

Response ID ANON-8B14-Z5QD-3

Submitted to Children's social care strategy: Stable Homes, Built on Love
Submitted on 2023-05-11 16:28:53

About you

1 We want to hear from children in care and care leavers, as well as others in this consultation. Are you:

An organisation

If you are responding on behalf of an organisation, what is the name of your organisation?:
The London Innovation and Improvement Alliance (LIIA) (RIIA)

2 To help us analyse responses, please tell us in what capacity are you responding to this consultation? As a...

Other (please state)

If other, please type in here and specify. :
The London Innovation and Improvement Alliance (LIIA) (RIIA) on behalf of the Association of London Directors of Children's Services (ALDCS)

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

Please select what is your role within the organisation:
Corporate/Administrative

4 Would you like us to keep your response confidential?

If you would like your response to be kept confidential, please explain why:

5 In sharing findings from this consultation, may we quote from your response?

Yes, attributable to my organisation

6 This question is only for adults over the age of 18, or organisations.

Yes

If you are content to be contacted, please provide your email address. :
administrator@liia.london

Questions for Children and Young People

1 What difference do you think our 6 ambitions for change will make to the lives of children and families?

Not Answered

What more, if anything, could make things better?:

2 If a friend told you they were having serious difficulties with their family at home and they wanted help, which trusted adult would you recommend they speak to?

Please comment below:

3 Do you think the missions for children in care and care leavers are the right ones to focus on?

Not Answered

Please comment below:

4 What makes, or would make a great social worker?

Please comment below:

5 If you were the Prime Minister, what would be the most important thing you would want to change in children's social care?

Please comment below:

6 What did you think of the children and young people's guide?

Not Answered

If you want to give further feedback, what could we do next time to make it better?:

7 In the future, what do you think is the best way to ask children and young people what they think about our plans for children's social care?

Please comment below:

8 How old are you?

Not Answered

9 Are you:

Not Answered

Chapter 1: Our vision & making reform work for everyone

1 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?

Agree

If desired, please briefly explain your answer :

ALDCS welcomes the identification of the six pillars as the areas of focus fundamental to supporting children's social care reform. There are many welcome changes and developments in the strategy, but a number of proposals require further consideration to be sure that the desired impact and outcomes are achieved and that they do not add to the already considerable challenges facing children, young people and families and the services that support them.

While welcoming the six pillars, ALDCS propose a seventh should be added in relation to addressing equalities; reflecting the impact of the intersecting issues of structural inequality, racism and poverty as key shapers of the children's social care system. While the implementation strategy makes references to the impact of inequalities, the proposed actions remain largely in the domain of reform of children's services. Without committed cross-governmental action to address child poverty and racial disparities, the demand for services and unequal impact of intervention in the lives of children and families will go unchecked. A further equalities issue where the strategy should be stronger is in the degree of attention given to the duties towards disabled children and enhancing their outcomes (see below in responses to chapter 2).

The consultation questions provide some scope to respond to the specific opportunities / challenges identified by ALDCS for each of the six pillars, other than pillar 2 A decisive multi-agency child protection system. Responses to pillar 2 are therefore reflected in this section of the consultation.

A decisive multi-agency child protection system

(1) Child Protection Lead Practitioner role:

- The creation of a child protection lead practitioner role is central to the reform proposals to improve child protection social work. ALDCS members understand the imperatives behind this but are concerned about inadvertently creating a two-tier children and family social work workforce.
- It is already difficult to retain practitioners in direct practice roles with families beyond five years, as many seek less intensive and stressful roles. An absolute focus on investigation is likely to add to already considerable retention and burn out challenges.
- Without careful thought and framing, the child protection lead practitioner role risks segregating aspects of practice, at worst becoming an investigating social worker role, which could run counter to the relationship-based, family first aims expressed throughout the implementation strategy. Child Protection Practitioners will need to deliver relationship based practice as they do now, just as much as this is delivered through Family Help.
- ALDCS members are clear that thresholds around the use of child protection lead practitioners should be locally determined, contingent upon a range of local factors, including workforce profile.
- The strategy envisages integrating the child protection lead practitioner role with the broader family help approach, however, without very careful consideration in its implementation, the specialist nature of the role risks creating the type of hand-off the reforms are seeking to reduce.

(2) A strengthened multi-agency approach

ALDCS considers the strategy would be strengthened by inclusion / consideration of the following:

- DfE should articulate a vision for multi-agency working, in conjunction with the Home Office, Department of Health & Social Care plus any other relevant departments and agencies, including co-location, alignment of services and the necessary leverage to make this happen. The current proposals are wholly inadequate in this regard and provide no clarity about how the necessary and adequate resourcing from other agencies will be forthcoming.
- The 2004 Act sited accountability for outcomes for all children in a local area with the DCS but to this point this has not been backed by sufficient powers to fully realise the benefits of this unique role. This was recognised in the McAllister Report, but the implementation strategy has missed the opportunity to strengthen the DCS's role.

- LA's continue to provide the majority of funding for the existing safeguarding partnership and typically host and employ support staff; setting clearer guidance on financial contributions may assist with greater ownership and buy-in from all safeguarding partners. Financial contributions to Local Safeguarding Children's Partnerships in London are not equitable, but no mechanism exists to address this. The low level of contributions from the Police was called out in Alan Wood's review but had led to no change.
- This is an opportunity to take stock and think about how to use the reform programme to improve our readiness to respond to both existing and future harms, which are likely to have a technological element to them. The strategy is largely silent on the dangers of on-line harms and the potential exponential growth in digital harm (including digital neglect, the role of artificial intelligence, the multi-national dimension of abuse) which is likely to be a driver of future child protection demand.
- The action to respond to adolescent risk outside the home to be insufficient. While it is recognised that Working Together will be revised to give stronger guidance, the proposals in the strategy do not promote confidence that the specific challenges of keeping adolescents safe will be addressed either in the new statutory guidance or the implementation of the Stable Homes strategy. Confidence is further dented by the absence of risk outside the home (ROTH) pilots in London, which would provide insight and test the ROTH pathway against the specific challenges of keeping adolescents safe in the Capital. There should be further ROTH pilots initiated which include London.
- A clearer articulation of expectations for school / education providers would help partners consider and develop the right arrangements locally. It is important to make clear that schools will have the same responsibilities as the three existing statutory safeguarding partners. A requirement to develop a local area partnership agreement that endorses the representatives for the education system within the safeguarding partnership would provide clear direction to education providers regarding their role and responsibility. Additionally, the government could act to enable local schools forums to make a contribution to the partnership via the dedicated schools grant.
- The Care Review rightly recognised that many of our most vulnerable children are known to the youth justice system yet the implementation plan continues to suggest these are not children requiring the same care and protection as others. It is disappointing that there is no aspiration articulated in the strategy to bring the YJB and responsibilities for children in the justice system under or closer to the DfE. Children in custody are acutely vulnerable (as most recently demonstrated by the urgent notification from HMI Prisons in respect of the appalling conditions in Cookham Wood). There is nothing in the strategy which suggests activity to promote the safety of children in custody or others in the justice system.

2 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?

Please comment below:

While the commitments referenced in the strategy are helpful, it is important that all of central government commits to a set of ambitions, principles and, where required, ways of working together to enable disabled children with complex needs and significant impairments to live as normal a life as possible, in their community, with their family and carers. The strategy should go further in describing cross-departmental policy commitments and associated actions which provide for more integrated and effective support to disabled children.

It is recognised that major reform is planned in relation to SEND and alternative provision, however, the strategy would have benefited by focused actions to join-up policy initiatives for disabled children and their carers. This should include more explicit reference to the role of health in provision for disabled children and those with complex needs, both in preventative and specialist responses, alongside children's social care. This join-up should aim for swift intervention and help to maximise children's development and realise their potential in community settings with parents / carers to enable access to high quality tailored help and support.

Important reforms around personalised budgets are not working effectively and could have been addressed within the strategy. A shared legal and policy framework would ease pathways for children and parents who have to be their own care manager, navigating a landscape in which services and professionals are too fragmented often operating within siloed systems. The challenges within this context are exacerbated by a wider workforce crisis which means it is difficult to secure carers.

Chapter 2: Family Help

1 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?

Fully supportive

If desired, please briefly explain your answer :

ALDCS supports the move towards an integrated approach to family help, which promotes continuity in relationships and consistency for children and families. The attention to early help offers the potential to reinvigorate these services and to develop the workforce. There are, however, significant considerations in relation to the current strategy that need further consideration. These are:

- The Early Career Framework (ECF) will need to identify the distinct role of social workers in family help services. It will be important to understand from the outset who has oversight of what, who makes decisions and when, particularly when dynamic risks are being held by a varied and potentially multi-disciplinary workforce. The testing and subsequent roll-out of these arrangements will require careful sequencing and alignment with an amended inspection framework.
- Further discussion is needed about the criteria and mechanism for escalation to a social worker and/or child protection lead practitioner, along with

issues of consent.

- It is right to seek solutions within families and to sustain them where possible where it is in the child's best interests to do so, but the child's needs and rights must remain at the heart of everything that we do.
- The full buy-in and support of all relevant government departments and agencies is needed, as are levers to realise the full benefits of family help.
- The impact of poverty on family functioning cannot be underestimated and reforms to children's social care cannot be treated in isolation. ALDCS would want to see these reforms rooted in a child poverty strategy and national plan for children.
- A test and learn approach to these major structural reforms is welcome. In view of the size, complexity and diversity of the Capital (within the population and between authorities) two of the Family First Pathfinders should be located in London. Here, as elsewhere, the learning from pilots and implementation activity should be closely aligned with the RIIA structures and DfE should build upon previous investment in regional collaboration.
- Learning from the first two years of implementation should form the basis of a financial case which recognises the need for significant investment (at least a further £2 billion) to realise the benefits of family help and related reforms. The Care Review made clear both that without this investment, the wider aspirations of the Review would not be realised; and made a clear and detailed fiscal case for this investment. It is disappointing that the government has not accepted those arguments and appears to have pushed any investment decisions until after the next general election.

2 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?

FH2 - The service is designed together with the input of children and families:

3

FH2 - It is based in local communities, and sits alongside other services such as education, libraries, citizen's advice services and housing services:

FH2 - Information and support are available and can be accessed online:

FH2 - Information and support are available and can be accessed in person:

FH2 - Early help is delivered by voluntary and community sector as well as the local authority and their partners (police and health):

2

FH2 - Strong relationship with one key worker/lead individual for every family:

1

FH2 - Having people with the right knowledge and skills available to help when needed:

FH2 - Having people with the right experience available to help when needed:

FH2 - Being able to access the right type of support:

FH2 - Other (please specify):

If you selected "other", please describe the feature which you think makes early help supportive for families:

Chapter 3: Parental Representation in Child Protection

1 Have you ever provided or received parental representation during the child protection process?

Other.

If you selected "other", please briefly describe how you have received or provided a form of parental representation during the child protection process.: London authorities have developed a range of approaches to parental representation. As well as piloting new arrangements over the next two years, it will be important to map existing approaches to ensure there is the opportunity to learn from existing practice.

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

Please describe your experience of a form of parental representation. In answering, please do not provide any personal details about the child protection case you were involved with. :

n/a

3 If you are happy to or would prefer to talk to us further about your experience with a form of parental representation in child protection processes, please indicate your consent to be contacted in relation to this set of questions only.

Not Answered

Please enter email address here:

Chapter 4: Unlocking the potential of Family Networks

1 In your view, how can we make a success of embedding a "family first" culture in children's social care?

Please comment below:

Many LA's have sought to promote a family first approach and the enablers within the strategy which will support going further in empowering families are welcome. In London there is already a well-developed family first culture (the prevalence of Special Guardianship Orders in London provides evidence of this) and support to draw upon the power of family networks will enhance this approach. In this context of a welcome direction of travel the following points do need careful consideration:

- Proposals in the implementation strategy could significantly increase the number of families LAs are engaging with and as such, create a significant new resource requirement for LAs.
- The involvement of children's social care in brokering or supporting informal family arrangements hitherto arranged without the intervention of the state, financially or otherwise, could be viewed as an intrusion into family life. It could also result in large numbers of families being assessed and held open on our systems, even if there are no identified or ongoing help and support requirements.
- Routing payments via the welfare system and a 'child benefit plus' approach allows funding to be attached to the child and carries less stigma than involvement with children's social care. The cost of administering payments will be significant and are likely to be accompanied by a review function, which could be open to legal challenge, as well as audit and assurance requirements.
- Many LAs do provide some financial support to special guardians but packages vary based on LA and on family. Consistent and enhanced provision of financial support to these arrangements will support more children to stay within their family network. This extent of this new financial burden on LAs needs to be properly understood and fully funded before roll-out.
- Acknowledgement that previously looked after children are likely to have needs that fluctuate and caring for children is a lifelong commitment and will likely require additional support at different times across their childhoods. Family led decision making could be better supported through access to an enhanced system of financial and practical support available to Special Guardians and Connected Carers – similar to that employed via Direct Payments/ASF's to provide greater levels of autonomy.
- Portability of information/plans for children between different Local Authorities would be helpful to consider to promote greater level of consistency. With the purpose that families are not finding themselves subject to repeated assessment and review process.

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

Please comment below:

While the consistent provision of financial support to enable children to remain within family networks is important, there is much else that needs attention if the power of these networks is to be realised.

- The implementation plan seemed to place too much emphasis on the provision of funds and not enough on wider and ongoing support for family networks to care for children. A more comprehensive offer is needed in terms of training, skills, mentoring. There may be a role here for the voluntary sector to provide kinship support in an area, potentially drawing on models of support to adoptive carers. The active and ongoing support of other partner agencies e.g. health and schools is also necessary.
- Greater focus is required on the support of partners and cross-government sign up and ownership to the plans set out in the implementation strategy, which at present is primarily focused on LAs and the DfE. Additionally, the implementation plan does not yet include a clear longer term support offer to kinship families, an adoption support fund style commitment might usefully be considered to prevent arrangements breaking down.
- The implementation plan proposes further testing and research into the efficacy and use of family-based decision making via the proposed pathfinders, however, there is already a sufficient body of evidence in this space along with good practice to draw on which should enable progress to be made more swiftly than is currently planned through piloting.
- More effective use of multi-agency/ SEN/ Early Help plans in relation to children who were previously Looked After and now being cared for by family members, to include reference and guidance for schools linked to appropriate use of Pupil Premium support.
- An acknowledgment of the ongoing financial commitment required to raise a child and to provide compensatory enrichment opportunities, that needs to be supported by provision of sufficient resource.
- Provision of FGC's and Family Coaching as a working principle to support in planning and in the management of family dynamics and early planning.
- Consideration to be given to facilitation of Kinship support networks for children and families, to enable voice and influence in relation to ongoing development of practice in this area of work. Similar to Fostering networks, supporting scrutiny and challenge.

3 What support does your local authority provide to Special Guardians or to a non-parental party with a Child Arrangements Order?

FN1 - A means tested financial allowance:
Special Guardian, Child Arrangements Order

FN1 - A non-means tested financial allowance:
Special Guardian, Child Arrangements Order

FN1 - Access to training:
Special Guardian, Child Arrangements Order

FN1 - Access to free legal advice:
Special Guardian, Child Arrangements Order

FN1 - Access to information about becoming a kinship carer:
Special Guardian, Child Arrangements Order

FN1 - Don't know:

FN1 - Other (please specify below):

If you selected "other", please describe the type of support here:

4 To what extent are you supportive of the working definition of kinship care?

Fully supportive

If desired, please briefly explain your answer :

Nothing to add in agreement with working definition.

Chapter 5: The Care Experience

1 Overall, to what extent do you agree that the 6 key missions the right ones to address the challenges in the system?

Agree

If desired, please briefly explain your answer :

The missions seem to cover the right areas. However, the level of detail and commitment in each is not sufficient. We would want to ask the following questions:

- Staying Close – what will the expansion to fund Staying Close and build this in 50 LA's mean in practice? How will those LA's access this support and opportunity?
- Joint housing protocols (CS/LA) – why were these not made statutory, with expectations around priority need till 25 and intentional homelessness built into them? When will statutory guidance and procedural expectation on IH be issued and what will this look like? On what will a decision around legislation depend on?
- When will legislation to remove the local connection test be proceeded with? This is seen as critical by care leavers and those supporting them. It relates to not just accommodation but ETE, health and other outcomes for those Care Leavers looking to build an independent life outside of their responsible borough.
- When will the findings from What Works for Early Intervention and Children's Social Care (WWEICSC) survey of best practice in meeting Care Leavers Mental Health needs be published (due spring '23)?
- What will the £30 million allocation to developing family finding, befriending and mentoring look like? What specifically will it fund and how will this be accessed?

2 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?

Neither agree nor disagree

3 What would you see as the advantages or disadvantages of formally recognising a lifelong bond in law?

Please comment below :

There would seem to be advantages if it transfers the same legal and financial protections available to parents and their children. The recognition in itself may also be important to care leavers in terms of emotional security.

An important question is what type of relationships could be recognised in these arrangements. Would it be restricted to extended family, or could it be a foster carer, mentor, or any other relationship identified as important by both parties?

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

Please comment below:

Response reflects ALDCS position and discussions with DfE on RCC pathfinder:

We agree with the range of national prerequisites set out by ADCS to create the conditions which are required to make regional commissioning effective in changing outcomes, choice and cost in care placements.

ALDCS supports the national association's view that there are a number of prerequisites (as set out in the separate ALDCS submission on RCCs) for government to address to create the conditions which are required to make regional commissioning effective in changing outcomes, choice and cost in care placements. Regional commissioning will not in itself fix what the CMA describe as a "dysfunctional market", dominated by what the Care Review called "profiteering".

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

Please comment below:

ALDCS welcomes the RCC model as a regional approach to commissioning is essential to address the current dysfunctional market but sees a need for some key differences to the current proposed approach. These are as follows:

- The scale of purchasing power of RCCs must be sufficient to address the challenge. This cannot be a specified number of local authorities but needs to be determined locally. We propose RIAs have established a good track record and operate at scale. The RIAs form a network which offers the basis for RCCs, either at RIA or sub-RIA level. Working with a recognised network also reduces the risk of a patchwork set of arrangements with some local authorities omitted from local RCCs.
- The challenge of securing change in the market will require considerable focus and resource. This will not be helped if RCCs are also managing significant staffing restructures and budget transfers to achieve 'pooling'. We propose therefore that the risks of transferring placement teams and fostering teams outweigh the benefits and would distract from the core purpose. Further, the RCC can deliver regional marketing, training and support for foster carers and develop regional brokerage systems where regional impact is beneficial without the transfer of local authority teams who have local knowledge and understanding. Again, there is no need to pool budgets as a RCC, if established as a legal entity jointly owned by local authorities, can then directly establish frameworks and block contracts with providers, which achieves the same goals.
- We agree with the need to boost the number of homes to enable more children to be placed locally and disrupt the market. We propose there should be further action here, recognising the scale of the shortfall. Further capital funding should be provided in the next round to local authorities as many strong bids in the last round were not able to be funded. Innovative approaches should be developed with the voluntary sector, with partnerships that enable capital provision, which otherwise can often be a barrier. Funding arrangements should also recognise the greater risks of voids in new provision through risk sharing mechanisms with central government.
- We propose changes to the regulatory regime which currently is deterring providers from taking higher need children given the disproportionately high potential risks and impact on their provision.
- We propose clearer roles, funding responsibilities and accountability across local authority, Health and Youth Justice to support securing the right placements for children. The DfE has a central role in drawing together cross-government support to provide integrated, high quality placements for any child who is in the care of the state, be that through welfare, justice or health pathways. Specifically, there are current difficulties in securing appropriate health placements and provision, in particular Tier 4 CAMHS beds. In this context the failure to protect children in custodial institutions is a matter to which the DfE must pay greater attention and the implementation strategy should directly address.
- We propose RCCs should be tested to enable regional engagement with the market, including stimulating new provision, but offer flexibility within a national approach to accommodate commissioning at regional, sub-regional and local level.

Strengthening the residential workforce

A concerted approach to recruitment, retention and career development of residential staff by central government supported by regional activity through the RCC / RIA is needed to address current workforce challenges. A strategy to strengthen the residential workforce is key to developing the supply of quality placements for children. The following contributions are offered to support this development:

- The focus and attention on the children's homes workforce and the revival of the residential workforce census is welcomed. Beyond the census, the issues of recruitment and retention need further attention in view of the widespread challenges in children's residential care. There is a reliance on locum staff, which is exacerbated by resilience levels and high turnover rates of locum and permanent staff.
- A consistent and visible registration/accreditation opportunity and associated CPD and leadership programme for workers, outlining career pathways would be valuable in both recruiting and retaining staff.
- It would also be important to recognise the role of the Responsible Persons and the disparity of training, support and guidance available in order to strengthen those holding this role, the workforce and enable better outcomes for children.

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

Please comment below:

Corporate parenting principles could be strengthened.

A key principle will be for the responsibility for corporate parenting to include partners beyond the local authority. This would better reflect an approach of 'community parenting' as described by the Care Review.

Within the local authority, there should be a greater requirement (and specificity) to adopt a Whole Council Approach. These should require the direct

involvement of departments providing services to care leavers, with wider consideration of how all council departments can contribute. The involvement of housing departments, accompanied by a requirement for joint housing protocols that include direction around Intentional Homelessness and Priority Need should be stipulated. A clearer expectation for a 'family firm' ETE offer from the authority as a major local employer should also be encouraged. Social Value Procurement practice that benefits children in care and care leavers should be expected across the tendering of local authority contracts. Many of these areas link with the idea of adopting care experience as a 'protected characteristic'. Whether or not this formally happens in all authorities, the principle that council policy development should have consideration to its impact on care leavers is a sound one that should be reflected in corporate parenting principles.

These same principles should be applied to all partners in scope for the extension of corporate parenting principles (for example, growth of the current NHS ETE offer to Care Leavers).

The role of the Covenant in supporting corporate parenting partnerships should be clarified – there seems untapped potential in this regard. As a minimum, the incorporation of safeguarding partners as corporate parents would be beneficial in spreading responsibility beyond the LA to partners who can deliver significant benefits as corporate parents.

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

Please comment below:

Corporate parenting (or community parenting) should be formally extended to several partners, with a shared responsibility across them. These should include:

Health: Contributions that cut across all key areas of physical and mental health and safeguarding provision to children in care and care leavers. This should also include relevant transition and adult services.

Education, Training and Employment: As well as the involvement of VSH and council education services, this could include the involvement of local FE and HE providers, as well as potentially local Employers.

Housing: Promote a place called home for care leavers and prioritising as a corporate parent

Police: Predominately from a safeguarding perspective, but also as an employer.

Third Sector: Key providers of services to children in care and care leavers

Care Leavers Covenant: A clearer role and closer connection with Corporate Parenting arrangements. There seems untapped potential around the contribution they could make.

The private sector: seems keen to engage, but struggles to connect with Care Leavers or fully understand their support needs. Bringing them into corporate parenting environments could strengthen this connection.

The Pan London Care Leavers Compact

We also use this consultation to raise awareness of this project. Research has consistently indicated that there are inequities in the support available to Care Leavers according to their home borough and their current location. Care Leavers also say they are often not aware of the support available to them. The Pan London Care Leavers Compact, which received £110k of seed funding from the DfE Covid19 Recovery Fund, looks to tackle these challenges by improving the consistency, breadth and quality of support offers across local authorities (in this case the whole of London). This has resulted in securing pan-London benefits such as a 'free prescriptions' policy and 50% discounted travel from TFL. Work is underway on a wide range of other agreements, including LA housing policy, council tax exemption, and a range of partner initiatives. There are numerous efficiencies and cross-cutting benefits from working across London in this way and, particularly given the volume of care leavers living outside of their local authority, we would encourage further support of regional approaches.

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

Please comment below:

Comment for Chapter 5, Question 2: 'Neither agree or disagree' This needs really to be answered by care experienced people, however giving options and choice is key, so we presume having the option would be welcomed. The key is what this means in practice.

Chapter 6: Workforce

1 Overall, to what extent do you agree that our proposals on the social worker workforce address the challenges in the system?

Agree

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

Please comment below:

There are interlinking priorities that will enable long-term support and improvement to ensure LAs can achieve workforce stability, amongst these a focus on retention and continuing professional development (CPD) are considered highest priority. Without improved retention, workforce challenges will persist and impact on the recruitment, development and support available to the future workforce, put pressure on the existing workforce and affect the services provided to children.

The importance of career progression was evidenced through direct research undertaken in early 2023 in London and in collaboration with the South East region through the Big Listen, we heard from over 1000 social workers. 80% of respondents identified career progression as a top priority, with a higher proportion of Black & Global Majority social workers than their white counterparts (88% v 77%) stating this. Overall, regardless of their job role, all respondents equally value their career progression.

ALDCS welcomes the recognition of the importance of our workforce in the implementation strategy but would provide the following feedback on proposals:

- The impact of persistent systemic issues, exacerbated in the aftermath of the pandemic and the cost of living crisis are taking a toll on the social workers. This is both through the impact of increasing demand and complexity of workloads and individuals managing their own finances in a challenging context. This is evident from the social work census and the loss of large numbers of permanent social workers either to agencies or out of the profession. We cannot delay in addressing these challenges nationally at pace. It is important that action is also joined up to bridge the silos created by the separation of children's and adult social work.
- The expansion in the number of student social workers is welcome but this will also require an expansion in the number of practice educators. The implementation strategy needs to recognise the financial and practical challenge in freeing up practitioners to train and host student placements, requiring caseload relief and team support, for which there is currently little capacity. The number of bursaries available should also be increased to support an increase in the number of students.
- The increase in apprenticeships is welcome and in London this route is recognised as a very good career pathway for individuals who are often locally based or already working within an organisation. It is important for DfE to recognise the balance of experience required at a local level to bolster the service in order to positively support apprenticeships. Enhancing apprenticeship pathways could be explored through collaborative LA pilots and regional / sub-regional arrangements. These should also enable closer working with adults social workers and services.
- The Early Career Framework proposal is broadly welcomed, with the introduction of the expert practitioner role in years 3-5 considered an overall positive to support retention and opportunities to progress. Overall, it was felt that rather than solely providing a framework for the start of a social work career, the strategy should be more ambitious and seek to develop a national social work career structure, one that enables progression within practice roles rather than only in management.
- The current lack of a national career structure makes it harder to develop and deliver against specific CPD priorities as social workers progress their career. A national structure would provide clear expectations of requirements for social workers to develop their careers, with associated remuneration guidance. Setting out clearly the framework for progression throughout a career (such as is provided in teaching and nursing) would benefit social work, improve retention efforts and build the quality of service for children and their families.
- The support for managers to develop and strengthen leadership skills is overlooked as a key area of attention. It is well documented in research that first line management have a significant bearing on working conditions of social workers and their retention. In this regard there is also an opportunity for greater recognition in the national proposals to support and strengthen relationship-based supervision.
- Social workers told us (through the Big Listen) that addressing 'bureaucracy' is crucial, as they describe the effects as harmful and a significant reason they leave the profession (often early in their career). Agency social workers also reflected that they feel they have greater protection on caseloads, which is further adds to pressure on retention.
- Action to reduce the cost and overreliance on agency social workers is welcomed (see the ALDCS response to the consultation on the specific proposals). It is recognised that the growth in agency social worker reliance is, however, a symptom and not a cause and that a robust workforce development strategy for social work is essential to address what can reasonably be described as a recruitment and retention across the sector.
- The way in which social workers are perceived, which is very different from other professions and often with a negative bias, impacts recruitment, morale and retention. A national strategy to promote children's social work, shape and change perceptions of what children's social workers do and how they do it, would benefit at a regional and local level, enabling a more balanced representation of the profession that allows for celebration of our workforce.

Chapter 7: System Enablers

1 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?

Please comment below:

DfE have invested in RIIA's in recent years and there has been a move to integrate the RIIA work more closely with other DfE improvement activity. A recent evaluation of improvement and intervention activity (DfE, 2022) showed strong support for, and impact of, RIIAs. It is therefore surprising that the implementation strategy is largely silent on the role of RIIA and this is considered a missed opportunity. Engaging RIIA, as existing multi-LA structures for supporting improvement should be core to the implementation strategy. This would provide regional oversight and learning from pilots and pathfinders, while also providing a stimulus to core aspects of the reforms. Certain activities such as RCC development and agency regulation particularly lend themselves to working on the RIIA footprint.

The draft purpose of children's social care and the principles that underpin our work as described in the national framework are welcomed. The most obvious gap was felt to be the omission of a meaningful partnership or multiagency lens in either the framework or related data measures. On balance, it was agreed that this would best be addressed via the addition of a third enabler focussed on multi-agency partnership working.

Chapter 8: Delivery

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

Please comment below:

The test and learn approach was welcomed as the major structural reforms carry significant risks which could be damaging for children and the sector. The reforms also need sufficient financial investment through the next spending review, without which they will be impossible to deliver successfully.

In order to learn and scale, context is critical. There is no other context in England like London with its size, complexity, diversity and mass of relatively small LAs in close proximity. For the reforms to succeed in London they need to be adequately tested in the Capital (home to over two million children). It is disappointing that there are no risk outside the home pilots in London and it is hoped that where other pilots and pathfinders are awarded a significant proportion are in London.

RIAs are uniquely positioned to support the coordination of the implementation plan and should be financially supported to play an active role in enabling LAs within each region to embed the social care reforms.

Impact Assessments (Equalities and Child Rights)

1 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?

Please comment below:

ALDCS has proposed the adoption of a seventh pillar to address the impact of inequalities on children, which we know is a key driver of demand for social care services (see chapter 1 Q1 response).

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

Please comment below:

A central aspiration of the reforms is to enable more children to remain within strengthened family networks. ALDCS shares this aspiration and welcomes many of the proposals in the strategy which support this aim. In this ambition, we do, however, need to be careful not to lose sight of the rights, needs and voice of the child in our determination to draw on and listen to the adults around them. Measures which enhance children's voice and participation will be important counter-balances within the reformed children's social care system.

Evaluation of this consultation

1 Please help us to improve our consultations by answering the question below (responses to this question will not be published)

EV1 - How satisfied were you with this consultation:
Slightly satisfied

Please provide any further feedback you may have:

There are several areas in the consultation where there could have been additional questions to allow for specific contribution. We felt that in some cases there were no questions related to specific areas we would have wanted to commented on. Instead we have done our best to fit this feedback the consultation questioning elsewhere. In the future consultations we would appreciate an opportunity to directly respond to all areas in the consultation.