



HOUSE OF LORDS

Public Services Committee

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25 March 2024

David Johnston OBE MP
Parliamentary Under Secretary of State (Minister for Children, Families and Wellbeing)
Department for Education
20 Great Smith Street
London SW1P 3BT

Dear David,

I am writing to you in my capacity as Chair of the House of Lords Public Services Committee.

You will be aware of our Committee's longstanding interest in child vulnerability and children's social care. For most of our current membership, the very first work was to review the Government's Children's Social Care Strategy, *Stable homes, built on love*.¹ In May 2023, we reported our findings in *A response to the children's social care implementation strategy*.²

We thank you for your engagement with that report³, the constructive debate held in September 2023,⁴ and the publication of the final Strategy the subsequent day.⁵ In November 2023 we held an evidence session with witnesses from the National Society for the Prevention of Cruelty to Children, Action for Children and Barnardo's to review progress.⁶

This letter is to seek updates from you on points which arose during that session. I would be grateful to receive your reply within 15 working days.

¹ Department for Education, *Stable Homes, Built on Love: Implementation Strategy and Consultation - Children's Social Care Reform 2023*, (February 2023):

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147317/Children_s_social_care_stable_homes_consultation_February_2023.pdf [accessed 11 March 2024]

² Public Services Committee, *A response to the children's social care implementation strategy* (3rd Report, Session 2022-23, HL Paper 201)

³ Government response to Public Services Committee report, *A response to the children's social care implementation strategy* (July 2023):

<https://committees.parliament.uk/publications/41085/documents/200042/default/>

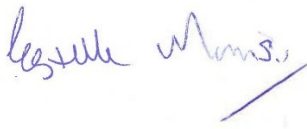
⁴ HL Deb, 20 September 2023, [cols 1503-1524](#) [Lords Chamber]

⁵ Department for Education, *Children's Social Care: Stable Homes, Built on Love – Government Consultation Response*, CP 933, September 2023:

https://assets.publishing.service.gov.uk/media/650966a322a783001343e844/Children_s_Social_Care_Stable_Homes_Built_on_Love_consultation_response.pdf [accessed 11 March 2024]

⁶ Oral evidence taken on 22 November 2023 (session 2022-23)
committees.parliament.uk/oralevidence/13887/pdf/

Yours sincerely,



Baroness Morris of Yardley
Chair, Public Services Committee

Urgency

We found that without greater urgency and speed the “golden opportunity” presented by the Government’s Strategy would be wasted.⁷ Our November evidence session has done nothing to reassure us about the pace of implementation. Witnesses were concerned about a “continued lack of signalling at the most senior levels politically that this is a priority”,⁸ and characterised progress as “piecemeal and gradual”,⁹ with “just small announcements gradually”.¹⁰

Much of your strategy is to be trialled in a small number of areas, ahead of further review. You state that, with your more complex reforms, you are taking a “test and learn” approach, testing many of your reforms through Pathfinder trials in some areas.¹¹ Our expert witnesses were, however, clear that many of the reforms in the Strategy have already been thoroughly tested. Cathy Ashley, Chief Executive of the Family Rights Group, told us: “We know what works ... you do not need a Pathfinder to determine that.”¹² It is telling that the Government response itself notes that the findings of a key Pathfinder will further build upon ten years of existing learning from the Supporting Families programme.¹³

Swift reform would not only be for social benefit, but for economic: research from a consortium of children’s charities has found that “delaying reform by just the two-year Pathfinder period will cost an additional £1 billion over the next ten years”.¹⁴

- **The Government response to our report states that the Government will “balance necessary reform in children’s social care, with the need to scale evidence-based intervention safely and effectively.”¹⁵ We believe that the Government have not yet found that right balance. When did you most recently review the timescales in the implementation Strategy?**

⁷ Public Services Committee, [A response to the children’s social care implementation strategy](#) (3rd Report, Session 2022-23, HL Paper 201), p4

⁸ Q I ([Abigail Gill](#))

⁹ Q I ([Abigail Gill](#))

¹⁰ Q I ([Abigail Gill](#))

¹¹ [Government response](#), para 41

¹² Oral evidence taken on 22 March 2023 (Session 2022-23), Q 9 ([Cathy Ashley](#))

¹³ [Government response](#), para 18

¹⁴ Q I ([Abigail Gill](#)) See also: NSPCC, ‘Government delay in reforming children’s social care in England will cost taxpayers £1 billion over 10 years’: <https://www.nspcc.org.uk/about-us/news-opinion/2023/government-delay-reform-childrens-social-care-england-cost-taxpayers-1-billion/> [accessed 11 March 2024]

¹⁵ [Government response](#), para 10

Since the Government's vehicles for reform – the Pathfinders – are being implemented in only a minority of areas, the majority of the country will remain for a significant time with “business as usual”.¹⁶ Our witnesses pointed us to a good summary of the pre-reform *status quo* published in November 2023. A joint inspection by Ofsted, the Care Quality Commission, and HM Inspectorate of Constabulary, Fire and Rescue Services reviewed the operation of early help in different local authorities. They found that: “the delivery, understanding and practice around early help were the most varied we had ever seen.”¹⁷ This would seem to lend credence to the view of our witnesses that many areas are “continuing to struggle ... continuing to fail children.”¹⁸

- **In the interim between now and full implementation of the Strategy, what steps are the Government taking to shore up the children's social care system in the majority of areas? How will the Government prevent an increase in area-based disparity?**

While praised for their efforts, the departmental teams working on implementation were described as “very small ... [they] are doing their best, but the resourcing is not there at the moment, despite the scale of the reform programme.”¹⁹

- **What plans do the Government have, if any, to increase resourcing for the teams tasked with delivery of this Strategy?**

Coordination between departments

Successful implementation of the Strategy will rely upon co-ordination and political buy in from multiple Government departments. Our report expressed concern that the Strategy did not adequately represent or account for the level of coordination that would be required, and that it contained numerous commitments to discuss or explore issues with other departments, rather than to implement outcomes that had already been agreed.²⁰ Our more recent witnesses suggested that these concerns remained. Concerningly, one told us: “I do not get the sense that other departments see this as their responsibility”.²¹

To address these issues, we had previously recommended that the Prime Minister's Delivery Unit should have a roll in securing political buy-in. Your department rejected this recommendation, saying that you would consider opportunities to work with the Prime Minister's Delivery Unit. However, in the views of our witnesses, co-ordination attempts are not working.

- **What steps will you now take to co-ordinate between Departments, and secure the buy-in on which successful implementation depends?**

¹⁶ Q 8 ([Abigail Gill](#))

¹⁷ Ofsted, ‘The multi-agency response to children and families who need help’: <https://www.gov.uk/government/publications/the-multi-agency-response-to-children-and-families-who-need-help/the-multi-agency-response-to-children-and-families-who-need-help#details> [accessed 11 March 2024]

¹⁸ Q 8 ([Abigail Gill](#))

¹⁹ Q 2 ([Jessica Ford](#))

²⁰ Public Services Committee, [A response to the children's social care implementation strategy](#) (3rd Report, Session 2022-23, HL Paper 201), para 13

²¹ Q 9 ([Abigail Gill](#))

Regional care cooperatives

During this inquiry we met a group of young people who had experience of social care. One of the more distressing stories related to us was by a young person who had been separated from their twin. Sadly, this is not an isolated incident: over 20,000 children in England are living as separated siblings.²² Others we met had been housed far away from their homes, their schools, and their support networks. This is a direct result of a shortage in social care placements, including residential homes.

The Strategy rightly acknowledges this as a significant problem and identifies a possible solution: regional care co-operatives (RCCs) which place forecasting responsibilities and procurement at a regional, rather than a local level. We still have serious concerns with this approach.

One concern is that moving from a local authority approach to a regional approach separates the decisions being made from the areas where the young people live, and may thus weaken liaison with other bodies and individuals involved in a child's care: their GP, their social worker, and their school. Our witnesses drew an analogy with regionalised adoption services, which they said had "siloes adoption somewhat".²³

- **What assessment has the Government conducted of the impact of regionalising adoption services? How has that assessment been considered in the design of regional care cooperatives?**

Another fundamental concern we have is that RCCs may not be any better equipped to deliver effective forecasting and procurement than local authorities. While we welcome the commitment for national support, these are specialised skills, and we were concerned to hear of an "expertise drain of those skills".²⁴

- **What steps are the Government taking to ensure that there is sufficient expertise within RCCs to meet the forecasting and procurement demands being placed upon them?**

We were pleased to note that the Government accepted our recommendation that the RCC Pathfinders should be properly evaluated "to assess the extent to which (including why and how) RCCs have contributed to the effectiveness of local planning and forecasting in helping to deliver better outcomes".²⁵ We acknowledge that the contract for this evaluation has been issued, but remain concerned about the long timeline for such evaluation.

- **How regularly will relevant departments be conducting interim evaluations on the RCC Pathfinders? How often will any such evaluation be published?**

²² Public Services Committee, [A response to the children's social care implementation strategy](#) (3rd Report, Session 2022-23, HL Paper 201), para 78

²³ Q5 ([Lynn Perry](#))

²⁴ Q 6 ([Jessica Ford](#))

²⁵ [Government response](#), para 34

The Strategy states that, following the consultation process, the Government has decided to refine its approach to the RCC Pathfinders.²⁶ We understand that this includes a set of minimum requirements for such Pathfinders, alongside the decision to develop them on a staged basis.

- **In what ways will the current approach to Regional Care Co-operative Pathfinders differ from the way they were originally envisaged?**

Information sharing

We have a longstanding interest in the benefits of information sharing as a tool to protect vulnerable children. We are content, following several meetings with the Information Commissioner, that his office is fully cognisant of the importance of such sharing. We note also the Department for Education's Policy Paper published in July 2023 on multi-agency information sharing which set out a number of interventions.²⁷ This paper outlined plans to investigate the possible use and role of the NHS number as a Consistent Child Identifier. The Children's Commissioner published an article in November 2023 which welcomed these plans but stated: "I believe the Department could be more ambitious and move quickly to support a wider range of services including education to introduce the use of NHS number in this way."

The Children's Commissioner also stated that the good examples of data sharing she had seen, while encouraging, were: "local, and so children remain at risk of falling out of view when they move between areas, without a fixed ID following them wherever they go."²⁸ The introduction of RCCs will cover many different local authorities, which may have separate processes for identifying children, potentially increasing this risk.

- **What mitigations has the Department for Education considered to ensure that children living in RCC Pathfinder areas can be consistently identified? What discussions have you held with the Information Commissioner's Office on these topics? What assessment has so far been made of the feasibility of using an NHS number as a Consistent Child Identifier?**

Transparency

The witnesses we held an evidence session with on 22 November 2023 represented three of the most significant children's organisations in the country, in some cases holding membership of boards or groups involved in implementation. However, they found it difficult to answer some of our questions on overall progress. They had received "vague responses" from

²⁶ Department for Education, *Children's Social Care: Stable Homes, Built on Love – Government Consultation Response*, CP 933, September 2023, p 9:

https://assets.publishing.service.gov.uk/media/650966a322a783001343e844/Children_s_Social_Care_Stable_Homes_Built_on_Love_consultation_response.pdf [accessed 11 March 2024]

²⁷ Department for Education, *Improving multi-agency information sharing* (6 July 2023):

https://assets.publishing.service.gov.uk/media/64d500285cac65000dc2dd91/Improving_multi-agency_information_sharing_2023.pdf [accessed 11 March 2024]

²⁸ Children's Commissioner, 'Connecting the dots – the importance of sharing data on children and families' (November 2023): <https://www.childrenscommissioner.gov.uk/blog/connecting-the-dots-the-importance-of-sharing-data-on-children-and-families/#:~:text=The%20Department%20for%20Education%20has,in%20health%20and%20social%20care> [accessed 11 March 2024]

departments to questions they had asked, and explained that they did “not have the full picture of progress”.²⁹ In their words: “If you are not on the working group, you do not know what is happening”.³⁰

We understand that the National Implementation board, the oversight mechanism for implementation of the Strategy, keeps a RAG (red, amber, green) rating system to monitor implementation of the strategy, but that this rating is unavailable to the public or the charities we spoke to.

- **Does the Department for Education have plans to publish the RAG rating collated by the National Implementation Board? If not, we would be grateful if you would share it with the Committee.**

There are a number of other points on which we would welcome clarification.

- Please can you provide some information on the intended role of independent reviewing officers and of Regulation 44 visitors?
- Our report highlighted the importance of independent advocacy for young people with experience of social care. In the Government’s response you stated that you are considering how it could work and that more detail would be shared “in due course”.³¹ When will such detail be available?
- What workload drivers have the National Workload Action Group identified as unnecessary for social workers? What progress has been made in delivering the Group’s recommendations since January 2023?
- The Early Career Framework is intended to provide additional support to social workers. We note that you were, at the time of your response, at the preliminary stages of designing this framework. Please can you provide a further update on this?
- The Government response to our report noted an intention to, when Parliamentary time allowed, provide legislative underpinning for RCCs which would provide for a clear accountability regime.³² What is your anticipated timeline for this?

²⁹ Q 1 ([Jessica Ford](#))

³⁰ Q 2 ([Jessica Ford](#))

³¹ [Government response](#), para 17

³² [Government response](#), para 46