tr>
<tr>
<td>Adults and children nominated by professionals because their potential crime problem or offending behaviour is of equivalent concern to the indicators above.</td>
<td>Referrals from the police, multi-agency gang units, probation providers, Serious Organised Crime Partnerships, Integrated Offender Management Teams and CHANNEL coordinators\textsuperscript{12}.</td>
</tr>
</tbody>
</table>

**Children who have not been attending school regularly.**

Suitable full time education is not only an essential pre-requisite to better attainment, it is also strongly associated with a broad range of positive outcomes including reducing the risk of worklessness, youth crime and anti-social behaviour. In light of this, the new programme’s indicators generally mirror the education criteria used in the first programme. However, the expanded programme also offers a broader opportunity to identify children whose absence may be recorded as authorised but nevertheless is persistent and a cause for concern.

Since 2011, the Department for Education’s measure for ‘persistent’ absence was defined as missing more than 15% of possible sessions. In September 2015, this will reduce to missing 10% or more of possible sessions. Local authorities are encouraged to apply a 10% threshold from the start of the programme (i.e. April 2015) in order to maintain the programme’s alignment with schools and academies.

The suggested information sources below reflect learning from the first programme. While information collected locally for submission to the Department for Education should provide most of the information needed to identify families against these indicators, some supplementary information may be needed from Education Welfare Officers (or local equivalent) to produce a complete picture of each child’s circumstances and the reason for their absence. See Annex G for further information on data sharing arrangements.

\textsuperscript{10} As above.  
\textsuperscript{11} As above.  
### Indicators

The family includes at least one of the following…

<table>
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<tr>
<th>Indicator</th>
<th>Suggested Information Source</th>
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<tr>
<td>A child who is persistently absent(^1) from school for an average across the last 3 consecutive terms.</td>
<td>Information compiled locally for submission to the Department for Education for the School Census and Alternative Provision Census.</td>
</tr>
<tr>
<td>A child who has received at least 3 fixed term exclusions in the last 3 consecutive school terms; or a child at primary school who has had at least 5 school days of fixed term exclusion in the last 3 consecutive terms; or a child of any age who has had at least 10 days of fixed term exclusion in the last 3 consecutive terms.</td>
<td>Information provided by Education Welfare Officers.</td>
</tr>
<tr>
<td>A child who has been permanently excluded from school within the last 3 school terms.</td>
<td></td>
</tr>
<tr>
<td>A child who is in alternative educational provision for children with behavioural problems.</td>
<td></td>
</tr>
<tr>
<td>A child who is neither registered with a school, nor being educated in an alternative setting.</td>
<td>Information compiled locally from within the local authority</td>
</tr>
<tr>
<td>A child nominated by education professionals as having school attendance problems of equivalent concern to the indicators above because he/she is not receiving a suitable full time education(^2).</td>
<td>Referrals from teachers and education welfare officers (or local equivalent).</td>
</tr>
</tbody>
</table>

### Children who need help: children of all ages, who need help, are identified as in need or are subject to a Child Protection Plan.

The national eligibility criteria for the first Troubled Families Programme were purposely weighted towards families with school age children and based on assessments of poor school attendance and youth crime. The broader focus of the expanded programme allows local authorities and their partners, using the indicators below, to identify a wider group of families who may benefit from an integrated whole family approach. These are: children who have been identified or assessed as needing early help; children who have been identified as a ‘child in need’; and children subject to a Child Protection Plan or have been subject to Section 47 enquiries. This may include children experiencing or at risk of poor

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\(^1\) Currently measured as missing 15% of sessions, but reduces to 10% in September 2015. Threshold will continue to reflect the Department for Education metric.

\(^2\) Sections 7 and Section 19 of the Education Act 1996 provide a definition of a ‘suitable’ education. In summary, this means it is appropriate to the child’s age, ability and aptitude; and to any special educational needs, either by regular attendance at school or otherwise.
parenting, with developmental delay, at risk of exploitation (including sexual exploitation), those with challenging behaviours and those previously accommodated and returning home from care. In all such cases, the social worker may put forward a family who they believe would benefit from an integrated whole family approach.

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<th>Indicator</th>
<th>Suggested Information Source</th>
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<tr>
<td>The family includes at least one of the following…</td>
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</table>
| A child who has been identified as needing early help. This may include children below the threshold for services under Section 17, Children Act 1989. | • Information from local authority early years foundation stage providers (e.g. children’s centres) about children who don’t take up the Early Years Entitlement, by cross-referencing a list of those children eligible with those who are not in an early years setting.  
  * Information from local schools, academies and education welfare teams, Special Educational Needs Coordinators (SENCOs) or equivalent about children identified in the School Census as having social, emotional and mental health problems.  
  * Information from the police and Children’s Services (including youth services) about children who have been reported missing from home and identified as of concern. |
| A child who has been assessed as needing early help.                      | Information from Children’s Services or related multi-agency teams about children who are:  
  * repeatedly assessed under Section 17 or 47, of the Children Act 1989, but not deemed a child ‘in need’, or  
  * subject to Early Help Assessments (or local equivalent).  

A child ‘in need’ under Section 17, Information provided by Children’s Services.

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15 All three and four year olds are entitled to 15 hours of free Early Years Entitlement per week. All two-year-olds who live in households which meet the eligibility criteria for free school meals are entitled to a free early education place, along with children who are looked after by the state. The two-year-old entitlement was extended to 40% of the least advantaged two-year-olds as of September 2014.

16 As of September 2014, the School Census code for social, emotional and mental health problems is - SEMH.

17 For example, this may include local information following ‘safe and well’ checks carried out by the police or Independent Return Interviews.

18 This may include children, who when assessed were deemed below the threshold for services under Section 17, Children Act 1989.

19 For example, ‘Team Around the Child’, a ‘Team Around the Family’ or a ‘Team Around the School’.
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<tr>
<th>Indicator</th>
<th>Suggested Information Source</th>
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<tr>
<td>Children Act 1989.</td>
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<tr>
<td>A child who has been subject to an enquiry under Section 47, Children</td>
<td>Referrals from schools, social workers, early years providers (including Children’s Centres),</td>
</tr>
<tr>
<td>Act 1989.</td>
<td>health visitors, education psychologists, school Special Educational Needs Coordinators (SENCOs),</td>
</tr>
<tr>
<td>A child subject to a Child Protection Plan.</td>
<td>Youth Offending Teams and the police.</td>
</tr>
<tr>
<td>A child nominated by professionals as having problems of equivalent</td>
<td></td>
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<tr>
<td>concern to the indicators above.</td>
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**Adults out of work or at risk of financial exclusion or young people at risk of worklessness.**

The focus on employment in the first Troubled Families Programme was one of its most powerful elements. Feedback from areas suggests it had a transformative impact not only on family outcomes, but also on the approach and design of local family intervention services. The financial case for the prioritisation of employment outcomes for troubled families is compelling. Welfare benefits are the single greatest area of public expenditure on these families and the wider benefits of reducing welfare benefit dependency are felt across improvements in health, reductions in crime and local economic growth.

The new programme’s indicators mirror the first programme’s worklessness criterion, while taking account of the transition from the current welfare and tax benefits system to Universal Credit. However, they go further to reach young people at high risk of worklessness and those experiencing problematic debt, particularly those who have financial responsibilities in their household.

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20 Where there are concerns about children at risk of abuse or neglect, the existing referral route to local child protection teams should be followed in accordance with the statutory guidance - *Working together to Safeguard Children* https://www.gov.uk/government/publications/working-together-to-safeguard-children
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<tr>
<th>Indicators</th>
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<tbody>
<tr>
<td>The family includes at least one of the following…</td>
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<tr>
<td>An adult in receipt of out of work benefits.21</td>
<td>The majority of local authorities have access to the Department for Work and Pension’s Automated Data Matching Solution (ADMS) for the Troubled Families Programme. All areas will have access by June 2015. In the meantime, these areas will continue to have access to DWP’s manual data sharing arrangements.</td>
</tr>
<tr>
<td>or An adult who is claiming Universal Credit and subject to work related conditions22.</td>
<td></td>
</tr>
<tr>
<td>A child who is about to leave school, has no/ few qualifications and no planned education, training or employment.</td>
<td>Information drawn from Personal Learner Records23 and the local authority’s Client Caseload Information System (or equivalent)24 Information collected by local schools, academies and alternative providers for the Department for Education’s School Census and Alternative Provision and Youth Contract providers25 Key Stage 4 data compiled by schools and academies’ pupil level for the production of published school performance tables.</td>
</tr>
<tr>
<td>A young person26 who is not in education, training or employment.</td>
<td>Local authorities’ Client Caseload Information Systems (or equivalent)27, which indicates whether young people have been identified as not in education, training or employment (NEET) or whether their activities are ‘not known’.</td>
</tr>
<tr>
<td>Parents and families nominated by professionals as being at significant risk of financial exclusion. This may include those with problematic/ unmanageable</td>
<td>Referrals from organisations specialising in debt and finance, such as the Money Advice Service, Jobcentre Plus and housing providers.</td>
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21 As per the first programme, this includes adults in receipt of Employment and Support Allowance, Incapacity Benefit, Carer’s Allowance, Income Support, Job Seekers Allowance and Severe Disablement Allowance.
22 To be consistent with the Department for Work & Pension’s approach, this includes adults required (i) to attend ‘work focused interviews’; (ii) to meet ‘work preparation requirements’ (e.g. those with limited capability for work currently, but could make reasonable steps to prepare for work); and (iii) to proactively look for work (e.g. those expected to look and be available for work).
23 All 16-18 year olds should have a Personal Learner Record (PLR) and most local authorities already have access to this information as registered providers of education and training.
24 Local authorities are required to encourage young people to participate in education and training and identify those who are not engaged. For most areas, a key part of this is collecting good information about young people with few/ no qualifications and many record these details on a Client Caseload Information System (or equivalent) and others have arrangements in place to gather attainment data from providers.
26 See Annex C
27 See above comment.
Families affected by domestic violence and abuse.

Domestic violence and abuse has been a damaging and widespread problem for many of the families in the first programme. Its prioritisation in the expanded programme responds to clear and strong feedback from local areas and is reinforced by a compelling financial imperative; the consequences of domestic violence and abuse are felt across health, police, housing and Children’s Services budgets.

Defining the most useful indicators and capturing the most relevant information sources that capture domestic violence and abuse is not straightforward. Domestic violence and abuse often goes unreported and so agencies must be able to identify what is often considered ‘hidden harm’. The suggested information sources below give local authorities the flexibility to draw upon the intelligence of specialist agencies, rather than relying solely on reporting mechanisms. This means the identification of families whose problems include domestic violence and abuse is likely to lend itself to referral-based models, rather than the cross-referencing of larger data sets.

The Troubled Families Programme will apply the agreed cross-government definition of domestic violence and abuse, which defines it as: ‘any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional.

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Suggested Information Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>A young person or adult known to local services has experienced, is currently experiencing or is at risk of experiencing domestic violence or abuse.</td>
<td>Referrals from local domestic violence and abuse services or professionals, such as Independent Domestic Violence Advisors (IDVAs), housing providers, health services, the police, Children’s Services and Youth Offending Teams.</td>
</tr>
</tbody>
</table>

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28 Violence or abuse between those under the age of 16 should be captured as part of the youth crime or children who need help indicators.
29 This may include adult siblings, grandparents, uncles, aunts etc.
A young person or adult who is known to local services as having perpetrated an incident of domestic violence or abuse in the last 12 months\textsuperscript{31}.

*Local police data and intelligence. Referrals from local domestic violence and abuse services or professionals, such as Independent Domestic Violence Advisors (IDVAs), housing providers, health services, the police, Children’s Services and Youth Offending Teams.*

The household or a family member has…

- Been subject to a police call out for at least one domestic incident in the last 12 months\textsuperscript{32}.

*Information from the police, Multi-Agency Safeguarding Hubs (MASH) and Multi-Agency Risk Assessment Conferences (MARAC).*

**Parents and children with a range of health problems.**

Health problems for troubled families are costly and pervasive. In the first programme, the national evaluation showed that, on entry to the programme, families had disproportionately high levels of health problems compared to the general population: 71% of families included someone with at least one health problem; 46% included an adult with a mental health problem; a third of children were suffering from a mental health problem; nearly a third (32%) of families included an adult with a long-standing condition or disability; and one-in-five families included a child or children with a long-standing condition or disability.

The expanded programme will place an even greater emphasis on reaching families with a range of physical and mental health problems. The indicators and information sources below are the outcome of extensive discussions with local authorities, the Department of Health, Public Health England and NHS England: they reflect three main health priorities: mental illness, substance misuse and vulnerable new mothers. Improved data sharing will be integral to success in these areas as will a much deeper and wider programme of integration and service transformation to improve health outcomes for families.

In November 2014, a new national ‘health offer’ was launched to help health professionals and councils work more effectively together to improve troubled families’ health. This includes:

- A leadership statement setting out how local doctors, nurses and community health workers should work more closely with councils’ troubled families teams;

\textsuperscript{31} The time limitation is to ensure the data share is proportionate and in line with the requirements of the Data Protection Act. However, local authorities and their partners (particularly the police) can agree alternative local arrangements whereby information covering a longer period of time is shared where relevant. This is permissible and in line with the programme’s broader policy objectives.

\textsuperscript{32} As above.
- A new protocol to enable health information to be safely shared with troubled families' key workers; and
- Troubled families teams being able to access specialist health training.

The national ‘health offer’ is accessible at https://www.gov.uk/government/publications/troubled-families-supporting-health-needs and will be refreshed during the lifetime of the programme.

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Suggested Information Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>The family includes at least one of the following…</td>
<td></td>
</tr>
<tr>
<td>An adult with mental health problems who has parenting responsibilities or a child with mental health problems</td>
<td>Referrals from Community Mental Health Services, Child &amp; Adolescent Mental Health Services, local GPs, education psychologists and school Special Educational Needs Coordinators (SENCOs).</td>
</tr>
<tr>
<td>An adult with parenting responsibilities or a child with a drug or alcohol problem.</td>
<td>Information drawn from the National Drug Treatment Monitoring System. Referrals from local GPs, the police or local substance misuse support services.</td>
</tr>
<tr>
<td>A new mother who has a mental health or substance misuse problem and other health factors associated with poor parenting. This could include mothers who are receiving a Universal Partnership Plus service or participating in a Family Nurse Partnership.</td>
<td>Referrals from health visitors, midwives, family nurses or local GPs. Information from the Local Child Health Information System.</td>
</tr>
<tr>
<td>Adults with parenting responsibilities or children who are nominated by health professionals as having any mental and physical health problems of equivalent concern to the indicators above. This may include unhealthy behaviours, resulting in problems like obesity, malnutrition or diabetes.</td>
<td>Referrals from health professionals, including GPs, midwives, health visitors, family nurses, school nurses, drug and alcohol services and mental health services.</td>
</tr>
</tbody>
</table>

33 This includes children with conduct disorders.
34 The adult or child does not need to be in receiving specialist treatment.
36 Universal Partnership Plus is a service offered by a health visiting team and local services to support families with children under 5 years old who have complex issues that require more intensive support.
Annex C – Age Thresholds for Eligibility and Measuring Results

The new programme aims to improve outcomes for children and intervene earlier in families with problems; all eligible families must include dependent children. For the purposes of the programme, a dependent child is a person aged 0-15: aged 16-18 and in full-time education and/or training and/or unemployed and living with his/her family.

<table>
<thead>
<tr>
<th>Family Problem</th>
<th>Age Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>If a child is involved in crime or anti-social behaviour…</td>
<td>…the relevant family member should be between 10\textsuperscript{37} and 18 years old. If 18 or over, the family member is considered an adult for these purposes.</td>
</tr>
<tr>
<td>If a child or young person has not been attending school regularly…</td>
<td>…the relevant family member should be in suitable \textit{full-time} education, if the child is under 16 years old\textsuperscript{38}. This rises to 25 years old if the child or young person is under an education, health and care plan\textsuperscript{39}. This applies to children who currently have a statement of special educational needs.</td>
</tr>
<tr>
<td>If a young person is not in education, training or employment…</td>
<td>…the relevant family member should be 16-18 years old.</td>
</tr>
<tr>
<td>If a child has been identified/assessed as needing early help; or is a child in need under S.17, Children Act 1989; or is a child who has been subject to enquiry under S. 47, Children Act 1989…</td>
<td>…the relevant family member should be under 18 years old\textsuperscript{40}.</td>
</tr>
<tr>
<td>If an adult is in receipt of out of work benefits; or an adult is claiming Universal Credit and subject to work related conditions…</td>
<td>…if the relevant family member is 18 years or over. However, there are a small number of exceptions whereby 16 and 17 year olds can claim the following benefits under specific circumstances: Jobseekers Allowance, Employment and Support allowance and Carer’s Allowance.</td>
</tr>
</tbody>
</table>

\textsuperscript{37} [https://www.gov.uk/age-of-criminal-responsibility](https://www.gov.uk/age-of-criminal-responsibility)

\textsuperscript{38} or last Friday in June if you will turn 16 by the end of the school holidays.


<table>
<thead>
<tr>
<th>Family Problem</th>
<th>Age Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>If a person is experiencing or perpetrating domestic violence…</td>
<td>…the relevant family member should be 16 years old or over[^1]. If under 16 years old, violence or abuse should be captured as part of youth crime or children who need help indicators.</td>
</tr>
</tbody>
</table>

**Annex D – Success Measures for 400,000 Families**

While maintaining the first programme’s powerful focus on the measurement of multiple outcomes at an individual family level, the payment by results framework for the new programme operates differently. A results payment can be claimed by a local authority if it can demonstrate that an eligible family has either:

1. **Achieved significant and sustained progress, compared with all their problems at the point of engagement**, or

2. **An adult in the family has moved off benefits and into continuous employment.**

**Sustained and Significant Progress**

Descriptions and definitions of the outcomes and measures that constitute and demonstrate significant and sustained progress for all troubled families in each local authority should be agreed locally and set out in a Troubled Family Outcomes Plan. The purpose of these local Plans is three-fold:

1. **To lay out what your local authority and partner agencies aim to achieve with each family** in regard to the six problems the programme aims to tackle; and how this supports your wider service transformation objectives (i.e. how these ‘per family’ outcomes support broader area wide goals in terms of demand reduction for services or fiscal savings);

2. **To provide a basis against which your local authority can determine when significant and sustained progress has been achieved and, therefore, a results claim may be made for the family.**

3. **To provide a framework against which local authority Internal Auditors (and the Troubled Families Team’s ‘spot checks’) may establish whether a result is valid.**

The Troubled Family Outcomes Plan will provide an area-wide set of success measures applicable to all families, from which the outcomes and measures relevant to each family may then be drawn. For example, if a family has a debt problem, domestic violence problem and is unemployed at the point of engagement, then relevant outcomes would be drawn from the area’s Troubled Family Outcomes Plan and form the goals against which significant and sustained progress would be judged for this family.
There are eight key principles that all Troubled Family Outcomes Plans should reflect: These mirror some of the ‘top tips’ which are included in separate guidance on developing Troubled Family Outcome Plans.

**Principle 1:** Troubled Family Outcomes Plans should focus on the demonstration of outcomes, rather than inputs, processes and outputs. For example, the completion of a training course or the application of a particular intervention would be a process or input, whereas the outcome should focus on the measurable change achieved by the family as a result.

**Principle 2:** As some family problems may not be evident at the point of identification and only become apparent when trust has been established with the family (e.g. domestic violence and abuse) the relevant outcomes within the Troubled Family Outcomes Plan should be set at this later point, when a fuller picture of the family is known.

**Figure 1: Principle 2**

At the point of identification, based on information in local data sets, the Jones’ are known to have a child who regularly truants and both parents are claiming out of work benefits.

Following engagement, the family intervention worker begins work with the family and discovers the mum has a mental health problem and there’s a history of domestic violence between the parents.

To claim a result, significant and sustained progress for the Jones’ means outcomes have been achieved against all 4 problems.

2 out of 6 problems 4 out of 6 problems 4 out of 6 significant and sustained outcomes

**Principle 3:** Where some problems are not relevant to a family at the point of engagement (e.g. the adults are in work and therefore worklessness is not an issue), the local authority does not need to demonstrate significant and sustained progress against this problem to claim a result. However, the local authority should ensure that the family’s status has not regressed before a claim is made – i.e. should not have developed one of the six headline problems, where it was not a problem at engagement (e.g. has not become unemployed between engagement and claim)\(^{42}\).

\(^{42}\) There may be exceptions to this if the circumstances are considered particularly unusual. Such cases should be agreed with TFT on a case-by-case basis.
There may be a small number of exceptions to this principle. In some cases, outcomes achieved may appear to represent regression on face value, but could actually represent a significant positive improvement in the family’s circumstances.

An example might be where there has been an history of domestic violence and abuse in the family, the victim reports the violence and, as a result, the perpetrator is convicted of an offence for these crimes. On face value, the number of proven offences in the family may have increased, but the safety of the family has immeasurably improved.

Similarly the development of a health problem may be beyond the family or the service’s control in some cases. In such cases, the effective management and appropriate use of health services to receive treatment will be sufficient to satisfy this principle.

In these exceptional cases, a claim for significant and sustained progress may still be made, provided the claim is validated with local authority Internal Auditors and evidence could be provided to the Troubled Families Team as part of any subsequent ‘spot check’ process.

Principle 4: All school age children in every family for whom significant and sustained progress is claimed must be receiving a suitable education. This should include ensuring all school age children attend at least 90% (see page 16 above) of possible sessions on average across three consecutive school terms. This measure has been set to be equivalent to the Department for Education’s measure of persistent absence.

Principle 5: As far as possible, local authorities should develop and agree outcomes with local partners in the relevant public service areas. For example, health outcomes should be developed and agreed with local health partners and with reference to the Public Health and NHS Outcomes Frameworks and employment outcomes should be developed and agreed with local Jobcentre Plus District Managers, with reference to local skills, job market and growth objectives.

Principle 6: Where unemployment is a problem for a family at the point of engagement, an adult in the family does not have to secure continuous employment in order that a result for significant and sustained progress can be claimed. Instead, in these cases, as a minimum,

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43 Sections 7 and Section 19 of the Education Act 1996 provide a definition of a ‘suitable’ education. In summary, this means it is appropriate to the child’s age, ability and aptitude; and to any special educational needs, either by regular attendance at school or otherwise.
44 As per the current programme, this outcome is measured as an average across three consecutive terms rather than an average per term.
45 If a child ages between the point of engagement and when significant and sustained progress is claimed and is no longer of ‘school age’, this measure is no longer relevant to this child. However, we would still expect the local authority to demonstrate significant and sustained progress in the form of another locally determined education, training or progress to work outcome. This means a claim should not be made if the child is considered Not in Education, Employment Training (NEET) after leaving school.
a family should demonstrate significant and sustained progress towards work. For example, this might include outcomes such as achieving a recognised vocational qualification, undertaking significant relevant work experience over a sustained period of time or successful completion of an apprenticeship. This progress should be undertaken with a view to securing work ultimately and a ‘subsequent continuous employment’ outcome may be reported in these cases (see below).

**Principle 7:** The purpose of a Troubled Family Outcomes Plan is to provide a concise and clear account of the goals that each local authority strives to achieve with its troubled families and against which success claims may be measured and verified. It should reflect the area’s local service transformation ambitions in terms of reducing demand for, and dependency on, services in the long-term and in improving efficiency and outcomes for families. It should not be a complex, bureaucratic process.

**Principle 8:** Existing information sharing limitations should not be the starting point in setting outcomes. These limitations should not constrain local ambitions for families and services. Part of the programme’s service transformation objectives should be to ensure that information follows ambition - rather than the opposite.

**Principle 9:** The periods of sustainment for outcomes should be meaningful. These may vary between areas, reflecting local priorities and evidence. However, most areas have set a minimum of six months and the school attendance outcome should be demonstrated across at least three consecutive terms.

**Principle 10:** A Troubled Families Outcomes Plan should be a living document. Over the course of the programme, the Plans should be refined to reflect emerging service transformation priorities and respond to the evidence provided on local impact and family needs. While outcomes may change, levels of ambition should only increase.

This approach aims to provide the flexibility to measure success in a way which reflects the service transformation and costs reduction priorities of each local authority and its partners. Given the proposed five year duration of the programme, it provides the scope to update and refresh outcome measures to reflect changes in delivery and information sharing arrangements over time. Outcome measures may increase in their ambition as the programme progresses. While the Troubled Families Team will not mandate the outcomes, we will work with local areas to support this process and develop guidance and examples for other areas on the best approach.

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48 Unlike the current programme, there is no separate ‘progress to work’ measure. This should form part of the significant and sustained progress where unemployment is a problem for the family at the point of engagement.
Off Benefits and into Continuous Employment

Worklessness was a problem across many troubled families in the first programme and achieving continuous employment has often been a transformative outcome. Findings from Troubled Families Programme’s independent national evaluation found that an estimated 83% of families were receiving an out-of-work benefit on entry to the programme – compared with around 11% of the population nationally49.

During the first programme, in recognition of the scale of the challenge and importance of its success, the Department for Work and Pensions seconded 152 Jobcentre Plus advisors into the 94 upper-tier local authorities with the highest numbers of troubled families to support troubled families into work. Known as Troubled Families Employment Advisors, this additional resource and expertise was widely welcomed and local authorities reported its significant impact on employment outcomes.

From April 2015, this resource increases to 307 Troubled Families Employment Advisors. This means a further 55 local authorities will benefit. The distribution of these secondees was provided to local authorities in December 2014.

The movement of a family off benefits and into continuous employment often represents the culmination of significant and sustained progress across a range of outcomes for many families. For example, mental illness, substance misuse, offending behaviour, poor school attainment and experience of domestic violence and abuse are all well evidenced barriers to employment. To overcome these barriers, secure work and maintain it for at least 13 weeks represents a major outcome for most families.

As per the first programme, this result has two parts:

1. The movement off out of work benefits (or the satisfaction of an earning threshold if in receipt of Universal Credit, as appropriate), and

2. The sustainment of a period of continuous employment.

For families who move onto Universal Credit (UC), the data sharing arrangements with the Department for Work and Pensions (DWP) are under development. In the interim, arrangements should be agreed locally with your Troubled Families Employment Advisors to capture the right data. DWP are committed to working with the Troubled Families Team to find a solution.

For the first part for the result, where family members are in receipt of UC, the family must satisfy the relevant earnings threshold. Troubled Families Employment Advisors will provide information about earnings thresholds to local authorities.

If an adult reports moving into self-employment s/he will be referred by the Troubled Families Employment Advisor for a ‘Gateway Interview’ to be conducted by a Jobcentre Plus Work Coach. The outcome of that interview will be available to the local authority. Where an adult takes employment on a ‘zero hour contract’, in the interim this information will be available to the local authority via their Troubled Families Employment Advisor. A longer-term data sharing arrangement will be identified and communicated to local authorities as soon as possible.

For the second part of the result, the length of time an adult must remain in work depends on the type of benefit they were receiving previously. These measurement periods reflect the Department for Work and Pensions’ previous approach with its own providers.

<table>
<thead>
<tr>
<th>Benefit</th>
<th>Period of continuous employment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Job Seekers Allowance</td>
<td>26 weeks (out of the last 30 weeks)</td>
</tr>
<tr>
<td>Job Seekers Allowance (ex-Incapacity Benefit claimant)</td>
<td></td>
</tr>
<tr>
<td>Employment Support Allowance</td>
<td>13 consecutive weeks</td>
</tr>
<tr>
<td>Income Support</td>
<td></td>
</tr>
<tr>
<td>Incapacity Benefit</td>
<td></td>
</tr>
<tr>
<td>Carer’s Allowance</td>
<td></td>
</tr>
<tr>
<td>Severe Disablement Allowance</td>
<td></td>
</tr>
</tbody>
</table>

**Subsequent Continuous Employment**

Where a family member has already achieved significant and sustained progress towards work, but not yet secured a job, many local authorities have emphasised the importance of ensuring this is followed through and an adult in the family is moved into work.

While no additional central funding is available for these additional outcomes, many local authorities have asked to ensure that the total employment outcomes achieved with families is recorded systematically and forms part of their published results figures. This clear prioritisation of employment outcomes will serve as an incentive to ensure employment outcomes are maximised and the local fiscal and social benefits are realised.

In response to this feedback, local authorities will be able to report ‘subsequent continuous employment’ outcomes. This outcome is based on the following terms:
• It should only be reported for families where a sustained and significant progress result has already been claimed;
• It should not be reported for families where a continuous employment result has already been claimed;
• The adult in the family should have moved off out of work benefits and maintained a job for the same amount of time as the continuous employment result requires; and
• The outcome should be approved to the same standards as other results by the local authority’s Internal Auditors.

These outcomes will be published regularly on an individual local authority basis as part of the programme’s management information.
Annex E - The Evaluation

As part of the first Troubled Families Programme’s independent national evaluation, the Troubled Families Team asked all local authorities to provide four main forms of information:

- Family Monitoring Data: Local authorities provided detailed information about the characteristics and problems of at least a 10% sample of their troubled families across more than thirty public service areas, including health, crime, education, worklessness, housing, child protection and housing.

- National Impact Study: The National Impact Study made a quantitative assessment of the impact of the programme, by matching data about individuals in troubled families to national administrative datasets held by government departments (e.g. Police National Computer and DWP’s benefits systems).

- Cost Savings Calculator: In May 2014, the Troubled Families Team provided all local authorities with a new online Cost Savings Calculator. It is an evaluative tool which enables local authorities and their partners to calculate the savings achieved through the delivery of the first programme with real families by looking at their actual outcomes before and after intervention.

- Troubled Families Coordinator Survey: At the start of the first programme, all local authorities were asked to participate in a online survey in order to understand their delivery approach and objectives.

Working with the ‘early starter’ areas and other government departments, the Troubled Families Team has been designing the evaluation of the new programme. In particular, the Team sought to develop an approach to the collection of information which responds to the following requests from local areas:

- Clarity about the form and frequency of information requests at the start of the programme;
- Earlier and more regular feedback to local authorities and their partners on the findings of the evaluation;
- More locally tailored findings to inform and drive local operational improvements and service transformation; and
- Proportionate administrative burden on local authorities and their partners.

The following responds to and achieves these objectives and the increased Service Transformation Grant has been provided in part to fund the local analytical support needed to meet them.
The main elements of the national evaluation in which all local authorities will be asked to participate remain similar in their form to the first programme, but the amount of information requested and the way the information will be used changes considerably in response to the feedback provided by ‘early starter’ areas. Local authorities will be asked to provide the following information:

1. A small amount of personal information for every individual assessed for the programme in order to conduct a National Impact Study (NIS).
2. Family Progress Data (FPD) every six months for all individuals in families who are being supported by the programme against around a dozen measures for which there are no national administrative datasets.
3. Information relating to costs of delivering targeted integrated whole family services in each area for use in the Costs Savings Calculator (CSC)
4. All areas will be asked to undertake an online survey about their approach to delivery of the new Troubled Families Programme. The expectations for this element will be broadly similar to those in the first programme.

In addition, some local authorities will be invited to be involved in other parts of the national evaluation of the programme, for example by helping to facilitate a face to face survey of families in their area or by participating as a case study area. However, these activities will not form part of the sign up commitments made by all local authorities and will be agreed on a case by case basis with the local authority.

The National Impact Study

To minimise the amount of data local authorities are asked to collect on families and to provide the most robust assessment of impact possible, the expanded programme will maximise the use of the National Impact Study (NIS).

NIS was initiated under the first programme’s evaluation, and makes a quantitative assessment of the impact of the programme, by matching data about individuals in troubled families to national administrative datasets held by government departments (e.g. Police National Computer and DWP’s benefits systems). It provides an estimate of the added value of the programme by comparing families who have received an intervention with individuals in families before they started intervention and/ or who fell just short of eligibility for the programme. The impact evidence gained through NIS will also support a national cost benefit analysis of the expanded Troubled Families Programme. This will enable government departments to understand the value for money of their investment.

For the new programme, NIS will be different in a number of ways:
• Firstly, it will provide local findings. Findings will be provided throughout the delivery of the programme to show the impact of delivery in each upper-tier local authority. Options to provide information at a lower geographical level are also being explored.

• Secondly, it will provide impact information across more outcomes. In addition to information on crime, worklessness, benefits, education and child protection, NIS should also provide information on prison outcomes and health outcomes. A full list of the proposed variables on which impact information will be gathered has been provided alongside this Financial Framework and a finalised list will be provided during the summer 2015.

• Thirdly, impact information will be provided to local areas earlier in the programme and regularly throughout. A timetable for this work will be provided before April 2015. All local authorities should expect to submit data and receive findings from NIS on a twice yearly cycle.

• Finally, the findings from NIS will be used to significantly reduce the number of measures against which Family Progress Data (FPD) will be collected (reduced from 55 in Family Monitoring Data to around a dozen in FPD) and to pre-populate the majority of the benefits section of the Cost Savings Calculator for local authorities thereby reducing the administrative burden, improving the quality of the cost benefit analysis for local areas and facilitating greater comparability of savings achieved between areas.

The information required for NIS from local authorities comprises the following types of information about all families assessed for inclusion in the programme:

• Personal identifiers of individuals in all families assessed for eligibility (e.g. name, date of birth, gender and postcode)
• Eligibility problems met (as per this Financial Framework)
• Status of intervention (e.g. whether eligible, start/end date of intervention)
• Available unique identifiers (e.g. National Insurance Numbers, Unique Pupil Numbers)

A list of the information required has been provided alongside this Financial Framework and a template for its collection and submission will be provided before April 2015.

In response to feedback regarding the implementation of NIS, the Troubled Families Team will provide local authorities and their Information Governance Officers with the following advice and support:

• The Department's assessment of privacy risks associated with the study including,
Information regarding the data security arrangements put in place by DCLG and its partners,

- Examples of existing privacy notices used by local authorities and tested on a focus group of families, alongside existing guidance provided by the Information Commissioner’s Office (to be shared in March 2015), and
- Opportunities for you and your Information Governance Officers to ask questions and seek further information about the process before data is shared.

Given the importance of understanding the impact of delivery both nationally and locally, participation in NIS is a required sign up commitment to the new Troubled Families Programme. If areas do not fulfil this commitment then future Service Transformation Grant funding may be withheld.

**Family Progress Data**

As outlined above, participation in National Impact Study (NIS) will provide outcomes information across crime, education, child protection, employment and health for families on the new programme. However, there are a number of family problems that are not held in any national administrative datasets but which are important indicators of family progress. This includes issues like domestic violence and abuse and housing problems.

To ensure these important gaps are filled, local authorities will be asked to collect information about all individuals in families with whom they are working across this small list of measures on a twice yearly basis. This replaces the Family Monitoring Data (FPD) collected in the first programme and represents a significantly reduced number of measures, but with a greater emphasis on the change achieved by individual family members.

In response to local authority feedback, the FPD measures have also been aligned with the relevant unit costs in the Cost Savings Calculator. As above, the majority of the benefit measures in the Cost Savings Calculator will be pre-populated for local authorities using impact information from NIS. The remaining gaps will then be populated using information provided for FPD. Together, this significantly reduces the task of completing the Cost Savings Calculator.

For the findings in the Cost Savings Calculator to be credible and for the FPD data to be compatible with NIS, information should be collected and provided for all families supported by the programme, rather than the 10% sample that was collected for the first programme. However, these are all measures on which local authorities will be collecting information for the identification of families and measurement of significant and sustained progress any way so this should not represent an additional burden. Furthermore, funding has been provided through the increase Service Transformation Grant to support the local collection and submission of this information.
A list of the FPD measures has been provided alongside this Financial Framework and a template for its collection and submission will be provided by April 2015.

**Cost Savings Calculator**

In the context of the continued public spending reductions and the imperative that outcomes for families are improved for the long-term, understanding the fiscal benefits achieved through the local delivery of the Troubled Families Programme has never been more important. This enhanced level of fiscal accountability locally and nationally represents a significant cultural shift, but one which will inform local strategic priorities, investment decisions and operational developments.

The troubled families Cost Savings Calculator was released to local areas in May 2014 and all ‘early starter’ areas have committed to complete it in its entirety for the first Troubled Families Programme. The first wave of early starters have also committed to provide some information on families worked with in the new programme. This will form an important evidence base as part of the Government’s Spending Round considerations after the General Election.

For the new programme, the Cost Savings Calculator will be improved significantly to reflect learning from first programme and the different approaches taken with NIS and FPD. However, all information in the current system will migrate into the new system automatically.

As outlined above, the benefits section of the Cost Savings Calculator will be pre-populated for local authorities using information provided for NIS and FPD. No additional work will be required in this section. However, local authorities will retain the option to add local unit costs and measures. In these cases, data will need to be collected locally.

The only part of the Cost Savings Calculator which all local authorities will still need to complete will be the costs section, where the money invested in the delivery of the programme and (for comparison) pre-programme investments in targeted interventions for a comparable cohort should be entered.

**Transparency Based Accountability**

The financial benefits evident from each local authority’s completion of the Cost Savings Calculator, and the progress being achieved with families as evidenced through NIS and FPD will be included in regular publications by the Troubled Families Team, as part of the new programme’s drive to transform services through transparent local accountability.

For each local authority, this will lay out the form and extent of the problems of families in the programme, the progress achieved with these families and the fiscal benefits realised.
as a result. This rich information will enhance local accountability for the success of the programme and help shape discussions with partners about the service transformation objectives and overall effectiveness of delivery.
Annex F - Payment Terms

As per the first Troubled Families Programme, the majority of the funding is available on a per family basis for the achievement of significant and sustained progress or continuous employment outcomes. It will remain in two parts: an upfront attachment fee and a results-based payment.

All early starter areas committed to bring an agreed number of families into the new/expanded programme during 2014/15. An upfront attachment fee of £1,000 was paid to these areas for each of these families. Each local authority will be asked to report on their progress against this commitment at the end of March 2015.

All local authorities who are eligible to be part of the new programme in 2015/16 will be asked to commit to engage an agreed number of families. Those numbers will be agreed with each area before the start of that and subsequent financial years. For early starters, commitments made in 2015/16 will be additional to those made in 2014/15. Upfront attachment fees of £1,000 per family will be paid to all areas for each of these families. These payments will be made in the first quarter of the financial year. If any area does not fulfil its commitments in the previous year, DCLG may withhold future funding.

A results based payment of £800 will be offered for each family for whom the local authority claims to have either (a) achieved significant and sustained progress, or (b) moved off out of work benefits and into continuous employment.

The opportunity to claim results will normally be offered on a six monthly basis. As 2015/16 is a transitional year between the first programme and the new one, however, it will contain 3 ‘claims windows’; these will be in May and September 2015 and January 2016.

If a family has achieved significant and sustained progress and a claim for a results payment is made, the local authority may not claim a further result payment if an adult in the family subsequently moves off benefits and into continuous employment. This would constitute double payment for the same family. However, a field will be available on the results claim form to record that a ‘subsequent continuous employment’ outcome has been achieved. While no additional funding will be paid for this outcome, the results will be published to evidence each area’s overall success in terms of employment outcomes for families.

Local authorities may not receive further funding for a family for whom any payment has already been received as part of the first Troubled Families Programme. While it remains in

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50 Unlike the current programme, local authorities will not be asked to report against the number of families identified and being worked with every 3 months. Instead, areas will be asked to provide a single number – the number of families brought into the programme in January and then again by the end of March 2015. A schedule of reporting arrangements for 2015/16 will be set out for all local authorities ahead of national roll out in April 2015.
areas’ wider interests to ensure the improved outcomes of these families are sustained and they do not deteriorate, outcomes achieved with these families should not be counted twice. **The estimated 400,000 families supported by the expanded programme are in addition to the 120,000 families supported by the first programme.**

In the first programme, local authorities only received attachment fees and results payments for the equivalent of five-out-of-six of their families. This reflected analysis before the programme was introduced, indicating that Government had already made an investment in targeted interventions which aimed to achieve equivalent outcomes with approximately 20,000 (one-sixth) of families. No similar reduction will be made under the expanded programme: payments will be offered for 100% of families with whom the local authority agrees to work and with whom results have been achieved.

In addition to the funding for achieving outcomes with each of the estimated 400,000 families, each local authority will also be offered a Service Transformation Grant. This grant will be weighted in accordance with the total number of families that the Troubled Families Team and the local authority mutually agree will be part of the expanded programme in each area. It will follow a comparable band structure to the first programme. During 2014/15, the funding was offered as an additional pro-rata supplement to each early starter’s existing Troubled Families Coordinator grant at the following levels. From April 2015/16, the Troubled Families Coordinator grant will end and be replaced by the Service Transformation Grant in entirety.

In 2015/16, we expect the level of Service Transformation Grant offered to most areas to be around double that which each area currently receives as a Troubled Families Coordinator grant. This reflects the increased challenges of coordinating the programme at this scale, as well as the programme’s expectations in terms of wider service transformation and the increased provision of evidence via Family Progress Data, the National Impact Study and the completion of the costs savings calculator.

Due to specific changes in local demographic factors over recent years which have an impact on our calculations of the total number of families, a small number of areas will receive less than double the amount of Troubled Families Coordination grant. These areas will still receive an increase in funding, but to a lesser extent. This approach represents the fairest and most transparent way to allocate the funding across England, based on the best available national data. If further evidence becomes available later in the programme, the allocation of these funds may be reviewed.
Annex G - Data Sharing Guidance and Principles

The first Troubled Families Programme has driven significant changes in the ways that local authorities, government departments and local partner agencies systematically share information to identify and work with troubled families. The new programme offers an opportunity to build upon and extend upon this area of important public service transformation.

This annex highlights the different sources of information that are available to local authorities to help identify families who are eligible for support under the expanded Troubled Families Programme. It also includes potential gateways, including statutory and common law powers, for sharing information.

The information provided represents work in progress. Together with the ‘early starter’ local authorities the Troubled Families Team will seek to understand further, the specific barriers that might hinder data sharing under the expanded Troubled Families Programme and identify opportunities to address them.

As with the first programme, families will be identified on a ‘household’ basis. For these purposes, the definition used by the Census 2011 may be useful – i.e. ‘a group of people who either share living accommodation, or share one meal a day and who have the address as their only or main residence’. For the purposes of the programme, families must contain dependent children51.

In some areas, population churn and engagement across local authority boundaries may present issues. For example, some children may live in one local authority, but attend school in another; and some families may move between local authorities mid-intervention. The Troubled Families Team will not prescribe how local authorities should manage these issues, but encourage collaboration to agree pragmatic and legally compliant local data sharing solutions between local authorities.

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51 A dependent child is a person aged 0-15 in a household or aged 16-18 in full-time education and living in a family with his or her parent(s). Non-dependent children in families are those living with their parent(s), and either (a) aged 19 or over or (b), aged 16 to 18 who are not in full-time education or who have a spouse, partner or child living in the household. Such children are often young adults, but may be older.
Parents and children involved in crime or antisocial behaviour

In most cases, the main sources of information on parents or children involved in crime or anti-social behaviour are likely to be the police, anti-social behaviour teams, youth offending teams, housing providers, prisons and providers of probation services.52

A significant proportion of crime and anti-social behaviour data is likely to be drawn from the local police, using the Police National Computer and local youth offending teams. The police have a general common law power to share information to prevent, detect, and reduce crime.

There are also legal gateways that support data sharing in prescribed circumstances such as section 115 of the Crime and Disorder Act 1998, which allows the police, local authorities, health authorities, providers of probation services and other relevant agencies to share information about any person for a purpose linked to any provision under the Crime and Disorder Act, including where it is necessary for crime reduction. Section 115 of the Crime and Disorder Act was relied upon under the previous programme and is still applicable.

In addition, section 17 of the Crime and Disorder Act 1998 recognises that local authorities have responsibility for the provision of a wide and varied range of services to and within the community. In carrying out these functions, section 17 places a duty on them to do all they can to reasonably prevent crime and disorder in their area.

As part of the new programme, local authorities may also need to obtain data in relation to prisoners and adult offenders with parenting responsibilities, for which the main sources be the National Probation Service, Community Rehabilitation Companies and prisons. This information can, in some circumstances, be shared under section 14 of the Offender Management Act, which permits the sharing of data that would assist with the supervision or rehabilitation of offenders.

Given that the National Probation Service and Community Rehabilitation Companies are new organisations, the Troubled Families Team will work at a national level with the Ministry of Justice to promote the importance of sharing data with these bodies. However, local authorities should also seek to build relationships with local providers and encourage them to collect and share the data that will help them identify troubled families in a legally compliant manner.

Many local authorities have highlighted the need to strengthen data sharing arrangements between the Troubled Families Programme and local prisons. The importance of this for prisoners nearing release who are not in custody locally has been a particular issue. Linked to wider discussions about data sharing with the National Probation Service and

52 National Probation Service, Community Rehabilitation Companies and other providers of probation services.
new Community Rehabilitation Companies, the Troubled Families Team will work with the Ministry of Justice and HM Prison Service to progress these issues during the roll out of the new programme.

**Children who have not been attending school regularly**

Most of the relevant education data is already collected by local authorities on a termly basis using Unique Pupil Numbers, as part of standard data collection requirements for the Department for Education as part of the returns to the ‘School and Alternative Provision Census’. The Troubled Families Team recommends the use of this locally collected data to ensure the information is as current as possible.

There are a number of limited exceptions, where the information collected locally for the School Census may need to be supplemented by other sources:

- **Academies**: Academies collect this data through compatible systems and are legally able to share this with local authorities using Part 4 section 23 of the School Discipline (Pupil Exclusions and Reviews) (England) Regulations 2012. Around half of academies already share their data with local authorities.

- **Fixed exclusions**: This data is not always collected for children in alternative provision, independent schools or non-registered alternative provision providers. As such, local authorities should identify these children within their own local systems and through discussions with such schools. We expect these to be relatively small numbers. Some supplementary information may be needed from Education Welfare Officers (or equivalent) to produce a complete picture of each child’s circumstances. For example, this may relate to children who are in reception year classes and sixth form.

There are a small number of children who are considered 'missing' because they are not on the school roll. These children are likely to be among the most vulnerable category of children and therefore, it is important that the Troubled Families Programme identifies them as far as possible. However, it is not our intention to target children who are being appropriately home schooled, as these children will be receiving an education from their parents.

Local authorities may collect and share attendance under the school census regulations – Education (Information about Individual Pupils) (England) Regulation 2013, S.I. 2013/94 - which require maintained schools and pupil referral units to share information about pupil attendance.
Children who need help

Most of the information needed to apply the suggested indicators under this headline problem is already collected within local authorities, as part of their Children Services arrangements (or equivalent). However, it will typically require local authorities to combine information from across a range of sources.

For example, to identify children who have not taken up the early education entitlement, this may include cross-referencing information relating to two year old children who are eligible for the early education entitlement with information about those who are actually attending an early year setting. Under section 99 of the Children’s Act 2006, local authorities obtain information about individual children who are receiving early years provision; and under s13A of Childcare Act 2006 Her Majesty’s Revenue and Customs shares tax benefit credit and benefit information with local authorities for the purpose of determining whether or not a particular family may have a child who is eligible for funded early education.

Local authorities are also likely to draw a significant amount of the data relating to children who need help from their own local authority Children Services. Some of this information is already shared within the first programme and the relevant gateway is the implied powers to share information under section 17 of the Children Act 1989 in order to enable assessments to be undertaken as to whether services may be required by a child in need. More generally, implied data sharing powers under section 10 of the Children Act 2004 may also provide a means of obtaining information in order to safeguard and promote the wellbeing of children.

Adults out of work or at risk of financial exclusion or young people at risk of worklessness

For the first programme, the Department for Work and Pensions created a new legal gateway under the regulations of the Welfare Reform Act 2012. This allowed the Department for Work and Pensions to share data with local authorities – without informed consent – for the sole purpose of identifying troubled families.

The new regulations came into effect in May 2012 and they will continue to provide the gateway for identifying young people and adults in receipt of out of work benefits under the expanded programme. They will also provide the gateway for the sharing of this data once Universal Credit comes into effect, providing a gateway for adults claiming Universal Credit and subject to work related conditions.

Under the first programme, most local authorities have accessed this information via a manual data sharing arrangement with the Department for Work and Pensions. However, as part of a phased roll out, most local authorities are now moving onto a more flexible, frequent, accurate and cost effective automated system – known as the Automated Data
Matching Solution (ADMS) for the Troubled Families Programme. Guidance will be available on the ‘Supporting families’ Knowledge Hub.

Where family members are in receipt of Universal Credit (UC) Troubled Families Employment Advisors and Jobcentre Plus Single Points of Contact will help local authorities with any queries and provide information they need. This will include information about earnings threshold.

DWP are currently assessing how data sharing processes, for example the Labour Market System marker management information reports and ADMS, will work for families on Universal Credit.

To identify young people who are at risk of or are already not in education, training or employment, local authorities may draw on information held in their Client Caseload Information Systems (or equivalent). Local Authorities have a statutory duty to encourage and assist young people to participate in education or training. This stems from sections 68 and 70 of the Education and Skills Act 2008. As part of this duty local authorities collect information on 16 to 19 year olds and will be aware of those who are not in any form of education, employment or training, including those who are not able to work because of illness or other reasons such as caring for dependant or family members. Local Authorities may choose to share this information internally further to their general power of competence under section 1 of the Localism Act 2011. This information could be defined as individual pupil information under section 537A(9) of the Education Act 1996 so could also be shared by local authorities using section 537A(6) of that Act.

**Families affected by domestic violence and abuse**

In most cases, the main sources of information on families affected by domestic violence and abuse are likely to be the police or local domestic violence support services.

Like crime and anti-social behaviour, data obtained from the police can be shared using section 115 of the Crime and Disorder Act 1998.

Under section 54 of the Domestic Violence, Crime and Victims Act 2004 information can be disclosed by police to victim support groups (with consent). The data can also be shared between agencies via Information Sharing Agreements (ISAs). It is advised that ISAs between local services and local authorities should conform to IDVA Protocol, MARAC Protocol, MARAC/MAPP Protocol and SDAC Procedures.

Given the sensitive circumstances and nature of these cases, it is most likely that agencies will refer cases to a local authority on an individual basis (see referral section below).
Parents and children with a range of health problems

The sharing of health data for the identification of troubled families has been one of the biggest challenges of the first Troubled Families Programme. The new Troubled Families Programme aims to prioritise efforts to overcome these issues and ensure greater collaboration between local troubled families teams and health bodies. Given the particular sensitivities around the sharing of personal health data, the Troubled Families Team has been working with Public Health England, Department of Health and NHS England to agree an approach that allows families to be identified for support under the expanded programme on the basis of their health needs.

We have agreed a recommended minimum approach that local authorities and health partners may use to identify families on the basis of their health needs. The approach was published in November in draft data sharing guidance with advice from the health data sharing governance body (Information Governance Alliance) and national health agencies.

The approach recommends that a list of families that have already been identified as meeting one of the programme’s indicators is shared with relevant health partners so that they can use this to flag whether any of the suggested health indicators are met. You will then need to talk to your relevant health partners and/or governing bodies to work out the best ways of gathering and sharing this data.

While we recognise this is unlikely to unlock all the data you need to work with families, it will start the process of identifying the families in the health system that may be eligible for support. Some local authorities may already be receiving health data or have negotiated alternative data sharing arrangements with local health partners. The new data sharing guidance will not override this and should be used to help reinforce the health system’s support of the Troubled Families Programme.

Further information on the interim health data sharing protocol for the Troubled Families Programme is available here:


Data Protection Act 1998

As most of the data to be processed for the purpose of identifying families will be “personal data”53 within the definition of the Data Protection Act, and in many cases this data may be considered “sensitive personal data”54 within the definition of the Data Protection Act it will

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53 means data which relate to a living individual who can be identified – (a) from those data, or (b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

54 personal data consisting of information as to - (a) the racial or ethnic origin of the data subject, (b) his political opinions, (c ) his religious beliefs or other beliefs of a similar nature, (d) whether he is a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992), (e) his physical or mental health or condition, (f) his sexual life, (g) the commission or
be important for local authorities to ensure that the processing of personal data is carried out in accordance with the data protection principles set out in Schedule 1 to that Act.

The first of these principles requires that personal data must be processed fairly and lawfully and, in particular, that a condition of Schedule 2 is met. Where the data to be processed is sensitive personal data, a condition of Schedule 3 must also be met. One of the conditions an authority may rely on to process personal data under these Schedules is the individual’s consent (or in the case of sensitive personal data, explicit consent) to that processing. However, where it is not possible for an authority to seek consent in advance of processing personal data there are other conditions for processing which an authority may seek to rely on. For instance, when seeking to satisfy a Schedule 2 condition, authorities may look to paragraph 5(d) of the Schedule which allows for processing where it is necessary for the exercise of a function of a public nature exercised in the public interest by any person.

The conditions to allow for the processing of sensitive personal data under Schedule 3 are more limited and careful consideration will need to be given to the applicability of any particular condition. For instance, where it is not possible to seek explicit consent to processing, it may be possible for authorities to rely upon the condition set out in para 7(1)(b) of Schedule 3. This allows for processing where it is necessary for the exercise of any functions conferred on any person by or under an enactment and you will need to consider whether the information is needed in order that you can carry out a function which you have a duty or power to carry out under legislation.

It may also be possible for you to rely on Article 4 of the Data Protection (Processing of Sensitive Personal Data) Order 2000, which provides for processing which (a) is in the substantial public interest; (b) is necessary for the discharge of any function which is designed for the provision of confidential counselling, advice, support or any other service; and (c) is carried out without the explicit consent of the data subject because the processing is necessary in a case where consent cannot be given by the data subject; the data controller cannot reasonably be expected to obtain the explicit consent of the data subject; or it must be carried out without the explicit consent so as not to prejudice the provision of that counselling, advice, support or other service.

**Referrals**

The Financial Framework suggests a range of indicators that can be used to identify families under the six headline problems. However, within this Financial Framework, we recognise that referrals will be one important way through which local authorities can identify the families with the breadth of problems that the expanded programme is
targeting. This is why there are suggested indicators under each of the headline problems referring to ‘problems of equivalent concern’.

These indicators enable referrals from professionals locally and, depending on the nature of the risk and seriousness of the circumstances, may be undertaken with or without the individual’s consent. In some cases, consent must be obtained by law before a referral is made. However, in cases where consent is not prescribed by law, individuals should be made aware that their data is being shared and their consent should be sought wherever possible. However, this will be a matter for local assessment and professional judgment in the circumstances of each case.

Given the scale of the programme, referral arrangements are unlikely to be sufficient to identify the required volumes of families in each local authority. However, the expanded programme provides the flexibility to identify families through these means, where appropriate and as a supplement to other sources of identification.
Annex H - Principles for Internal Audit

The Role of Local Authority Internal Auditors

As laid out in this document, local authorities’ Internal Auditors should continue to verify results claims before they are made. However, the Department of Communities and Local Government has reflected on learning from the first programme and worked with local areas to consider how this function should operate in the context of the new programme’s different approach. In response, a group of local authority Internal Auditors have worked with the Department’s Troubled Families Team to lay out four guiding principles. These principles are intended to inform audit practices and ensure that the right balance between rigour and proportionality is struck in the wider interests of the programme’s delivery and value for money objectives.

The Principles

1. **Collaboration**: Internal Auditors and local authority Troubled Families Coordinators should jointly agree the evidential expectations required to claim a results within their Troubled Families Outcomes Plan. This should be a collaborative relationship, based on early and on-going joint work.

2. **Proportionality**: While the rigour of the process is important and appropriate practices should be in place to ensure claims are valid, the burden and costs associated with these practices should be proportionate to the size and financial value of the claim. For example, it may represent a disproportionate burden and expense for Internal Auditors to validate every result before a claim is made. As a minimum, the following should be undertaken:

   - a representative sample of 10% of results should be verified by the Internal Auditor before each claim is made, but larger sample sizes may be required for smaller claims in order to ensure the audit is meaningful;

   - the audit should verify the families’ eligibility for the expanded Troubled Families Programme, with supporting evidence and with reference to the Financial Framework; and

   - the audit should verify whether the progress measures have been achieved, with supporting evidence and with reference to the local area’s Troubled Families Outcomes Plan.

3. **Best Evidence Available**: While ‘hard’ data from local administrative systems may be available for many outcome measures, it may not be accessible in every case and this
should not limit the programme’s ambition to achieve outcomes in relation to such family problems. Furthermore, such administrative data may not always tell the full story where formal reporting levels are variable (e.g. domestic violence reporting to the police). In such cases, qualitative evidence provided by practitioners and families may be suitable alternatives. For all data, the Troubled Families Team should ensure appropriate quality assurance processes are in place and the Internal Auditor may review these arrangements as part of their verification process.

4. **Communication:** Troubled Families Coordinators and Internal Auditors should share as much information as far in advance as possible. This should include any relevant guidance documents provided to Troubled Families Coordinators by the Department for Communities & Local Government, any results claim timetables and any new Internal Audit expectations.