



Department
for Education

Consultation Response Form

Consultation closing date: 29 November 2013
Your comments must reach us by that date

Improving Permanence for Looked After Children

If you would prefer to respond online to this consultation please use the following link: <https://www.education.gov.uk/consultations>

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Please tick if you want us to keep your response confidential.	<input type="checkbox"/>
Reason for confidentiality:	

Name: Cathy Ashley	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): Family Rights Group	
Address:	
The Print House, 18 Ashwin Street, London E8 3DL	

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division by e-mail at: consultation.unit@education.gsi.gov.uk by telephone on 0370 000 2288 or via the Department's contact us page at: <https://www.education.gov.uk/help/contactus>

Please mark the box below that best describes you as a respondent.

<input type="checkbox"/> Local Authority Fostering Service	<input type="checkbox"/> Private / Voluntary Fostering Agency	<input type="checkbox"/> Child / Young Person
<input type="checkbox"/> Parent	<input type="checkbox"/> Other Relatives	<input type="checkbox"/> Foster Carer
<input type="checkbox"/> Children's Social Worker	<input type="checkbox"/> Independent Reviewing Officer	<input checked="" type="checkbox"/> Sector Organisation (e.g. ADCS, the Fostering Network, BAAF)
<input type="checkbox"/> Residential Children's Homes Staff	<input type="checkbox"/> Other (e.g. Health / Education Practitioner)	

Please Specify:

Family Rights Group is the charity in England and Wales which specialises in advising and supporting families whose children are in need, at risk or in the care system. We advise more than 8,000 parents and relatives per year about their rights and options when they are involved with, or require local authority children's services. We promote policies and practices that help children to be raised safely and thrive within their families and communities and give families a voice when decisions are being made about their children's lives. We campaign for effective support to help support struggling parents and family and friends carers who are raising children who cannot live at home.

1 Do you agree that delegated authority should be discussed at every review? If not, please explain why.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

Family Rights Group agrees that it is a positive development that delegated authority should be discussed at every review. The child's LAC review provides a critical opportunity for the child, the parents and the professional team around the child to consider all aspects of delegated authority to make decisions about the child's care and upbringing, and for their views to be heard and respected and any concerns addressed. For parents, this may mean sensitive discussion or consultation around significant issues including specified matters such as faith and religious observation (The Care Planning Placement and Case Review and Fostering Services (Miscellaneous Amendment) Regulations 2013).

2 Do you agree that the wishes and feelings of foster carers and registered managers should be ascertained and taken into account as part of the review process? If not, please explain why.

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
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Comments:

We agree that the professional views of foster carers and registered managers should be sought and considered as part of the review process. However, we recommend that the wording be amended to "views" as opposed to "wishes and feelings" which we think is inappropriate. Our proposed change would be consistent with the R (Bewry) vs. Norfolk County Council case (2010) which established that local authorities have a duty (section 22 (3) Children Act 1989) to consult with any other person the authority considers to be relevant (which in most cases will require the local authority to considering consulting with the child's current carers) when considering any care planning decisions.

3 Do you agree that foster carers and registered managers should be invited to review meetings where these are held? If not please explain why.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

We agree that foster carers and registered managers should be invited to participate in review meetings. However, this should not be in preference to parents, who hold parental responsibility where children are placed in section 20 foster placements, and who continue to share parental responsibility where their children are under care or placement orders. Therefore, parents and others with parental responsibility must continue to be invited to attend and be involved in the review (or in exceptional circumstances where a parent is excluded, their views obtained in another way), in accordance with the Care Planning, Placement and Case Review Regulations (2010).

4 Do you agree that the definition of permanence should be amended so that it encompasses long term foster care? If not, please explain why.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

We believe that long-term foster care, **including with approved family and friends foster carers**, should be included in the definition of permanence, **as one of the options**; for some children this may be the best option for them, based on their individual assessed needs.

The current proposals do not specify that long-term foster care can include arrangements with approved related foster carers. Research shows that children in family and friends care do better than those in unrelated foster care¹, with placements contribution to stability for children who cannot live with their parents, so this needs to be specifically noted when defining long-term foster care. We recommend that this be emphasised to ensure that any amendments are comprehensive and demonstrate that

¹ Farmer E *What Factors Relate to Good Placement Outcomes in Kinship Care* British Journal of Social Work p340 (2010); Selwyn J, Farmer E, Meakings S and Vaisey P (2013) *Kinship Care Report: Your Family, Your Views* (Buttle UK)

there are a range of permanence options for children.

5 Do you agree that the guidance on long term foster care as a permanence option should be amended in this way? If not, please explain why.

Yes

No

Not Sure

Comments:

Paragraph 9.2 of the consultation document suggests that the definition be amended to include the statement:

“This may include arrangements where the local authority and birth parents share parental responsibility and the carer has made a long term commitment to the child”.

However, this only applies to those cases where there is a care order in place and so parental responsibility is shared by the local authority and the parent. It cannot apply to situations where a child is voluntarily accommodated under section 20 where parental responsibility is held by the parent. Therefore, this current definition, whilst strengthening the status of long-term fostering as a permanency plan, is not accurate in relation to long-term placements under section 20. Any definition needs to encompass long term s20 placements.

Paragraph 9.3 describes how long term foster care is another route to permanency and proposes an amendment to paragraph 2.4 of the guidance to state:

“This option may be as a result of a short term arrangement where attachments have already been formed or where it has been identified that this is the most appropriate option for the child and long term foster carers have been sought as a result of this”.

As raised at the consultation meeting on 14th November, we’d recommend that this is re-phrased to delete the word “attachments” and perhaps to state where a placement was a formerly short-term arrangement or where a child has been formally matched in a new long-term placement.

6 Do you agree with the proposal to introduce a requirement for local authorities to publish a permanence policy? If not, please explain why.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

We agree with the proposed requirement for local authorities to publish a permanence policy but this must address the full range of permanence options available including return home from care, long-term foster placements (with related as well as unrelated approved foster carers) and all family and friends care options including legal orders such as special guardianship and residence orders, as well as 'staying put' options. We recommend that the guidance sets out an expectation that the permanence policy will set out fully developed policies on the different options.

We suggest that a permanence policy should make reference to and link closely with the family and friends care policy which local authorities in England are already legally required to have in place (Statutory Guidance on Family and Friends Care 2011). It is essential that family and friends care policies are not diluted in any way as a result of the proposed introduction of permanence policies, but instead that their importance and impact is enhanced.

Consideration of sibling relationships is also important in considering permanency options, and although the paper rightly recognises the need for emotional permanence in placements, we are concerned that there is no mention at all of sibling relationships in the paper as a key source (or potential source) of emotional stability and resilience for many looked after young people. We support the view of Siblings Together that: *"Sibling relationships can provide a thread of continuity and support for looked after young people even when they end up moving frequently. For many looked after children, sibling relationships are in practice their best hope of maintaining long term supportive relationships that will continue through placement changes and after they become adults and leave care"*.

We would also strongly recommend that permanence policies need to be accessible to children, parents and families and that they be fully consulted on the development of such policies, which should reflect local needs.

7 Do you agree that the proposed definition for long term foster care covers the core elements of the arrangement? If not, please explain why.

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
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Comments:

We agree with the proposed definition of long term foster care with the exception of the use of the word “accommodate” where it is stated

ii. **“F has agreed to accommodate C until C ceases to be looked after”.**

Changing the word “accommodate” to “care for” would reduce the risk of any confusion about whether the placement is a voluntary section 20 arrangement or whether the child is placed under a section 31 care order as the word accommodate is strongly associated with voluntary placements.

8 Do you agree that foster carers should be able to ask a local authority to assess them as a long term foster carer for a particular child? If not, please explain why.

Yes

No

Not Sure

Comments:

Whilst we would not disagree as such with the proposal that foster carers should be able to ask to be assessed as a long-term foster carer for a particular child, we would like to ensure that this is in accordance with the existing legal duties which local authorities have, to consult with parents before any decision with regard to a child they are looking after (section 22(4) Children Act 1989) and to give due consideration to parents’ wishes and feelings (section 22 (5) Children Act 1989).

As parents continue to hold parental responsibility for voluntarily accommodated children, and to share parental responsibility with the local authority where their child is in care under a care order, any proposed amendments must ensure that parents are notified before a foster carer is assessed as a potential long-term carer. This would ensure that parents are not undermined or marginalised in the process but are fully consulted and that they can consider applying to discharge the care order, if their circumstances have changed, or withdraw their consent if the child is in voluntary accommodation.

9 Is three months a reasonable period within which to make such an assessment? If not, please explain why.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

Three months appears to be an appropriate timescale for assessment.

However, as noted in question 8, we suggest that the parent should be formally notified before this assessment begins.

10 Do you agree with the proposal to introduce minimum requirements for a decision making process for long term foster care? If not, please explain why.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

We agree with this proposal which does make reference to providing written confirmation of the decision to parents and other person(s) with parental responsibility within 10 working days.

Again, we would add that parents need to be notified (and consulted) **before** the decision as well as **after**, in line with sections 22 (4) and (5) of the Children Act 1989.

11 Do the proposed minimum requirements seem adequate or are there others that we should consider? If so, please set out what additional / alternative requirements you think would be helpful.

Yes

No

Not Sure

Comments:

Please see our responses to questions 8 to 10 above which highlight the significance of the parents' parental responsibility in this process and the need to ensure that parents are fully informed about any proposed changes to their child's care plan, including assessment of a foster carer as a long-term foster carer for the child and the agency decision regarding this. These section 22 (4) and (5) duties upon local authorities to consult with, and consider, the views of parents before any decision with regard to a child they are looking after must be emphasised in any amendments. Parents need to have the opportunity to seek independent legal advice or advocacy and to consider their legal options in relation to any potential changes to their child's care plan.

12 Do you agree with the proposed content of the written confirmation? If not, please explain why.

Yes

No

Not Sure

Comments:

We believe that the agreement on support should include consideration of what will be required post 18 and the commitment of the LA to include in those option that the young person will remain living with their foster carers.

In our view local authorities should be required to agree to support a young person to live with their foster carers under they are 21 if this is in their interest.

13 Do you agree with the proposal to introduce a requirement for decisions about a long term foster care arrangement to be confirmed in writing? If not, please explain why.

Yes No Not Sure

Comments:

We agree as it is essential that all significant care planning decisions are confirmed in writing to all the key people, including parents. The timescale of 10 working days is a standard timescale and is appropriate.

14 Do you agree with the proposal to introduce more flexible requirements for social work visits to children in long term fostering arrangements? If not, please explain why.

Yes No Not Sure

Comments:

Whilst we acknowledge that more flexible requirements for social work visits to children who are in long-term foster placements may provide a stronger sense of normality for children in these placements we have some reservations about the current proposals.

Firstly, we would like to emphasise the local authority's duty to promote the child's welfare (section 22 Children Act 1989); one way of ensuring this is for the child's social worker to develop a relationship with the child and to be responsive to the child's developing needs and changing circumstances. Reducing the requirement for visits to children who have been in long-term foster care for at least a year to a minimum interval of six months may compromise this duty to promote the child's welfare. Visits by the child's social worker include an important safeguarding function and if less frequent then this may not always be in the child's best interests. We think it would be best if the requirement remained at intervals of three months unless otherwise recommended at the child's LAC review, also taking into account the parents' views on any changes to the requirements for social worker visits.

Whilst the current proposals do require local authorities to arrange a visit whenever

reasonably requested by the foster carer or the child (paragraph 10.22), there is no mention of a requirement for a visit to be arranged where reasonably requested by a parent. We recommend that this be included as it is a worrying omission. It also appears to be inconsistent with the statement in paragraph 8.1 that central to securing good outcomes for the looked after children, is an effective team around the child and their birth family.

We also have some concerns about how some younger or more vulnerable children may be able to request a visit and also about difficulties which may arise if there is a change of social worker for the child. Although the duties upon fostering services would not be affected under these proposals the child's social worker is a key social worker for the child.

15 Do you agree that there should be a more proportionate approach to reviews which reflects the long term nature of the arrangement? If not, please explain why?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

We are concerned that any reduction in the frequency of review meetings would not be consistent with the section 22 duty upon local authorities to promote the child's welfare. Where review meetings for a child who has been in long-term foster care are reduced to once a year we believe this is too long a gap for the child and their parents. Although the proposals allow for the Independent Reviewing Officer to still carry out the review process at six month intervals this does not allow for the information sharing and debate that a review meeting offers.

We do acknowledge that the proposals do not seek to change the current guidance which states that reviews should take place as often as the circumstances of the individual case require and that when there is a need for significant changes to the care plan, then the date of the review should be brought forward" (paragraph 4.6 of the statutory guidance).

16 Do you agree with the proposed changes to what must be covered in a child's review where the child is in a formalised long term foster care arrangement? If not, please explain why.

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

We do not agree with the proposal that the following points no longer must be considered at each review (paragraph 10.28):

- whether the responsible authority should seek any change in the child's legal status
- whether there is a plan for permanence
- whether the placement continues to be appropriate

We believe that it is essential that these areas are still considered at every review as part of the duty to promote the child's welfare and in order to assess if the care plan continues to meet the child's needs and reflects any changes in circumstances.

However, we do strongly agree with the proposal in paragraph 10.29 to add a requirement for reviews to include consideration of whether the existing support and services being provided remain appropriate as we see this as a positive development.

In relation to the second bullet point in the above mentioned paragraph which suggests that consideration be given at a review, as to whether the next review be held less than a year from that date please see the concerns expressed in our response to question 15 - we are not in agreement with any reduction in the frequency of reviews.

17 Do you agree with the proposal to introduce a requirement to clearly set out a 'return plan' before a voluntarily accommodated child returns home? If not, please explain why.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

We agree with the proposed introduction of a requirement to set out a return plan before a voluntarily accommodated child returns home. We are fully aware of the difficulties faced by children and their families if there is insufficient assessment, preparation, and support in place for children returning home from care. We would therefore welcome a duty of support to be in place which we believe should apply to **all** looked after children who return home. This support should be based on identified need rather than specific legal status or permanency plan.

Obviously, in the case of voluntarily accommodated children returning home, any continued support or services offered is based on parental agreement to this. Therefore effective partnership working between the authority and the family is vital, especially if, where this does not happen and improvements are not maintained then the child could

end up in care again. Assisting parents to engage in a meaningful way and to ask for and receive the right help for their family is an essential part of any plan to support children at home. Furthermore, referral to independent sources of advice and advocacy as early as possible or at the time of key decisions being made is crucial.

We also strongly support the statement made in the draft regulations presented alongside the consultation that the plan will cover the services and support to be provided by the local authority to the child. However, this need to be extended to providing support to the parents/family, as this is crucial to the successful reintegration of the child back into the home and in the family. It should also include support from other services or agencies which the local authority should assist the family to access.

A further key element not included in the current proposals is assessment prior to a voluntarily accommodated child going home. An assessment of need which includes both the child's and parents' needs should be the starting point for any return home plan. This should be based on genuine engagement of the child and parents (with the help of an advocate or independent advisor, if need be), a thorough understanding of their perspectives, views and needs, and shared goals which the local authority and the family agree to and which are clearly set out in the plan. The assessment also needs to address the factors which led to the child being accommodated in the first place and what support may be provided to ensure that these issues are resolved and remain resolved.

Ultimately, parents will need to be fully on board and in agreement with the return home plan as they will be responsible for implementing it. Parents need to be clear about their role in this plan and if any relevant timescales are to be applied. They should be enabled to give informed consent; again referral to independent advice and advocacy services may assist. In the case of a voluntarily accommodated child returning home it is unlikely to be appropriate for there to be specific objectives for parents or sanctions if not met but if there are they must be clearly set out and the reasons explained to parents. Effective partnership-working between the local authority and the family is essential for the return home plan to succeed.

18 Do you agree that local authorities should be required to convene a review within 10 days of a voluntarily accommodated child ceasing to be looked after as a result of being removed from care by a person with parental responsibility? If not, please explain why.

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
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Comments:

We do agree that families should be offered a review shortly after a parent withdraws their consent to a voluntary accommodation placement and returns their child to their care in an unplanned way, or where a 16 or 17 year old young person leaves their voluntary placement in an unplanned way.

However, a key point here is that the parent has parental responsibility and so it is more appropriate for there to be a requirement for the local authority to offer a review rather than a requirement to convene a review. If the local authority has immediate child protection concerns following an unplanned return home then the current legislation and procedures require them to act upon those concerns and provides for action to be taken, if appropriate.

Of course, when a return home is achieved in an unplanned way and without agreement from the local authority, the support and services necessary to make this a successful return are unlikely to be in place. Therefore, the offer of a review may help to clarify what needs to be put in place to promote the child's welfare.

In addition to any review, however, as noted in question 17 above, effective assessment is crucial in this situation to make sure that the right support and safeguards are in place for the child and family. Again, this is best achieved through a commitment to partnership working and engaging the family, and availing of independent advice and advocacy as required. In the case of young adults deciding to return home themselves in an unplanned way this is equally important. We recommend that an assessment of the child's and family's needs should be offered to ensure that the child's needs are met and the child and family's support needs identified; a return home plan could then be offered; please refer to the previous question (17) where we describe what we think this return home plan should cover. This will increase the likelihood of the return home being successful and promoting stability for the child/young person. As with any assessment of identified need this should be reviewed at agreed intervals, with the agreement and involvement of the child and parents.

In relation to children who return home, sometimes in an unplanned way, when an interim care order is discharged or expires, and who currently fall outside the proposals, we recommend that there should be provision for them to be assessed, supported and reviews offered in a similar way to the proposals for voluntarily accommodated children returning home. As parents hold parental responsibility in such situations the basis for any process is voluntary. The emphasis, as above, needs to be on supporting partnership working by promoting the informed participation of parents

19 Do you agree with the proposal to introduce a requirement for a nominated officer to sign off the decision to return a voluntarily accommodated child home? If not, please explain why.

Yes

No

Not Sure

Comments:

A key issue here is that the parent alone has parental responsibility and not the local authority so legally the parent is the decision-maker for the child and signing off by a nominated officer is not necessary.

However, there are likely to be some benefits to a nominated officer (who should be very experienced in this field with extensive knowledge of all the issues involved) having oversight of a planned decision for a voluntarily accommodated child to return home, in particular, if this ensures that a thorough assessment of the child and family's views, and support needs is carried out and a robust return home support plan in place.

We would however, state that the return home plan should address the needs of the child which may not be the same as the "advice, assistance and support that the local authority intends to provide when the child is no longer looked after".

The proposal states that the nominated officer must be satisfied that a number of named people such as IRO, child, foster carer etc have been consulted. However, it does not specifically name parents; instead it refers to "the child's relatives" (where appropriate). This would need to be amended to specify parents.

20 Do you agree that local authorities should visit former looked after children as part of supporting a successful return home from care? If not, please explain why.

Yes

No

Not Sure

Comments:

We agree that visits to former looked after children are likely to be very beneficial and would offer an opportunity to children and their parents to discuss how the return home is progressing and whether they are receiving adequate support and to highlight whether there are any issues which need to be addressed.

However, partnership working continues to be a key factor here as in questions 17 – 19 above, as parents have a choice about whether to agree to such visits or not. Where there are clear agreements in placement about the purpose and frequency of visits and there are clearly stated shared goals, visits are likely to help ensure that the return home can be maintained and be successful.

We would emphasise that support rather than monitoring should be the basis for visits. However, as already noted in question 17 above, if there are specific objectives for parents or sanctions if not met then they must be clearly set out in the return home plan and the reasons explained to parents.

21 Do you agree with proposed eligibility criteria of 13 weeks for visits following return home? If not, please explain why.

Yes

No

Not Sure

Comments:

We do not agree with this eligibility criteria and would recommend that there is no specific timeframe in place. This is because the needs of children and their parents are not likely to be determined solely by the time the child has spent in care. We believe that visits should be based on the assessed and identified needs of children and their families, and with parents' agreement rather than on arbitrary timescales. We would hope that visits would focus on support and preventing reunification breakdown and this cannot be determined by strict eligibility criteria which in effect might deny support to children and families who need it.

22 Do you agree that local authorities should be required to make a minimum of one visit, within a specified timescale, to the child and their family when an accommodated child returns home? If not, please explain why.

Yes

No

Not Sure

Comments:

We strongly agree that the child and their family should be offered a visit and that the local authority should be required to offer a visit. This offer of a visit needs to be subject to parental agreement. As previously stated, supporting a family to access independent advice and advocacy may assist a parent to make an informed decision to accept a visit and to continue to work in partnership with the local authority to help them care for the child safely and to help the child thrive at home.

As emphasised in our previous responses (questions 17 – 20) it is extremely important that there is a robust assessment and shared goals to inform any visits which take place in order to effectively support a child and their family when that child returns home from voluntary accommodation.

23 Do you agree that two weeks is an appropriate timescale within which the first visit should take place?

Yes

No

Not Sure

Comments:

In many case, two weeks may be an appropriate timescale but perhaps not in all as some children and families may have specific needs or issues which may mean that an earlier visit is required. The underlying principle remains that plans including visits should be based on the assessed needs of the individual child or family.

24 Do you agree that local authorities should be required to continue to visit and support the child and their family for a period of at least a year after a voluntarily accommodated ceases to be looked after? If not, please explain why.

Yes

No

Not Sure

Comments:

We agree that the child and family should be offered visits (and the local authority required to make this offer) and provided with support by the local authority as long as the child's assessed needs require this support and services and the parent agrees with this plan. The parent's capacity to care safely for the child should have already been assessed under sections 15 – 20 of the Care Planning, Placement and Case Review Regulations (2010) prior to any planned return home but the visit will assess that the parent is continuing to care safely for the child.

25 Do you agree with the proposed content of the report? If not, please explain why.

Yes

No

Not Sure

Comments:

We agree in the main with the proposed content of the report, however, we query the use of the term visiting officer (representative of the local authority) as we believe that the visit should be carried out by a qualified and registered social worker in recognition that the child and family had specific needs which lead to the child being accommodated in the first place. A qualified social worker should be responsible for visiting so that the local authority can be satisfied that the child's welfare is being promoted.

Should any concerns about the child's welfare be noted during a visit a qualified social worker will be able to follow the normal statutory safeguarding and child protection procedures and clarify what, if any, action needs to be taken with a line manager. Whilst it may be useful that the nominated officer is made aware of any concerns this potentially could leave a child in a situation of risk so should be done in conjunction with, and not instead of, the usual safeguarding and child protection procedures.

The report should also be very clear about what support is being provided and by whom and how that is promoting the child's welfare and supporting the family.

26 Do you foresee any problems with the proposed implementation? If yes, please explain why and what you feel might help to minimise / address the problems.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

The role of family and friends carers is not made explicit in the proposals; they may be approved foster carers or may have obtained a legal order giving them parental responsibility (special guardianship or residence order) following the child being looked after whether voluntarily accommodated or under a care order. Their invisibility in the proposals is problematic and their role should be in the guidance, to be consistent with section 22 (c) of the Children Act 1989.

The perspective, views and needs of parents are critical to children successfully returning home yet are not thoroughly acknowledged in the current proposals. In order for plans for children returning home to be successful, parents need to be treated as equal partners in the process. The proposals which focus on services for looked after or formerly voluntarily accommodated children are valid but do not provide the full context which includes how to effectively work with parents to help them care for their children safely, and how to continue to involve them in plans and decisions for their children when they share parental responsibility with the local authority. The proposals need to be fully consistent with the section 22 (4 and 5) duties upon local authorities to consult with parents when care planning decisions are being made.

27 Please let us have your views on responding to this consultation (e.g. the number and type of questions and whether it was easy to find, understand, complete etc.).

Comments:

The response document does not provide the amount of detail needed in order to respond to the questions; the questions present as quite straightforward however cover very complex issues. In order to answer them thoroughly this requires detailed review of the fuller consultation document. Hence it would be helpful if the specific wording of the proposed changes was highlighted in the response form.

Otherwise, the format is user-friendly.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply.	<input checked="" type="checkbox"/>
E-mail address for acknowledgement: cashley@frg.org.uk	

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, please confirm below if you would be willing to be contacted again from time to time either for research or to send through consultation documents?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed on-line or emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, tel: 0370 000 2288 / email: carole.edge@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed responses should be sent to the address shown below by 29 November 2013

Send by post to: Jamie Roome, Children in Care, 1st Floor, Department for Education, Sanctuary Buildings, Great Smith Street, London SW1P 3BT

Send by e-mail to: ImprovingPermanence.CONULTATION@education.gsi.gov.uk