

BECOME.

THE CHARITY FOR CHILDREN IN CARE
AND YOUNG CARE LEAVERS

Response to the Department for Education consultation on its Stable Homes, Built on Love Implementation Strategy

May 2023

[Become](#) is the national charity for children in care and young care leavers. Our vision is that care-experienced people have the same chances as everyone else to live happy, fulfilled lives. Our mission is to help children in care and young care leavers to believe in themselves and to heal, grow and unleash their potential. We work alongside them to make the care system the best it can be.

Introduction

Our response is informed by the voice, views, insights and experiences of the care-experienced children and young people we work with. During the consultation period, between February and May 2023, to inform our response, we have:

- Carried out two workshops with care-experienced children and young people to hear their views on the Government's wider [Stable Homes, Built on Love](#) strategy;
- Distributed a short survey with young people in our network; and
- Carried out four workshops with a group of young people as part of a project specifically focused on the proposals to extend corporate parenting duties to other public bodies.

Our response is also informed by the insights of the care-experienced young people that we work with from:

- Four workshops that we held with care-experienced young people over the summer and autumn 2022 to hear their views on the recommendations of the Care Review;
- Our [Sky's the Limit](#) project;
- The [APPG Spotlight Inquiry](#) by the APPG for Looked After Children and Care Leavers, which we provide the secretariat for;
- Our recent [Gone Too Far campaign](#); and
- Numerous sessions that we ran to ensure that the views, experiences and insights of care-experienced young people were able to inform the Independent Review of Children's Social Care.

A number of quotes are provided throughout our response. These quotes are anonymised, but all quotes are from care-experienced children and young people, aged between 13-27 years of age.

Our focus is on improving the experiences, opportunities and outcomes for children in care and young care leavers. Consequently, we have only answered the questions in this consultation that relate directly to the lives and experiences of children in care and care leavers.

Our response

- 1. We want to hear from children and young people with lived experience of care, as well as others. Are you responding as: a child or young person under 18, an adult or an organisation?**

An organisation

- 2. To help us analyse responses, please tell us more about you. In what capacity are you responding?**

As a charity

- 3. If you are responding on behalf of an organisation, what is your role within that organisation?**

Manager

- 4. Would you like us to keep your response confidential?**

No

- 5. In sharing findings from this consultation, may we quote from your response publicly?**

Yes, attributable to my organisation

- 6. This question is only for adults over the age of 18, or organisations. May we contact you if we have any follow-up questions?**

Yes – matt.blow@becomecharity.org.uk.

- 7. Overall, to what extent do you agree these six pillars are the right ones on which to base our reforms for children's social care? [Select one from: Strongly agree; Agree; Neither agree or disagree; Disagree; Strongly disagree; Don't know]. If desired, please explain your response.**

Neither agree or disagree

We welcome some of the elements and ambitions included within the six pillars, such as the ambition for more families to receive early help, and the ambition to strengthen kinship care, so that more children can remain living with and thrive with their family or wider family network. We were also pleased to see the Government's commitment to put love and stability at the heart of the care system. However, overall, the proposed implementation plan does not include the urgent action or investment needed to make this vision a reality.

We were disappointed that the strategy did not include more concrete reform proposals and accountability measures to address the instability that children in the care system face on a daily basis, or to end the care cliff that is faced by so many young people leaving care.

We are also concerned about the lack of investment. The £200 million investment that has been allocated to implement the strategy over the next two years is a fraction of what is needed to meet the scale of the challenge: and it is well below the amount that Josh MacAlister, or others, such as the Local Government Association, have predicted is required to reform the system. It is estimated that the adverse outcomes that care-experienced young people face cost the treasury £23 billion each year, so it makes financial sense to invest earlier.

8. What more can be done by government, local authorities and service providers to make sure that disabled children and young people can access the right types of help and support?

We think there are some clear reforms and principles that can be embedded by Government, local authorities and providers to improve the provision of support for disabled children:

- Ensuring that disabled children are not moved far from their support network unless this is in their best interests and all of their needs are able to be met.
- Ensuring that disabled children aged 16 or 17 are not moved into supported accommodation, where all of their needs are not able to be met in this setting.
- When disabled children move homes, ensure there is consistency and continuity of any health, care or education support they may receive; and ensure there is no disruption to this support.
- Foster care recruitment campaigns should be targeted to increase the number of foster carers who are able to support a wide range of needs and impairments.

Other suggestions that we have included from care-experienced young people have included:

- Improving accessibility by providing more accessible homes and resources.
- Ensuring that disabled young people are at the heart of decision-making about decisions that affect their lives, such as the type of support they need and where they live.
- Provide more personalised support: including communication that is tailored to the needs and preferences of the young person, individualised plans to support wellbeing, frequent health check-ups and in-person medication reviews, and more funding for earlier assessments of ADHD and autism – avoiding lengthy delays.
- Providing more continuity of EHCP support when moving, and reduce the risk that moving home leads to a change in support.
- Increasing the number of well-trained staff to support disabled children in various settings.
- More early intervention.

9. To what extent are you supportive of the proposal for a system that brings together targeted early help and child in need into a single Family Help Service in local areas? [Select one from: Fully supportive; Somewhat supportive; Neutral; Somewhat oppose; Strongly oppose; Don't know] If desired, please explain your answer.

N/A

10. Looking at the features of early help listed below, in your opinion or experience, what are the top 3 features that make it a supportive service for families? [Select 3 only]

- The service is designed together with the input of children and families
- Having people with the right knowledge and skills available to help when needed

- Being able to access the right type of support

11. Have you ever provided or received parental representation during child protection processes?

No, my organisation do not provide or facilitate any form of parental representation

12. If you have had experience with a form of parental representation in the child protection process, please tell us about it.

N/A

13. If you are happy to or would prefer to talk to us about this, please indicate your consent to be contacted in relation to this set of questions only (questions 11, 12 and 13):

No

14. In your view, how can we make a success of embedding a “family first” culture?

There are a few key principles that should be embedded to ensure the success of a ‘family first’ culture:

- Firstly, it is essential to ensure that the views, wishes and preferences of children and young people are paramount in decisions about where they live, and who they should live with. The views of children should be sought at an early stage and throughout the process, they should be listened to and acted upon. Children should feel involved in and listened to throughout the process.
- Secondly, it is important to recognise the importance of sibling relationships and to ensure that siblings remain living together wherever possible. [Recent research](#) shows that 37% of all children are separated from their siblings in their initial placement in care, and 78% of children placed in children’s homes.

15. In your view, what would be the most helpful forms of support that could be provided to a family network, in order to enable them to step in to provide care for a child?

N/A

16. What support does your local authority provide to Special Guardians or to a nonparental party with a Child Arrangements Order?

N/A

17. To what extent are you supportive of the working definition of kinship care? [Select one from: Fully supportive; Somewhat supportive; Neither supportive or opposed; somewhat opposed; strongly oppose; Don’t know] If desired, please explain your response.

Somewhat supportive

We welcome the working definition of Kinship Care, but agree with the Kinship Care Alliance – of which we are members – that the definition must also be written into primary legislation for it to provide the necessary clarity and to have sufficient weight.

It is important that the views of children and young people with lived experience of kinship care are actively sought in relation to the working definition. If there are not a significant number of respondents from children and young people with lived experience of kinship care through the consultation, the Department should develop other methods to proactively seek their views on this definition.

We agree with the Kinship Care Alliance that the Government should also take the opportunity when developing a definition to address notable gaps where the present legal framework falls short:

- A private fostering arrangement comes about only after the child has been with the kinship carer for 28 days. Prior to this, the arrangement appears to have no status of any kind. It is simply not perceived in the current legal framework.
- Former step-parents without parental responsibility who take on the care of the child are deemed to be privately fostering after 28 days. Prior to that however it is not clear what the status of the arrangement is.

18. Overall, to what extent do you agree that the 6 key missions are the right ones to address the challenges in the system? [Select one from: Strongly agree; somewhat agree; Neutral (Neither agree nor disagree); Disagree; Strongly disagree; Don't know] If desired, please explain your response.

Somewhat agree

We welcome the introduction of the six key missions, and the general direction of travel. Care-experienced young people have repeatedly raised with us the issues of relationships, education, employment, housing and mental health as key areas for reform. This was reflected in the findings of the APPG on Looked After Children and Care Leavers' [Spotlight Inquiry](#), which we provided the secretariat for.

The missions could have been more ambitious and included more measurable targets. For example, Mission 4 states that “by 2027, we will see an improvement in the education, employment and training outcomes of children in care and care leavers”. However, this is lacking any specific or measurable commitment about how educational, employment or training outcomes will be improved or how many care-experienced children and young people will benefit from the proposals aligned to this mission.

The scope of some of the missions is too narrow. Again, as an example, Mission 4 makes no reference to secondary education, despite the educational disparities that many children in care face at secondary school. It was disappointing that the mission to improve educational outcomes for care-experienced children and young people did not have a greater focus on the barriers and challenges that children in care can face before the age of 16.

There are several really positive proposals in the Missions that could significantly improve the experiences, opportunities and outcomes for care-experienced young people, but will not be

implemented for a number of years and will only be legislated for when Parliamentary time allows. These reforms include the extension of the Staying Put and Staying Close scheme, the commitment to introduce opt-out independent advocacy, and the extension of corporate parenting duties. It is imperative that all reforms are delivered at pace, and that primary legislation is introduced as soon as possible, so that children and young people in and leaving the care system now can benefit from these reforms.

One important area that is missing was a mission or commitment to provide more financial support or security for young people once they have left care. Care leavers face disproportionate financial pressures and responsibilities compared to their peers, without the same financial support or safety net if they experience a financial crisis. We have heard from care leavers who have started their adult lives in poverty, or in debt, once they have left the care system; without the appropriate support. These pressures are likely to be exacerbated for many care leavers in the current economic climate, due to the rising living costs. More needs to be done to provide financial advice, support and security for young people prior to and after they leave care.

19. To what extent do you agree or disagree that a care-experienced person would want to be able to form a lifelong legal bond with another person? [Select one from: Strongly agree; Agree, Neither agree nor disagree; Disagree; Strongly disagree; Don't know]

Agree

The majority of the care-experienced young people that we have asked about this have been strongly supportive. Several young people felt that this would be really beneficial, and that a lifelong legal bond would be more likely to lead to a lifelong commitment and a loving relationship. Many emphasised the security and support that they felt such a bond may provide:

- “I think this is a really good idea and it allows the care leaver to have support even past the care cliff age. This will enable better outcomes as they have a foundation and support system to turn to”
- “I think it is really important as some care leavers are really isolated and need someone they know and trust.”
- “Extremely important, having those links ensure that a young person has someone that they can go to advice or support, and they can support with life situations, such as bills and rent.”

However, a few care-experienced young people emphasised reservations about this reform, either thinking that this wouldn't be relevant to them, or that it may create some additional risks:

- “What if the relationship breaks down?”
- “I think that it is going to promote unsafe and abusive relationships if it's not done very carefully”

20. What would you see as the advantages or disadvantages of giving legal recognition to a lifelong bond?

The advantages of giving legal recognition to a lifelong bond could include:

- Providing stability and security for care-experienced young people;
- Providing emotional and practical support, and commitment as part of a lifetime loving relationship;
- Legal rights, such as inheritance and property rights, and decision-making authority in circumstances where people are lacking capacity;
- Social recognition of the solidity and importance of a relationship;
- Benefits in terms of wellbeing, identity and a sense of belonging, togetherness or solidarity;
- Benefits linked to insurance, healthcare policies, pensions that allow delegated benefits for family members or next of kin.

The disadvantages of giving legal recognition to a lifelong bond could include:

- A complex legal process that may require lots of time and financial resource.
- The risk that people may not fully understand the implications of the legal process – such as how to dissolve the legal recognition if the relationship breaks down, or whether people would automatically incur delegated decision-making responsibilities that they may not be aware of;
- Young people we have spoken to also flagged the risk of emotional or financial abuse.

21. What support is needed to set up and make a success of Regional Care Cooperatives?

We are concerned that the regionalisation of commissioning:

- risks moving decision-making away from young people and the professionals that know them best;
- will be a costly reorganisation that won't boost supply, and could instead force smaller providers, who may be unable to respond to regional commissioning, out of the market; and
- may lead to even more young people being moved miles from their local area, to another part of the region, and far away from their friends, family, schools and support networks.

Ultimately, we are not supportive of Regional Care Co-operatives, but if they are to go ahead we think that the following elements need to be included to increase their chances of success. These elements should be included in the two regional pathfinders that will be used to test the model:

- An injection of significant investment and capital funding to enable local authorities to boost the number of appropriate carers and homes in the local area that are provided in-house or in the voluntary sector. Investment in new carers or homes should be not-for-profit to rebalance the power imbalance in the care market between local authority commissioners and private providers, and to redistribute public funding away from profit and into provision for children in care.
- The collection and publication of data about the number of children who are living more than 20 miles from home. This data should be broken down into the total number of children who are living more than 20 miles from home; the total number of children who are living more than 20 miles from home due to a purposeful decision to meet the child's needs, best interests, or wishes; and importantly, the total number of children who are living more than 20 miles from home due to a lack of appropriate care placement options close to home that could meet their needs and best interests. For each year of the last decade, an increasing number and proportion of children in the care system have been

moved miles from their friends, family, schools and support networks, which can have a long-term negative impact on children's wellbeing, development and relationships. It is essential that a success measure for the pathfinders is reducing the number of children who are moved miles from home, due to a lack of sufficiency. See our recent [Gone Too Far report](#) for more information.

- Clear and transparent guidance, which sets out how children and young people, and the professionals that know them best, will play a leading role in placement decision-making processes.
- Support from national government to help local authorities and Regional Care Co-operatives to forecast effectively the type and quantity of care provision and accommodation that will be needed in the near future to meet the needs of the children who live within the local area.
- Clear and transparent processes, which set out how the views, insights and experiences of a diverse range of care-experienced children and young people will be at the heart of the development, implementation and evaluation of the Regional Care Co-operative pathfinders.

22. Do you have any additional suggestions on improving planning, commissioning and boosting the available number of places to live for children in care?

- Providing substantial and sustainable investment including through capital funding to enable local authorities to increase the number of suitable homes and carers in the local area that are not for profit (either in-house or through the voluntary sector).
- Joined-up commissioning across education, health and justice to provide the right homes and care, in the right areas, for children with complex needs across education, justice and health. Linked to this the Department of Health and Social Care and the Ministry of Justice should become corporate parents, as part of the proposed reform to extend corporate parenting responsibilities to other public bodies.
- Instead of moving to a situation where all care placements are provided or commissioned regionally, a more proportionate approach to test would be a tiered system with different strata of collaborative commissioning for different placement types. We think it would be most appropriate and effective for the majority of commissioning and sufficiency duties to remain with local authorities. However, some types of more specialist provision, such as secure care, may be better to commission collaboratively on a regional, or sub-regional basis.
- National government should help local authorities to forecast effectively the type and quantity of care provision and accommodation that will be needed in the near future to meet the needs of the children who live within the local area.
- National and local Government should take steps to encourage voluntary sector providers to develop and increase children's social care provision.
- National Government should take steps to reduce the profit being made for providing children's social care placements to rebalance the power imbalance in the care market between local authority commissioners and private providers, and to redistribute public funding away from profit and into provision for children in care.
- The Government should introduce greater market oversight and safeguards to anticipate, respond to and mitigate the risk of a provider failure of collapse, which can leave several children having to be uprooted to a new home. This could be achieved through Ofsted having

a greater market oversight role, akin to the role played by the Care Quality Commission in the health sector, or by providing local authorities with powers and funding to step in.

- There should be long-term foster care recruitment and retention strategies in place across the country, to ensure that each local area has a sufficient and sustainable number of foster carers that are able to meet a variety of needs.
- The Government should provide a national commitment that no child should be moved miles from home when this isn't in their best interests, which would inform commissioning and planning decisions.

23. Are there changes you think would be helpful to make to the existing corporate parenting principles?

We have run four workshop sessions and carried out a short survey with a group of care-experienced young people, between March and April 2023, as part of a wider project to hear about the changes they would like to see to corporate parenting responsibilities. The key points that the young people made about the existing principles and how they should be changed are listed below:

- There should be a principle for local authorities and other prospective corporate parents to proactively take steps to eliminate discrimination, prejudice or stigma that care-experienced children, young people and adults face; and create equality of opportunity and outcome for care-experienced people:
 - Young people wanted to see “positive discrimination practice”, and “affirmative action” to prevent and mitigate against the risk of discrimination.
 - “Once a child goes independent and has children of their own "corporate parents" tend to stigmatise their young people and say they cannot parent because they have never seen it.”
- Corporate parents should be accountable to care-experienced children and young people for how they are fulfilling the corporate parenting principles and their role as corporate parents:
 - “Creating a mechanism to hold corporate parents to account, which should include penalties”.
 - “Corporate parenting responsibilities should be specific and corporate parents should be held to account against them in a measurable way”.
 - “I would ensure there is a way to check that they have met the principles”.
 - “Most of them are not being met to a sufficient standard. They need to be enforced”.
- The principles should include the need to communicate sensitively, consistently, proactively and transparently with care-experienced children and young people, including by ensuring that they are made aware of and understand their rights and entitlements:
 - Corporate parents should have a “duty to communicate regularly”.
 - Corporate parents should “advertise” and provide “transparency about provision / support services”.
 - “Corporate parents shouldn't just be available 9am-5pm Monday to Friday”.

24. Which bodies, organisations or sectors do you think should be in scope for the extension of the corporate parenting principles - and why?

We have run four workshop sessions and carried out a short survey with a group of care-experienced young people, between March and April 2023, as part of a wider project to hear about the changes they would like to see to corporate parenting responsibilities.

Amongst the young people we worked with there was broad support for an extension of corporate parenting responsibilities to a broad range of organisations, bodies and sectors. The main organisations and sectors that the young people highlighted are listed below:

- **The NHS** – There was strong support amongst the young people for extending corporate parenting duties to the NHS, due to the challenges that some care-experienced young people face in accessing appropriate and timely mental and physical health support. National health bodies, such as NHS England, should become corporate parents due to their strategic and oversight role, but there is also an argument for local health bodies too that provide, plan and deliver local health services, such as clinical commissioning groups. One young person highlighted that the “NHS already make decisions with you like a parent”. Another young person highlighted a concern about individual health practitioners, such as counsellors or therapists, having corporate parenting responsibilities, and whether this could lead to a conflict of interest when care planning.
- **Education providers** – Young people highlighted a range of education providers that they would like to become corporate parents, including schools, further education and higher education institutions. In particular, young people highlighted the tailored support or policies that education providers could adapt, including specific opportunities or grants for care-experienced students.
- **Government Departments** – Young people were very keen on the idea of corporate parenting responsibilities being extended to certain Government Departments as a way of ensuring that Ministers, Government and Officials proactively and strategically put care-experienced children and young people at the heart of their plans; and to create greater accountability. The Departments that were specifically highlighted by the young people we worked with were the Department for Education, the Department of Health and Social Care, the Department for Levelling Up, Housing and Communities, the Ministry of Justice, the Department for Work and Pensions, and the Department for Digital, Culture, Media and Sport.
- **The police** – Several young people suggested that they would like to see corporate parenting responsibilities extended to the police for several reasons, including to provide better protection to care leavers; to reduce discrimination and stigma in the way that the police interact with care-experienced young people; and given the way that children in care are sometimes criminalised for things their peers wouldn't be, such as damaging furniture within the home.
- **The justice system** – Young people suggested that there would be benefits for different parts of the justice system having corporate parenting responsibilities, for different reasons – including victim support, the courts and legal professions.
- **The transport system** – Some young people highlighted the specific barriers that care-experienced children and young people face in accessing affordable public transport, or learning to drive; and suggested that corporate parenting principles should be extended to transport providers and the Driving and Vehicle Licensing Agency (DVLA).
- **Regulators, inspectorates and ombuds-organisations** – As well as providers, young people thought it would be important to consider the role of regulatory organisations that inspect, regulate or drive practice and behaviour across a number of sectors. The organisations that were specifically mentioned included Ofsted; the Care Quality Commission (CQC); and Ofcom, for the

potential role it could play in addressing stigma, and promoting positive or balanced media representation of care-experienced children and young people.

- **Sport, arts and cultural organisations** – The group of young people highlighted a number of arts, cultural or sports organisations they would like to see as corporate parents including Sports England and the Arts Council. Several young people highlighted the barriers that care-experienced young people can face in accessing training, employment or participation in the creative industries, and thought that, as prospective corporate parents, cultural or creative bodies could develop specific pathways, jobs or opportunities for care-experienced young people to address these barriers.
- **Job centres and the DWP** - Several young people felt that corporate parenting responsibilities should be extended to job centres (JCPs) and the Department for Work and Pensions to address the disproportionate conditionality that care leavers face; and to provide enhanced support in helping care leavers access appropriate employment and training.
- **Other providers** – Young people highlighted a range of other organisations or sectors that provide services to care-experienced young people who should be considered as prospective corporate parents. In particular, these included housing providers to reflect the disparities that care leavers face in accessing appropriate, safe and affordable housing; and employment, training or apprenticeship providers to reflect the disproportionate number of care leavers who are not in education, employment or training.

The young people we have worked with also commented on the types of activities or actions that they would want new corporate parents to undertake. Some of the key elements included:

- Engaging with care-experienced young people about their views and experiences;
- Providing direct support to care-experienced young people;
- Adapting their existing policies, or adopting new policies, to make the system fairer for care-experienced young people;
- Offering training, employment or grants specifically to care-experienced young people;
- Addressing stigma by increasing awareness and tackling ignorance and discrimination;
- Asking the young people they interact with if they are care-experienced; and
- Monitoring care-experienced young people's access and outcomes for their services.

In relation to recent press reports that the Home Office could become 'the' corporate parent for unaccompanied asylum-seeking children and taking over responsibility for 'placing' migrant children, we want to make explicitly clear our strong opposition to this. Responsibility for providing accommodation for children in care, including unaccompanied asylum-seeking children, should remain with local authorities. All children in care should be equally protected by the provisions of the Children's Act 1989 and these protections should always be given stronger legal weighting than any Home Office decisions.

25. Do you have any further feedback on the proposals made in the 6 missions of this chapter?

Leaving Care Grant – We welcome the increase in the amount of the Leaving Care Grant from £2,000 to £3,000, but this needs to be established as a minimum amount, not a recommended amount. The Government should also commit to increase the Grant, and other financial entitlements for care leavers, regularly in line with inflation.

Staying Put and Staying Close schemes – We were pleased to see the commitment to roll the Staying Close scheme out as a national entitlement across the country. We also welcome the commitment to extend both the Staying Put and Staying Close schemes to the age of 23, though

we do think both schemes should be extended to the age of 25 in line with other entitlements, rather than creating another arbitrary cliff edge for young people leaving care. We were disappointed that the Government did not accept the recommendation from the Independent Review of Children's Social Care to make the Staying Put scheme an opt-out entitlement, enshrined in law.

We think it is imperative that these reforms are legislated for at the earliest possible opportunity, so that children and young people who are currently in or leaving the care system can benefit from these reforms.

Instability experienced by children in care - One significant omission in the strategy was a lack of any proposals to properly address the instability that children in the care system consistently experience, such as increased accountability measures or any targets to reduce instability. We recommend that:

- The development and publication of national and local strategies to increase the provision of care placements close to home, including through substantial and sustainable national investment, and capital funding;
- New national and local data is recorded and collected on the number of children in care who are separated from their siblings; and the number of children who are living more than 20 miles away from home due to a lack of appropriate options in the local area that were able to meet their needs and best interests.
- Increased accountability for national Government and local authorities.

Housing – We were really pleased to see some of the proposals to reduce care leaver homelessness. We think it is imperative that legislation is brought forward as soon as possible to enshrine some of these proposed reforms in law - such as the removal of homelessness intentionality and the local area connection requirement for care leavers seeking housing – and so that young people leaving the care system today and in the future are at a reduced risk of homelessness. We would have liked to see more proposed action in Mission 5 to support care-experienced young people to access tenancy deposit schemes as well as rent guarantor schemes, as this is an ongoing barrier preventing equal access to the private rented sector.

Mental health – We welcome the commitment to provide more mental health training for professionals that work with children in care. However, we were disappointed that there weren't specific commitments focused on improving access to timely, trauma-informed and consistent mental health support for care-experienced young people, given the disproportional risk they face of experiencing poor mental health.

Financial support – Too many young people leaving the care system start their lives in relative poverty; whilst young people leaving care have greater financial pressures and responsibilities than their peers, generally without the same level of familial financial support to fall back on if they experience a financial crisis. We think that one significant omission from the Government's reform strategy was any measures to provide valuable financial support for care leavers, particularly as they face specific challenges compounded by rising living costs. We would like to see an extension of the higher standard allowance within Universal Credit being extended to all care leaver under the age of 25. There is already precedent in the system where care leavers have been given differential treatment (e.g. Shared Accommodation Rate exemption) and this would align with existing enhanced support to age 25.

Prescriptions charges for care leavers – We welcomed the focus in the Government’s strategy to extend access to NHS Prescription Prepayment Certificates for care leavers who have ongoing medical conditions and struggle to pay for prescriptions. However, we think that reforms should go further than this and the Department of Health and Social Care should exempt all care leavers from prescription charges to the age of 25. This would reflect the extra financial pressures and responsibilities that care-experienced young people face, and the lack of familial financial support that they often receive.

Supported accommodation – We were extremely disappointed that the Government has rejected the recommendation from the Independent Review of Children’s Social Care that all children under the age of 18 should live in settings that provide care, no matter where they are living.

Lack of investment – We are concerned about the lack of investment that has been allocated to implement the proposed reforms in the six missions, which is a fraction of what is needed to reform the care system or to make the Government’s vision a reality. The reform proposals need to be underpinned by significant and sustainable investment from the Treasury to pump-prime reforms that improve children’s social care. If we are serious about improving children’s lives and transforming children’s social care it is critical that we provide local authorities, and others, with the resource they need to deliver transformational change.

26. Overall, to what extent do you agree that our proposals on the social worker workforce address the challenges in the system? [Select one from: Strongly agree; Agree; Neutral (neither agree or disagree); Disagree; Strongly disagree; Don’t know]

N/A

27. If you want the proposals to go further, what would be your top priority for longer-term reform?

We think that reforms to the children’s social care workforce should be focused on improving the experience of care, the opportunities and outcomes for care-experienced children and young people. The three main priorities that we have heard from care-experienced children and young people about how workforce reforms could impact on their experience of care are:

- Enabling social workers to have the time to see and communicate regularly with the children they work with. This should be regular, consistent communication that meets the needs and preferences of the child or young person. It is important that this is both proactive and reactive – with social workers proactively reaching out to and checking in with the children they work with, but also being approachable and available when needed.
- Ensuring that children in care experience stable and consistent relationships with social workers. Too often children in care face a revolving door of professionals and have to regularly build new relationships when their social worker, or other professionals, change. This can have a negative impact on the quality of the relationship, or in building trust, as children may feel that it isn’t worthwhile opening up to, or trusting, a new social worker, when experience has shown them that this relationship will only be short-term.

- Ensuring that social workers have the right level of training, skills, knowledge and experience to be able to meet the needs of the children they work with, or to be able to respond positively to any situation that a young person may present them with.

28. Beyond the proposals set out in this chapter, what would help ensure we have a children’s social care system that continues to share and apply best practice, so that it learns from and improves itself?

One major change that would help to ensure that the children’s social care system is able to learn and improve would be to improve the collection and publication of data about the instability that children continue to experience in the care system.

Too often, children’s experience of the care system is characterised by instability – experiencing multiple placement or school moves, being separated from siblings, or being moved miles away from their home, friends, family, school and support networks, due to a lack of appropriate options close to home.

Having more comprehensive data, would help leaders and practitioners to understand the true scale of the problem, and to better enable evidence-based policy-making at both a local and national level. It would allow for more effective evaluation of strategies designed at reducing the instability that children in care face, and would create an accountability mechanism to evaluate the efficacy of strategies against. In particular, we recommend that data should be collected and published on:

- the number and proportion of children in care who are separated from their siblings; and
- the number of children living more than 20 miles from home due to a lack of appropriate care placement options close to home that could meet their needs and best interests.

For similar reasons, we also recommend that more comprehensive data should be collected on the outcomes experienced by children in care and young care leavers, particularly in relation to health and educational outcomes.

Another change that would drive learning and improvement, would be stronger enforcement of existing duties, or stronger duties on local authorities to develop and update sufficiency plans.

Local authorities are already supposed to develop sufficiency plans, setting out how they will provide sufficient appropriate accommodation in their local area for children in care, in line with statutory guidance. Yet, the [What Works Centre for Children’s Social Care reported](#) in 2022 that 44% of local authorities had not published a sufficiency strategy or demonstrated publicly how they planned to provide sufficient suitable accommodation to meet the needs of children under their care.

[Research](#) has shown that some practitioners have been unaware of their local authority’s wider strategy regarding sufficiency, and individual placement decisions made by practitioners have not been in line with the local authority’s sufficiency strategy. Having a published, and well-shared sufficiency plan, could drive conditions for effective practice by ensuring consistency in the way that placement decisions are made, which reflect the authority’s wider strategy for improving

sufficiency. This could lead to more children being moved to homes within the local area that are able to meet their needs, constantly providing more stability.

29. In your opinion, how can we ensure the delivery of reform is successful?

We think that the following elements are important in ensuring that the delivery of the proposed reforms in the Stable Homes, Built on Love strategy has the best chance of being successful, and improving the lives and life chances of care-experienced children and young people:

- Ensuring that care-experienced children and young people are actively and meaningfully involved in the design, implementation and evaluation of reforms. This should include being involved in the development of the success measures by which the reforms are measured. We recommend that the Department for Education co-develop and publish consultation standards to provide a clear commitment about how care-experienced young people will be consulted about changes to the care system.
- Providing significant and long-term investment to meet the scale of the challenge in transforming the children's social care system, and ensuring that all care-experienced children and young people are able to grow up and thrive with the safety, stability and love they need.
- Increased accountability measures in relation to the instability that children in care face, with the aim of ending and reversing the negative trends of increased instability. We recommend that national and local data is collected on the number of children in care who are separated from their siblings; and the number of children who are living more than 20 miles away from home due to a lack of appropriate options in the local area that were able to meet their needs and best interests. We think there should be greater accountability and transparency such as an annual report to Parliament on the stability experienced by children in the care system.
- A cross-Government – and cross-sector approach to implementation – which is joined up, and has Ministerial oversight and accountability through a Cross Ministerial Board on Children's Social Care.
- An ambitious and fast-paced implementation strategy, including through the introduction of primary legislation as early as possible, that reflects the urgency needed to reform the system for children currently in the care system.
- An evaluation framework with success measures that are grounded in the outcomes experienced by care-experienced children and young people, including in relation to education, employment, interactions with the justice system, physical and mental health, relationships, financial security and stability.

30. Do you have any overall comments about the potential impact, whether positive or negative, of our proposed changes on those who share protected characteristics under the Equality Act 2010 that we have not identified? Where you identify any negative impacts, we would also welcome suggestions of how you think these might be mitigated.

A number of groups of care-experienced children and young people who share certain protected characteristics experience specific barriers or challenges when in or leaving the care system, including disabled children, LGBTQ+ children, and Black children and children from other ethnic minorities. Children from other population groups outside of the protected characteristics covered by the Equality Act 2010 can also face specific issues: for example unaccompanied

asylum seeking children, and children from poorer socio-economic backgrounds are disproportionately represented in the care system.

Improving the availability of existing data sources and evidence that is disaggregated by protected characteristics, and other criteria such as immigration or socio-economic status would enable a better understanding of the disadvantages and disparities that some care-experienced children and young people can face, and would provide better information to base policy decisions on. For example, we recommend that the Department for Education record and publish disaggregated data on the rates of children in different settings, care leaver activity rates and data about the suitability of care leaver accommodation by protected characteristic.

We have heard from the care-experienced children and young people that we work with about instances where they, or their siblings, have been moved to areas that are different to their ethnic, cultural, religious or linguistic heritage, which can have a significant detrimental impact on their wellbeing, relationships and sense of belonging. The National Children's Social Care Framework should make clear that a child's religious and cultural background should always be a major factor in placement decision-making.

We think that more should be done throughout practice to ensure that care-experienced children and young people are always able to access trauma-informed, and culturally- and identity-sensitive services. For example, one of the young people that we work with highlighted that "name changes should be made on records if pronouns have changed".

31. Do you have any overall comments about the potential impact, whether positive or negative, of our proposed changes on children's rights?

We are highly concerned that the Government has rejected the recommendation from the Independent Review of Children's Social Care that all children under the age of 18 should live in settings that provide care, no matter where they are living. We strongly oppose the proposed regulatory regime for supported accommodation for 16- and 17- year olds – this risks creating a two tier system, leaving 16- and 17- year olds without the care that they need. This is in contravention of Article 1 of the UN Convention on the Rights of the Child (UN CRC), which the UK is a signatory to, that all rights should be applied to all children under the age of 18.

Our [research](#) has shown that, despite obligations on local authorities, more and more children each year are being moved miles away from their home, friends, family, schools and support networks. For many children this can have a significant and long-term negative impact on their wellbeing, development and relationships. There are legitimate reasons why some children are moved miles from home, such as to safeguard them from home, or to move closer to a family network. However, too often this is due to a lack of appropriate homes that can meet their needs in the local area, which leads to them being moved far from home when it is not in their best interests – in contravention of Article 3 of the UN CRC.

There needs to be action now to end this damaging trend. We are calling for:

- A national commitment that children should not be placed miles from home when it is not in their best interests;
- The development and publication of national and local strategies to increase the provision of care placements close to home, so that children don't have to be moved miles from their support networks;
- New data collection and reporting on the numbers of children who are inappropriately moved miles from home; and

- Increased accountability for national Government and local authorities.

In line with Article 12 of the UN CRC, respect for the views of the child, we recommend that the Department for Education should develop clearer mechanisms for ensuring that a diverse range of care-experienced children and young people are actively and meaningfully involved in the design, implementation and evaluation of these reforms. The Department should also introduce standard consultation principles for transparency and to make sure that care-experienced children and young people are meaningfully involved in policy-making that affects their lives going forward.

In line with Article 24 of the UN CRC, we welcome the proposal to improve the understanding and skills of social workers and other practitioners to be able to respond to children's mental health needs. However, care-experienced children and young people are at an increased risk of poor mental health and low wellbeing in comparison to their peers; and we hear too often from care-experienced young people who have been unable to get the mental health support that they need. We think more action is needed to improve access to timely, trauma-informed and consistent mental health support for care-experienced young people.

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