

Barnardo's -Written evidence (CSC0003)

Submission to Request for written evidence - Public Services Committee inquiry into the Children's Social Care implementation strategy.

ABOUT BARNARDO'S

Barnardo's is the UK's largest national children's charity. In 2021/22, we reached 357,276 children, young people, parents and carers through our 794 services and partnerships across the UK. Our goal is to achieve better outcomes for more children. To achieve this, we work with partners to build stronger families, safer childhoods and positive futures.

ANSWERS TO THE QUESTIONS:

Considering the complex lives of children and families engaged in the children's social care system, what are the key issues policymakers should be considering as they review the implementation strategy?

Children's services in England have come under substantial pressure over the last decade with an increasing number of children and families needing help. The reasons for this are complex and are linked both to the COVID-19 pandemic and the lack of long-term investment in early intervention (and wider services), meaning families often find themselves reaching crisis point before being able to access help. For example, the number of children needing help from councils for mental health issues has increased by nearly 53 per cent since 2018¹. Similarly, there are also an increasing number of families being transferred into services due to the impact of domestic abuse on children – figures from NSPCC show that there were almost a quarter of a million referrals by police forces to social services for domestic abuse in 2020/2021 - an increase of 8% on the previous year². We are also seeing evidence of new and emerging threats to children particularly those relating to extra-familial harms. Analysis by the Association of Directors of Children's Service published in February 2021³ found referrals involving gangs and trafficking had increased by 69.9% and 45.4% respectively over the two years up to September 2020.

The combined impact of these trends means that pressure on children's social care is at an all-time high. Children in the care system increased by a quarter between 2010-11 and 2020-21⁴ while the number of children formally identified as 'in need' grew by 12,500 over the same period– this is despite a majority of social workers (70%) reporting that they feel that thresholds for qualifying as a 'child in need' have risen in recent years⁵. The number of children subject to a child protection plan also grew by almost 16% between 2013 and 2021 while the number of child protection investigations has increased by 48%⁶.

In addition to seeing increased demand for services we have also seen a significant reduction in spending on children's services. Analysis by Pro Bono Economics conducted on behalf of five major children's charities - including Barnardo's - calculated that while there has been a steady increase in spending on children and young people's services in recent years spending remains £249 million below 2010-11 levels in real terms⁷. The combination of limited funding,

¹ <https://www.local.gov.uk/about/news/social-workers-seeing-record-numbers-children-mental-health-problems>

² <https://www.nspcc.org.uk/about-us/news-opinion/2022/record-number-children-affected-domestic-abuse/>

³ [ADCS Safeguarding Pressures Phase7 FINAL.pdf](#)

⁴ [Children looked after in England including adoptions, Reporting year 2022 – Explore education statistics – GOV.UK \(explore-education-statistics.service.gov.uk\)](#)

⁵ <https://www.ncb.org.uk/sites/default/files/uploads/files/NCB%20Storing%20Up%20Trouble%20%5BAugust%20Update%5D.pdf>

⁶ https://media.actionforchildren.org.uk/documents/Too_Little_Too_Late_Report_Final.pdf

⁷ <https://www.probonoeconomics.com/stopping-the-spiral-children-and-young-peoples-services-spending>

combined with increased demand means that many local authorities have had to re-direct funding towards high-end, late intervention work. This has resulted in local authorities decreasing funding for early intervention support such as children's centres and youth services. Pro Bono Economics calculated that currently 80.5% of local authority spending is directed at late intervention services compared to 58% in 2010-11⁸.

A key issue for policy makers as they review the implementation strategy must therefore be the extent to which it will enable a re-balancing of the children's social care system, away from a high-end crisis service. The system must ensure that help is available for all families facing challenges, whether they are caring for babies or teenagers and whether that support relates to mental health, substance misuse, extra familiar harms or any of the other complex challenges modern families can face. This is why the Independent Review of Children's Social Care recommended that the Government invest £2bn over five years to reset the care system and re-focus spending on early intervention support. While the Government's Strategy for Children's Social Care⁹ does acknowledge the need for an increase in early support for families, and contains some proposals to help improve early help provision, Barnardo's feels that the current programme of reforms lacks ambition to achieve the radical reset which is required. The Strategy sets out a limited two-year programme of reform based on learning from 12 Pathfinder Programmes, with an expectation this will lead to legislation and investment in wider national roll-out at a later point, although no clear timetable or funding for this wider ambition is provided.

Therefore, while the investment of £200 million in 12 Family First Pathfinders is an important first step Barnardo's is calling for a more ambitious plan to achieve a re-set of the children's social care system. This should include rolling out a radical new approach to providing family help across the country, with a clear timetable for new legislation and a commitment to investing significant additional funding along the lines of the £2.6bn recommended by the Chair of the Independent Review of Children's Social Care.

How far do the priorities in the Government's strategy reflect the experiences and challenges children and families face? What areas or interventions would you have prioritised?

Overall we believe that the priorities as laid out in the Government's strategy, in particular those set out in the six pillars, are the right ones. Barnardo's is very supportive of a greater focus on early help for families, one that supports wider family networks to support children where possible. We also want to see change to ensure that when children do come into care they are provided with a safe loving place to live, close to their community, and given the support they need to recover from past trauma and thrive into the future.

However, while the overall message of the Strategy is correct, we are concerned that the detail of the Strategy overlooks some areas where reform will be needed if we are to achieve a better children's social care system. In particular Barnardo's was disappointed that the plan does little to consider the role of residential care settings. While foster care or kinship care is the right choice for most children who cannot live with their birth families, the system needs a range of different care placements and this will always need to include some high-quality residential care provision. Otherwise there is a risk of failing to meet the diverse needs of all of the children who are in the system.

⁸ <https://www.probonoeconomics.com/stopping-the-spiral-children-and-young-peoples-services-spending>

⁹ <https://www.gov.uk/government/consultations/childrens-social-care-stable-homes-built-on-love/guide-for-children-and-young-people-stable-homes-built-on-love>

There has been a sharp increase in the use of residential care homes for children in recent years - numbers rose by 27% across England between 2015 and 2020¹⁰. However, the extent of provision available is patchy and not distributed evenly across the country - a quarter of all children's homes, and 1 in 5 available places, are in the North West of England while only one in 19 homes, and one in 15 places, are in London¹¹. This means that children in residential care are more likely to be placed in out of area placements - over the past decade the proportion of out of area residential placements increased from 47% in the year ending March 2010 to 61% in the year ending March 2020¹².

Despite these issues the Government's Strategy does not fully recognise the role residential care can play in supporting children in the care system. While acknowledging residential care has a some role to play in meeting the needs of children who have "*specific and intensive therapeutic needs*" overall the Strategy's aim is primarily to ensure "*there are enough of the right kinds of foster homes*", with the overall aim to reduce the need for residential care, rather than seeking to grow and develop residential care options to meet the changing needs of children. The only significant proposal to increase sufficiency levels of both residential and foster placements is the proposal to introduce Regional Care Cooperatives - however Barnardo's has significant concerns that this proposal will not increase sufficiency in practice - we set out our more detailed concerns with this proposal later in this response.

We believe that issues around sufficiency in the children's home sector need to be given greater consideration in the Strategy for children's social care. We would like to see the development of a long-term strategy for residential care aimed at investing and growing suitable community-based provision. Such a strategy should include more upfront capital funding from central government to local authorities to develop provision. The strategy should also emphasise the benefits of local authorities developing long-term partnerships and promoting models which meet the needs of the changing nature of the population of children in care. For example, we believe there is an increased need to look at residential care models which allow for hybrid placements where children spend some time in residential care and some with birth family, kinship care, or perhaps foster care, this can often be beneficial for children with complex care needs. Equally there is a need for funding and commissioning models to incentivise providers to consider "step down" models where they work with a child with the aim of them moving to foster or kinship care at a later date - current models of funding provide little incentive for many providers to move children on.

Barnardo's are also concerned that while the strategy contains a welcome commitment to extend corporate parenting principles, which will be key to improving support for those who leave care, there is a lack of details in the Strategy of what tangible changes this will bring about. The average age for leaving the family home in England is 23¹³ yet care leavers are expected to leave care at the age of 18 or even younger. This group often struggle and have comparatively poor outcomes compared to their peers. They are less likely to gain good qualifications¹⁴, nearly half of children in care have a mental health disorder¹⁵ and it is estimated that 25% of homeless people have been in care at some point in their lives¹⁶. Barnardo's therefore believes that in addition to a general commitment to extend corporate

¹⁰ [CCN-Newton-The-Future-of-Childrens-Social-Care-Emerging-Findings.pdf \(countycouncilsnetwork.org.uk\)](https://www.countycouncilsnetwork.org.uk/CN-Newton-The-Future-of-Childrens-Social-Care-Emerging-Findings.pdf)

¹¹ [Main findings: children's social care in England 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/434242/Main_findings_childrens_social_care_in_England_2020.pdf)

¹² [CBP-7560.pdf \(parliament.uk\)](https://www.parliament.uk/business/committees/committees-a-z/commons-select/childrens-social-care/csb-7560/)

¹³ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/milestonesjourneyinginto adulthood/2019-02-18>

¹⁴ <https://explore-education-statistics.service.gov.uk/find-statistics/outcomes-for-children-in-need-including-children-looked-after-by-local-authorities-in-england>

¹⁵ <https://www.localis.org.uk/research/a-healthy-state-of-mind-improving-youngpeoples-mental-fitness/>

¹⁶ <https://www.nao.org.uk/wpcontent/uploads/2015/07/Care-leavers-transition-to-adulthood.pdf>

parenting principles to other bodies, the Government should also make firm commitments to improve support including:

- **Making care leavers eligible for the over 25 rate of Universal Credit.** Young people leaving care who are reliant on social security receive a lower Universal Credit payment by virtue of their age. If you are single and under 25, recipients of UC receive £265.31 per month compared to £334.91 for those over 25¹⁷. The reduced rate does not take into account the difficulties many young people face in managing financially, and that the price of everyday essentials is not lower because they are younger. This pressure is particularly apparent for young people who have grown in care, since they are far less likely to have access to financial support from their own family.
- **Providing free bus travel for all care leavers 18-25.** The average cost of a bus pass is £18 a week which is not affordable for many care leavers, especially in the context of rising costs. Access to free bus travel would enable care leavers to get more easily to work, college, visit relatives or access hobbies. It is estimated that the cost of setting up a national scheme for all care leavers aged 18-25 would be approximately £77m¹⁸.
- **A national programme allowing care leavers to access a 'rent deposit' as part of their benefits (to be paid back at the end of the tenancy).** Securing private sector tenancies can be difficult for care leavers - research shows that 13% of care leavers had been unable to access private rented accommodation because the landlord was unwilling to accommodate them¹⁹. To help with this the Government should introduce a statutory rent deposit scheme for care leavers that they could access as part of their benefit entitlement - this money would then be paid direct to the landlord. The DWP would be entitled to a reimbursement of this money at the end of the tenancy

Barnardo's is also concerned that the strategy does not do enough to recognise the mental health support needs of children in and leaving care. Data suggests that almost half of all Looked After Children have a diagnosable mental health disorder²⁰ - compared one in six in the general population²¹. Barnardo's own research demonstrated there was also a significant problem in relation to care leavers accessing mental health support. Our Neglected Minds²² report found that almost half (46%) of the care leavers whose cases were reviewed were considered by their personal adviser to have mental health needs. While the strategy contains a welcome commitment to use the early careers framework to help develop understanding of mental health issues amongst social workers we feel the Strategy should go further. We would like to see:

- **All children entering care should have a mental health assessment (just like they have a physical health assessment),** building on the work from the series of pilots of mental health assessments for children when they enter the care system the Government commissioned in 2017²³.
- **Every local authority should have a mental health lead for children in and leaving care.** These professionals would act in a similar way to the virtual school heads and playing a key role in co-ordinating action from different stakeholders, including CAMHS, mental health support teams in schools and community health services

¹⁷ <https://www.gov.uk/universal-credit/what-youll-get>

¹⁸ [Transport for Freedom - Barnardo's.pdf \(barnardos.org.uk\)](#)

¹⁹ <https://centrepoin.org.uk/media/2035/from-care-to-where-centrepoint-report.pdf>

²⁰ [A Healthy State of Mind: Improving young people's mental fitness - Localis](#)

²¹ [Mental Health of Children and Young People in England 2021 - wave 2 follow up to the 2017 survey - NDRS \(digital.nhs.uk\)](#)

²² [neglected-minds.pdf \(barnardos.org.uk\)](#)

²³ [Evaluation of the mental health assessment pilots for looked after children - GOV.UK \(www.gov.uk\)](#)

What are your views on the Government's measures to support children and families before decisions are made about children being taken into care? What further steps should be taken in this area?

Barnardo's believes that the proposed measures to support children and families before children are taken into care show promise, however we are concerned that overall they lack the ambition needed to achieve large scale change.

The promise of 12 Early Help Pathfinders has the potential to provide some valuable learning on how to support families. The proposed new Pathfinders should help develop models of multi-agency working which is essential in the delivery of effective family help, while the introduction of family help workers who will stay with the family throughout the process has the potential to ensure consistency of support and prevent families constantly having to "retell their story".

However, Barnardo's would like the Government Strategy to go further particularly by recognising the role that lower tier and universal services play in supporting families. For targeted family help to be for effective families who need help must be identified early, there must be swift referrals into the system, and there must be flexibility in the support offered which recognises that families' needs change over time.

Barnardo's believes family support works best when delivery is embedded within communities as part of a wide scale offer of support for all families. This includes universal 'help groups' for families, and specialist targeted support for those families facing more acute problem. Support should be provided for families from pre-birth up to when their children are 18 (or older in the case of those with special educational needs).

This model of integrated and comprehensive family support has become known as a Family Hub. It provides a '*local nerve centre*' within a community with a '*universal front door*' giving families somewhere they know they can go to whenever they need help or advice. As centres are non-stigmatising and open to all families can build trust with workers allowing them to be quickly referred to more intensive family support the moment a need is identified. Equally families who have accessed intensive family support can 'step down' to accessing universal services when their circumstances improve, with the option to be easily re-referred to more specialist help if circumstances change and a new need arises. Barnardo's has experience of delivering targeted early help services within this Family Hub model through a number of services including on the Isle of Wight which has achieved good results. Outcome data from the services shows that as a result of intensive support offered, the average outcome score for families we work with improved by 1.6 points on the five-point scale during the intervention²⁴.

We would like to see the Strategy include a commitment to a Family Hub available in every community. These hubs would have a role in offering targeted family help alongside a range of lower level and universal services and would become the established "go to" place for all families who need help, support or advice.

Similarly, while the strategy provides some promising measures aimed at supporting the wider family to take a greater role in caring for their children who cannot live with their birth families, measures to support kinship care in the Strategy should be developed further. There has been a growth in the use of kinship care arrangements over the last decade in particular with the increased use of Special Guardianship Orders – with the numbers of these orders growing from 1240 in 2009 to 3700 in 2020²⁵, yet there has been very little policy attention

²⁵ <https://corambaaf.org.uk/practice-areas/kinship-care/special-guardianship/statistics-special-guardianship>

paid to this group. The commitments to pilot family network support plans, invest £9 million on training and support for kinship carers and publish a national strategy for support for kinship care are all therefore welcome.

However, our experience is that kinship carers need much more in the way of practical support. The children in kinship care arrangements are equally likely to have suffered harm and abuse. Many kinship care arrangements start at short notice with little preparation as there is an immediate need to find a child a bed for the night. Taking on a child in a kinship care arrangement results in significant extra costs for carers, one study for example reported that 82% of carers had to buy a bed and almost 88% bedding, 92% had to buy clothing, almost 80% shoes and 83% toys²⁶. It can also be very difficult particularly at the start of placement for carers to maintain a job, while settling a traumatised child into a new home - most reports suggest that somewhere between 30% and 40% of carers leave employment completely when taking on a child in kinship care arrangement²⁷. However, the Strategy provides little detail on how the Government will assist kinship carers with these practical issues. ***It contains no firm commitment to provide a national policy on "Kinship Care Allowances", no commitment to introduce paid kinship care leave (similar to maternity and adoption leave) and it does not commit to providing legal aid to kinship carers.***

Tackling these practical barriers will be key if we are to ensure that these carers will be able to commit to caring for these children. Barnardo's hopes that many of these issues will be addressed in the forthcoming kinship care strategy however the Children's Social Care Strategy lacks ambition for providing practical support to these carers.

How far will the Government's strategy improve the experiences of staff who work directly with children and families? What further short-term interventions would be valuable?

The Strategy's focus on the children's social care workforce is welcome however we are concerned that it focuses only on the work of social workers. Measures including providing an early carers framework for social workers and alternative career paths to allow social workers to progress while remaining in front line service (rather than having to move into management roles) are therefore welcome, but overall the Strategy does not go far enough to address workforce concerns in other parts of the system.

We are concerned that there is no focus on the need to develop an attractive employment offer for those working in other lower paid roles within the system for example as children's residential care workers or personal advisers providing support to care leavers. Residential care is a challenging sector to recruit to - evidence from the Independent Children's Homes Association annual state of the sector²⁸ found that recruitment challenges were having a "severe impact" on the operating of almost two-thirds of providers, with more than 60% of providers reporting turnover of more than one in five members of staff. Yet finding the right individuals to take on these roles is key to providing high quality care to children particularly those with high levels of challenging behaviour. Similarly, while the Strategy contains welcome ambitions for improving support for young people when they first leave care, the workforce elements contain no mention of the role of personal advisers who will be key to delivering these. Again, these are usually low paid and often high-pressured roles, with workers expected to provide a wide range of support, from housing, to employment, to mental health and accessing benefits.

²⁶ [Overview-research-kinship-care.pdf](#)

²⁷ [Kinship Care - Hansard - UK Parliament](#)

²⁸ <https://www.revolution-consulting.org/wp-content/uploads/2022/06/ICHA-May-2022-final.pdf>

Barnardo's would therefore like the Government Strategy to commit to a more ambitious plan to develop the wider children's social care workforce with a particular focus on those that are comparatively low paid. The Strategy should consider how to ensure wages, career progression and other benefits can be provided that will attract people to the sector. A key part of this will be considering how to support staff to ensure that they remain safe at work (both physically and psychology) and considering how technology could be utilised to enable part-time and flexible working within the sector while still ensuring consistency of care (many providers including Barnardo's find that those attracted to the profession are those with their own caring responsibilities in addition to their professional role).

To support the development of children's workforce strategy we would also like to see ***the development of a workforce support service. Such a service could provide a centralised mobile peripatetic team who would be on hand to advise providers on how to address workforce challenges. Such a service would have a key role in helping bring together teams with a range of experiences including health, education, youth and children's services.***

What mechanisms are in place to effectively share best practice across local authorities and service providers, and how effective are they? What are the barriers to sharing and embedding good practice and how could they be removed?

Sharing best practice from the Pathfinder projects will be key to ensuing effective delivery of the Strategy. This will involve developing effective mechanisms for understanding how services are working on the ground and should aim to embed a test and learn approach, so that services are able to evolve organically, based on an understanding of what is and is not working in practice. To achieve this effective information sharing it will be important that:

- **Pathfinder areas are supported to collect and record data in a clear and systematic way** – there should be a focus on looking at both hard and soft outcomes for families to capture the full range of impacts.
- **Funding should ensure that Pathfinder areas are provided with effective technology to ensure data recording is simple.** Recording systems should not place too much burden on workers who need to "do their day job", which can act as a significant barrier to gathering good quality data which is an essential first step in sharing learning.
- **Mechanisms for sharing learning need to be built into the initial Pathfinder.** A significant risk is that learning is only considered as an outcome at the end of the two-year period, rather than an ongoing process. Barnardo's would welcome the introduction of regular six-month learning events between different Pathfinder areas to share learning and develop a shared understanding of what is working. Again, funding for such events needs to be established at the outset of the Pathfinder process.
- **Choice of initial area will be key to ensuring a good chance to capture learning on delivering family help in a range of different environments and contexts.** For there to be effective learning the Pathfinder areas should be chosen to test a range of different scenarios for delivering family help. Such considerations should include; a mix of rural and urban areas, a mix of areas with different population demographics, including age, ethnicity and levels of social deprivation and a mix of areas with a different track record in their delivery of family help services.

How might suggested changes to commissioning and planning processes and responsibilities, such as the introduction of Regional Care Cooperatives, affect

organisations delivering services? What changes would better enable service providers to deliver high quality services supporting children and families?

Significant reform is clearly needed in the way children's care placements are planned and commissioned. In March 2022, the Competition and Markets Authority (CMA) report on the children's social care market found that local authorities were often struggling to find places for some children, particularly those with complex needs²⁹. This was particularly true for residential care where the CMA found that local authorities were often struggling to find any suitable places for children who needed them. However, Barnardo's are concerned that the proposed introduction of Regional Care Cooperatives (RCCs) will do little to tackle the root causes of the problems the sector experiences with sufficiency and indeed that the introduction of RCCs may make a number of the current problems worse. We are concerned the proposal risks:

- **Fragmenting the care system.** Local authorities typically offer a range of services under the umbrella of children's social care, including early help, youth services and youth offending support. Vulnerable families seldom only access one part of the system. Splitting decisions around the commissioning of placements from other children's services will hamper joined-up planning and could result in a lack of consistency in the support offered to the child and family. Consistency of support is essential to enable re-unification after a time in care where appropriate and to prevent a child from frequently moving in and out of social care placements. Good placement decisions require good knowledge of the child which is best achieved by ensuring that all professionals who have worked with the family since they became known to the system are able to input into the care planning process. This will be harder to achieve if placements decisions sit regionally at arm's length from other elements of children's services which are locally based.
- **Smaller providers exiting the market** – the requirement to work with regional commissioners instead of local ones risks disadvantaging smaller fostering and residential providers who have strong relationships with their local authority and local community. Given it is expected that RCC's will seek to commission services over a wider geographical footprint many smaller providers will find themselves unable to compete in a market where they are expected to be able to offer services over a wider geographical footprint, means there is likely to be a significant move towards offering contracts to larger or providers without a local footprint or connection. Given the tensions between these priorities, it seems unlikely that both the business model of the small, local provider and the purchasing power of the RCC can thrive in the same system yet if smaller providers exit the market this risks exacerbating current challenges with sufficiency with fewer larger providers wielding significant market power.
- **An increase in out of area placements.** A regional approach to commissioning over too great an area may see an increase in children being placed a long way from their birth families even if placed in a "nearby" local authority, which can contribute to children feeling lonely and isolated. Also, even where children are placed at a close geographical distance to their home, it often still results in lack of access to services, such as mental health support, due to them not being seen as a priority group for support if they live outside their "home" local authority.

We are also concerned that the proposal doesn't learn the lessons from the introduction of Regional Adoption Agencies. RAAs were first introduced in 2015 and 29 have been set up across England. In a similar way to the proposals for Regional Care Cooperatives, they aim to bring together local authority adoption services into single regional groups. The aim was to improve access to placements and adoption support services through economies of scale.

²⁹ [Children's social care market study final report - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/106222/childrens-social-care-market-study-final-report.pdf)

However, it is difficult to conclude that adoption is working better in 2022 than it was in 2014. In England 2870 children were adopted in 2021, compared to 5050 in 2014 and children are also waiting longer to be adopted - it now takes on average 2 years and 2 months for a child to be adopted which has increased from 1 year and 11 months in 2018³⁰.

Our experience is that the programme has been significantly fraught with technical challenges. The reforms have separated adoption from other elements of children's services, and this has resulted in staff outside of adoption services having a limited understanding of it as a permanency option. The setting up of new bodies, with new legal structures has also taken time and resources that may otherwise have been spent on helping children. The process has also often marginalised voluntary adoption agencies despite them having expertise in recruiting adopters particularly for children with more complex needs – this has made it harder to find homes for many of these children.

Given that the introduction of Regional Adoption Agencies has failed to deliver on its objective of placing more children for adoption sooner we are concerned that the proposal to introduce regional care cooperatives will risk similar problems but on a bigger scale, given the wider range of services involved. Rather than introducing regional commissioning bodies ***Barnardo's would like to see a national sufficiency strategy supported with appropriate funding and greater oversight with support for commissioning at the local authority level provided by national Government.*** This would involve introducing a national oversight body which could support 'new approaches to commissioning'. The purpose of this body would be to support local authorities to improve commissioning practice and to aid them in improving systems for future planning for example through the utilisation of new technologies. However, the role of this national body would be to support local authorities in commissioning – the decisions on where to place children and how to support families should always be made at a local level and local authorities should maintain responsibility for ensuring there are sufficient placements in their area to meet the local need.

If the Government does decide to implement the proposal to introduce regional care cooperatives, then we believe as a minimum it must take the following action to address the concerns outlined above:

- **RCCs must have capital available to enable them to market shape and incentivise a mixed economy of providers.** This must be both through capital investment and supporting the creation of strategic partnerships which offer balanced risk sharing contracts, attracting value-based innovation and enabling not-for-profits organisations to compete with the high profit private providers.
- **There should be a programme of testing of the RCC concept through pilots and a thorough examination of local authorities who are already exploring collaborative regional approaches.** For example, West Sussex, Kent, Portsmouth and Southampton are currently exploring a regional approach to commissioning.
- **Local commissioners must have the right skills to more accurately forecast demand in the care system, so that they are able to market shape and create sufficient localised placement options for children in care.** Would providing commissioners and procurement professionals with better access to training and technological solutions, data management, analytics and predictive modelling platforms improve forecasting without a major structural change to RCCs? Better use of modelling technology to predict demand for placements is already in development for example in Barking and Dagenham – has the Department explored how effective this is compared with a regional model of commissioning?

³⁰ [Children looked after in England including adoptions, Reporting Year 2021 – Explore education statistics – GOV.UK \(explore-education-statistics.service.gov.uk\)](https://www.gov.uk/explore-education-statistics/service/gov-uk)

- **The introduction of a system of Government oversight for the new system.** For example the Department for Education should collect and publish data on 1) the number of children in out of local authority area placements 2) in placements at a distance, by a) types of placements b) stability of placements, c) age of the child and d) rates of children going missing from those placements.
- **A requirement for Ofsted to inspect regional commissioning of placements** to ensure that regional commissioning results in placements available where children need them and not in the areas with cheaper housing etc
- **The possible introduction of a statutory requirement that a child should wherever possible be placed close to their home and maintain the right to access support services from their “home” local authority.** This should help mitigate against an increase in out of area placements and encourage RCCs to consider not only placement but the other support needs of the child, even if access to these support services is not within their remit – thus helping to prevent children’s social care becoming very fragmented.

When developing the strategy, how effectively has the Government considered the voices of a) children and families, and b) voluntary sector organisations working in children’s social care?

The Government has provided a number of opportunities to ensure that children and young people and the voluntary sector have been able to contribute their thoughts and views on the strategy to date. We are particularly pleased that the Department has developed a stream of work specifically considering how views of the reform programme can be sought from children and families who are not currently accessing services and who are often missed from consultation exercises. As the voluntary sector we feel that there have been opportunities to contribute however we were disappointed as a sector to see that our urgent calls for more funding to help stabilise children service have been ignored. The sector has been clear that plans for reform must be backed by a commitment for ambitious long-term investment as well as the Government recognising and responding to the pressure on children’s services and local authority budgets right now³¹, however Government failed to commit to taking any action to addressing this within the spring budget.

We believe that the key to effective engagement will be to consider how children and families can remain involved in the process throughout the reform programme. Currently the strategy provides a two-year plan on action which will take place in the short term, but much of the detail including changes to legislation are likely to take place over a longer time period. Ensuring children and young people’s voice remain at the heart of this Strategy longer term will therefore be important particularly as the Government moves towards consulting on some of the further details on the long-term reform plan such as the extension of corporate parenting principles and the possible development of an enhanced opt-out advocacy offer.

28 March 2023

³¹ [Our joint statement in response to the Government’s announcement on children’s social care | by The Children’s Society | Feb, 2023 | Medium](#)