IN THE SUPREME COURT OF THE UNITED KINGDOM

IN THE MATTER OF HACKNEY V WILLIAMS

(ADOPTION: JURISDICTION)

UKSC 2016/0013

ON APPEAL FROM THE COURT OF APPEAL (CIVIL DIVISION) (ENGLAND)

ON APPEAL FROM THE HIGH COURT OF JUSTICE (FAMILY DIVISION)

B E T W E E N :

John and Adenike Williams

Appellants

-and-

London Borough of Hackney

Respondent

WRITTEN CASE OF FAMILY RIGHTS GROUP

Introduction

1. *Family Rights Group* is grateful for the opportunity to make written and oral submissions in this appeal. *Family Rights Group* is neutral as to the outcome of the appeal and do not intend to repeat any of the submissions already made by the other parties and interveners. The legal representatives for *Family Rights Group* is acting pro bono.

This intervention

2. This intervention addresses the following issues which in our view are central to this appeal:
    a. The relationship between parental consent, the absence of consent/objection and accommodation of a child under section 20 (and not limited to the specific facts of this case – namely, the context of police bail);
    b. The importance of locating the above considerations in the context of both the breadth of the drafting of section 20 itself and the wide range of ways in which it is used;
    c. The role of partnership working with families in the context of section 20 voluntary arrangements as pertinent to the above and more generally to social care practice with families;
    d. The nature and scope of informed decision making by parents/families in the context of section 20 voluntary arrangements;
    e. The relationship between the use of section 20 voluntary arrangements to remove children from the care of their parents and the exploration of alternative family and friends care arrangements for children;
    f. The role and form of scrutiny in respect of section 20 voluntary arrangements;
    g. The role of research and practice guidance (at national level) in addressing concerns about the use of section 20.

3. To work effectively, **section 20** depends on collaboration and partnership. It is located within Part III of the Act which contains the provisions of services for children and their families, and it is important to remember that it does not extinguish or diminish the parental responsibly that a parent holds in respect of their child. This case, however, demonstrates that there is a lack of clarity about:
    a. The purpose of **section 20**;
    b. The limits of local authority power to accommodate children under **section 20**; and

c. The extent of parental rights in respect of **section 20**.

4. This case represents an opportunity to provide clarity, in particular by reaffirming that an effective system of voluntary accommodation depends on:
    a. A relationship between parents and local authorities based on partnership – this is the central concept to an effective voluntary system;
    b. Ensuring there is no coercive element, including 'soft coercion', on parents regardless of the situation a parent may be in;
    c. Parents being able to make informed decisions about whether they should agree to their children being accommodated by the state or indeed whether they object to their child being accommodated.

Family Rights Group

5. *Family Rights Group* was established as a registered charity in 1974 in order to provide advice and support for families whose children are involved with social services. It is the leading charity on kinship care and has had a substantial influence on the formation of child protection law and policy. It works with parents and families whose children are in need, at risk or in the care system and with kinship carers. It campaigns for reform in order to improve the lives of children and families.

6. Over the past 44 years, *Family Rights Group* has supported parents and wider family members to have a voice in policy circles and has had substantial influence on legal and practice reforms in both the child welfare and family justice system. Recent examples of *Family Rights Group's* role and influence includes:
    a. Securing government agreement during the passage of the Welfare Reform Bill 2015 to exempt kinship carers taking on the care of a child from measures to limit child tax credit to two children within a household;
    b. Securing government commitment during the passage of the Children & Social Work Bill 2016, to ensuring that existing statutory guidance is strengthened to make clear the importance of providing appropriate support for young parents who are themselves looked after children or care leavers and who have had a child permanently removed from their care;

c. Influencing Ministers at the Department for Education and Ministry of Justice to agree to change the legal aid eligibility rules so that all parents (with parental responsibility) are entitled to non-means and non-merits tested legal aid where their child is the subject of court proceedings which could result in the child being placed for adoption.

7. *Family Rights Group* also runs a free and confidential advice line, providing advice to over 5,000 families per year involved with children's services or the family justice systems. A significant proportion of the calls received relate to **section 20**.

The Knowledge Inquiry

8. In 2016-17, *Family Rights Group* undertook a wide-ranging inquiry into the operation of **section 20** ('the Knowledge Inquiry'). There were seven main elements to the project:
    a. Discussions and workshops in December 2016 to set the areas of focus for the inquiry;
    b. Online consultation through a series of questionnaires with parents, kinship carers, young people, social workers, lawyers, voluntary organisations, policy makers and academics;
    c. Freedom of Information Act (FOI) requests to all children's services departments in respect of local practice;
    d. A series of individual and focus group discussions;
    e. A one day event bringing together all interested parties to discuss the main points arising from the consultation;
    f. A legal roundtable with solicitors, barristers, judges and academics;
    g. A review of the approach to voluntary accommodation in five other European countries, prepared by Professor Janet Boddy.[1]

9. The Knowledge Inquiry focused on four questions:
    a. What was the original purpose and intention behind **section 20** CA 1989?
    b. Is that original purpose and intention still valid and relevant today?

[1] Centre for Innovation and Research in Childhood and Youth, University of Sussex

c. How is **section 20** presently being used in England (and, in Wales, section 76 of the Social Services and Wellbeing (Wales) Act 2014)?
d. What needs to change and what are the priorities?

10. The Knowledge Inquiry report, **'Cooperation or Coercion? Children coming into the care system under section 20 voluntary arrangements'** was launched on 10 July 2017. The report is attached as appendix 1 to this document. The report makes 23 key findings about the operation of **section 20**[2] and recommendations on how it can used more effectively.[3]

Family Rights Group's **position in this appeal**

11. *Family Rights Group* intends to highlight those aspects of the Knowledge Inquiry and its wider expertise which are relevant to this appeal. In outline, the key points are these:
    a. Families often do not understand their rights or options when **section 20** arrangements are first discussed, put in place, or continued. Most do not know they can say no. Unless these is a letter before proceedings or care proceedings have already been issued, many parents will not have had access to free, independent, legal advice about a section 20 arrangement[4];
    b. Many parents describe coming under significant pressure from social workers to agree to **section 20** arrangements – this is a long way from the partnership originally envisaged by the CA 1989[5];
    c. Statutory guidance currently offers little assistance about the meaning of partnership under **section 20** or its application when working with families. It appears fragmented, with practice across the country variable. There was a general consensus that any renewed guidance should be at national level[6].

[2] '*Cooperation or Coercion? Children coming into the care system under section 20 voluntary arrangements?*' Family Rights Group, 2017, pp60-1

[3] Ibid, pp62-68

[4] Ibid, paragraph 5.6, key finding (2)
[5] Ibid, key finding (3)
[6] Ibid, paragraph 5.6, key finding (10)

d. There is a wide variation in how local authorities use **section 20**: is it short or long term? Should it be used as a pre-cursor[7] to court proceedings or in place of them? Some local authorities require parents to give notice[8] to terminate (if any such notice period is lawful at all)?
e. There is a general state of confusion amongst parents and professionals – hence the criticism of local authorities in a number of the leading authorities;
f. There is limited scrutiny of **section 20** arrangements - the majority operate outside of the court arena (either completely outside, or at the pre-proceedings stage).[9]

How is section 20 used?

12. This case is a clear example of the consequences which the lack of clarity around **section 20** can cause. It is plain that clarity is urgently required so that practitioners, professionals and families have a clearer understanding of the aims and uses of **section 20**.

13. At paragraph 5.2, the Knowledge Inquiry refers to the many ways in which **section 20** is being used currently. It is a broad provision. Recent case law has however focused on the role of **section 20** as a precursor to care proceedings, but where used effectively it is far more than that – there are a wide range of circumstances in which it may be used (which is reflected in its broad drafting). These include[10]:

a. Short term, respite care for children as a way to prevent problems escalating when families are struggling, to deal with a crisis, or where a parent is suffering from a temporary serious illness;
b. 'Short break' respite care for children with disabilities;
c. Longer term care for disabled children – for example for parents who are very much involved in their children's lives, but cannot provide day-to-day care;
d. Children raised in family and friends foster care – whether on a short, medium or longer term basis;

[7] Ibid, p65
[8] Ibid, p59
[9] Ibid, paragraph 5.5.6
[10] '*Cooperation or Coercion?*' Family Rights Group, 2017, paragraph 1.5.3

e. Homeless young people aged 16-17 years old in need of supported or semi-independent living accommodation;
f. To support children returning home from care;
g. To take children into care who are beyond parental control, where the parents maintain a good working relationship with the local authority;
h. To provide accommodation for abandoned children;
i. Unaccompanied asylum seeking children who are separated from their parents or carers.

14. At its best, **section 20** is a flexible provision which represents a crucial partnership between parents and local authorities. A further use of **section 20** is alongside powers to place children in 'foster for adoption' placements. The Knowledge Inquiry found that local authority responses to FOI requests suggested a growing number of very young children in foster for adoption placements with a significant number under section 20 arrangements despite statutory guidance stating that the use of foster for adoption together with section 20 'is likely to be unusual'. Significant differences in attitude and practice among local authorities about use of foster for adoption alongside section 20 were identified.[11] Adoption being the trajectory of a foster for adoption arrangement, there is accordingly very significant implications for a child and family of the arrangement being initiated and these are perhaps all the more acute when foster for adoption is used with section 20. This only serves to underline the need for clarity and guidance in respect of the uses of section 20.

15. **Section 20** is also a widely used provision. Although a minority of children in care are under a voluntary arrangement, most children enter the care system under a voluntary arrangement. Government data available at the time of the publication of the Inquiry highlighted that in England, of the 32,050 children recorded as having entered the care system in the year ending 31 March 2016, most - 61% (19,400) - became looked after under a section 20 voluntary arrangement. Of the children who ceased to be looked after in the care system during that same year (31,710), around half were leaving a section 20 voluntary arrangement.[12] Updated figures since published by the

[11] Ibid, paragraphs 1.5.4; 6.1
[12] Department for Education (2017). Children Looked After in England including adoption: 2015 to 2016, Tables C1 and D1 Available at: https://www.gov.uk/government/statistics/children-looked-after-in-england-including-adoption-2015-to-2016

Department for Education confirm that in the year ending 31 March 2017, of the 32,810 children that became looked after under a section 20 voluntary arrangement, still more than half (53%; 17,540) became looked after under a section 20 voluntary arrangement. Of the 31,250 children who ceased to be looked after in the care system during that same year, nearly half (48%; 14,980) were leaving a section 20 voluntary arrangement.[13]

The nature of section 20: an effective partnership between parents and professionals?

Information sharing and informed consent

16. Deficits in the information that is provided to parents, particularly in the initial stages, was a key theme identified by respondents to the Knowledge Inquiry.[14] There is little prospect of parents making informed decisions without sufficient information, or the time or ability to process that information. Social workers felt[15] that the following factors are vital to get across to families when explaining voluntary arrangements:

    a. The arrangement is genuinely voluntary;
    b. There is genuine understanding of what it is for;
    c. That alternative family carers can be put forward;
    d. The degree of risk.

17. It should also be noted that practitioners responding to the Inquiry's online consultation felt that insufficient information and advice was available to parents about voluntary arrangements and that providing information to parents is in any event not sufficient on its own. Most said there is not enough time for this information to be conveyed to parents or for parents to properly process, understand and make decisions in respect of information provided, particularly in urgent child protection situations.[16]

[13] Department for Education: Children Looked After in England including adoption: 2016 to 2017, (2017). Tables C1 and D1 Available at: https://www.gov.uk/government/statistics/children-looked-after-in-england-including-adoption-2016-to-2017
[14] '*Cooperation or Coercion*?': Family Rights Group, 2017, paragraph 5.5.4, p49
[15] Ibid, paragraph 5.5.4
[16] Ibid

18. The Knowledge Inquiry emphasises the need for ongoing information sharing in addition to initial information sharing and understanding. Families were concerned that relevant information about the child was often not shared with a parent or carer with parental responsibility. Closely linked to this was further concern that cooperation was hindered because of parents/carers being excluded from decision-making about the child.

19. Those parents who may have particular vulnerabilities (e.g. learning difficulties or disabilities) or experience additional challenges (e.g. care leaver young parents) are disproportionately likely to experience social care involvement with their child and may encounter particular difficulties in navigating complex child welfare laws and procedures..

20. These challenges are then compounded by an absence of advocacy support services and the lack of free, independent legal advice available for many parents who enter into **section 20** arrangements.

21. Three key points in respect of information sharing are identified in the Knowledge Inquiry:
    a. The need for an adequate level of information sharing which is in line with the nature of **section 20** being about partnership working[17];
    b. The specific legislative requirements relating to **section 20(7)** arrangements which refer specifically to a person with parental responsibility being able to object. This in turn must be premised on an individual having sufficient information to know (i) that objection is an option and (ii) sufficient information and understanding to enable them to make a decision about whether to object or not;
    c. The wider statutory provisions concerning children in care including provisions about exploring and engaging with or placing children with wider family members – local authorities have a duty to identify wider family members as early as possible and to involve them in decision making.[18] It is

[17] Ibid
[18] Section 22(3) of the Children Act 1989; Department for Education: Statutory guidance on court orders and pre-proceedings for local authorities, April 2014.

crucial that parents entering **section 20** arrangements are aware of this duty so that they can contribute to identifying family members (this point is developed below).

Family and friends placements

22. The Knowledge Inquiry makes clear that there is often insufficient consideration given to kinship care arrangements in the context of removal of a child from parental care under **section 20**. The findings raise concerns that some local authorities actively avoid examining **section 20** family placements.[19] A report of the Local Government Ombudsman issued in 2013 makes the obvious point that it is important that wider family members are identified and involved as early as possible when considering **section 20** arrangements – this does not appear to be routinely taking place.

23. *Family Rights Group* is aware that in many areas it is still not routine for local authorities to offer families a family group conference where a child has become accommodated or may become accommodated. Many children who are raised by family and friends carers have lived in unrelated foster care prior to living with the kinship carer. A response to a Parliamentary Question posed to the Secretary of State for Education by Family Rights Group revealed that as at 31 March 2016 of the 8,140 looked-after children who were cared for in a friends & family foster placement, 39% had been in unrelated foster care before moving to the family and friends placement.

24. Statutory guidance requires local authorities to have published a family and friends care policy. This is intended to ensure that children and young people who live with relatives or friends receive the support that they and their carers need to safeguard and promote their welfare.[20] The guidance further states that the Director of Children's Services should identify a senior manager who holds overall responsibility for the family and friends care policy and ensuring that the policy meets the statutory

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/306282/Statutory_guidance_on_court_orders_and_pre-proceedings.pdf Chapter 2, paragraph 24; '*Cooperation or Coercion*', p51

[19] '*Cooperation or Coercion*', 2017 pp33-34

[20] Family and Friends Care: Statutory Guidance for Local Authorities. Department for Education, 2011.

requirements and is responsive to the identified needs of children and carers. Research has highlighted that such policies often do not identify such a lead person.[21]

'Soft coercion'

25. Many of the parents who participated in the Knowledge Inquiry described facing significant pressure from social workers to enter into or continue **section 20** arrangements. Parents and carers reported[22]:
    a. Feeling threatened with court proceedings if they did not agree to voluntary accommodation;
    b. Feeling they had been threatened that they would lose their children if the case did go to court;
    c. Not being informed that they could object;
    d. Not being informed that they could put forward alternative kinship carers;
    e. Not being kept informed about care plans;
    f. Not being offered any support other than **section 20** accommodation (this has been reported to *Family Rights Group* many times through the telephone advice line – parents describe having asked the local authority for help over a lengthy period and enduring a significant level of resistance).

26. Against this background, the distinction between parental consent and parental objection (which was so central to the Court of Appeal's decision in this case) is unlikely to be so significant for the parents involved. Consent may be embodied in a written agreement – but if that agreement was signed without the benefit of independent legal advice and without understanding its implication, the consent may not in fact be real. A parent has the right to object – but if they are not aware of that right then it is of limited value. The fine distinction between giving consent and the absence of an objection is not a reality for many of the parents involved in the invariably stressful circumstances leading to voluntary accommodation.

[21] Could do better...must do better: A study of family and friends care local authority policies London: Family Rights Group. 2015. http://www.frg.org.uk/images/Kinship_Care_Alliance/could-do-better-must-do-better-report-march-2015.pdf
[22] *Cooperation or Coercion*, 2017 paragraph 5.5.7

27. Many of the social workers who participated in the Knowledge Inquiry were keenly aware of the pressures which parents are under when **section 20** accommodation is raised. Social workers spoke of being under pressure themselves to obtain **section 20** agreements – either to deal with an immediate child protection issue or to avoid going to court, which increases costs and scrutiny. This pressure is then passed onto parents.[23]

28. The Knowledge Inquiry recommends that practitioners be aware of the risks of 'soft coercion' and how this impacts on the parents involved. There also needs to be greater oversight and scrutiny within local authorities of how section 20 arrangements are entered into and continued – again, the approach is fragmented and depends on local practice and procedure.

Scrutiny

29. As set out above, **section 20** is a broad provision which has potentially far-reaching consequences for the parents and children involved. For obvious reasons, **Section 20** arrangements do not attract the same level of scrutiny as care proceedings, even though the outcomes are often similar. Court scrutiny generally comes after the event, once proceedings are issued. Barristers and solicitors who responded to the Knowledge Inquiry reported three main issues about scrutiny:

    a. There is a lack of scrutiny by legal advisors – given the absence of free legal advice in many cases;
    b. There are variable degrees of court scrutiny of pre-existing **section 20** arrangements in cases where care proceedings were subsequently issued;
    c. However, there has been a general increase in scrutiny since the publication of appeal court judgments on **section 20**.[24]

30. Local authority lawyers and social workers referred to local family justice protocols or 'practice directions' designed to scrutinise **section 20** arrangements. Examples included setting timescales within which care proceedings should be issued following

[23] '*Cooperation or Coercion?*', 2017 paragraph 5.5.7
[24] Ibid, paragraph 5.5.6

commencement of a section 20 arrangement. Concerns about the status of such protocols and about unintended consequences were noted. Lawyers, social workers and parents described situations in which children looked after for years under voluntary arrangements (e.g. those living in residential care meeting specialist needs) found their case suddenly before the court, rupturing a history of collaborative work in the child's interests and trust between parents and local authorities.[25]

The approach in other jurisdictions

31. As part of the Knowledge Inquiry at page 19 Professor Janet Boddy carried out a scoping review examining the approach to voluntary accommodation in five other jurisdictions: France, the Netherlands, Denmark, Norway and Finland. The key points to note are:

    a. As in England, the majority of children in the care system in France and Norway were in care as a result of 'court/judicial measures';
    b. The majority of children in the Netherlands and the three Nordic countries were in care through voluntary agreements entered into with parents or with older children;
    c. Professor Boddy found references to 'soft coercion' in each of the jurisdictions she reviewed, particularly in relation to the threat of court being used as a means to secure agreement;
    d. There is more of a policy emphasis on partnership with parents in the five other jurisdictions;
    e. **Section 20** arrangements in Denmark and the Netherlands are also seen as part of the intervention with the whole family – not just a child-centred intervention.

32. Professor Boddy's research in respect of other jurisdictions indicates the importance of partnership working for all voluntary care arrangements. Her research indicates that 'soft coercion' in the context of voluntary care arrangements is a cross-jurisdictional

[25] Ibid

challenge and therefore is a more far-reaching issue than the individual cases which have been before the court.

Guidance on section 20

33. The appellants have referred to the original statutory guidance that accompanied the CA 1989. Those points will not be repeated here, save to underline that the statutory guidance did refer to the need for cooperation, negotiation and agreement when considering voluntary arrangements.

34. This emphasis remained in place at the time that the Williams children were accommodated. Social work practice was guided at that time by **Working Together 2006**.[26] This set the standard of good social work practice for communicating with parents and under the heading Communication and Information, the guidance stated:

> *"The local authority has a responsibility to make sure children and adults have all the information they require to help them understand the processes that will be followed when there are concerns about a child's welfare. Information should be clear and accessible and available in the family's preferred language[27]."*

35. However, it is important to note that the above guidance falls within the 'non-statutory' section of **Working Together 2006**. This indicates a general watering down of the importance of information sharing and partnership working through the different iterations of **Working Together**.

36. There is also a lack of clarity about whether the original CA 1989 statutory guidance on **section 20** remains in force. There is no reference in **Working Together 2006** to the original statutory guidance relevant to section 20 having been replaced or repealed (nor, for completeness, does there appear to be any reference to it being replaced or repealed in *Working Together 1999*, which includes within its appended reading list, the original CA 1989 statutory guidance).

[26] Working together to safeguard children: Department of Education, 2006

[27] Ibid, paragraph 10.7, p190

37. However, as many of the professional participants during the review exercises carried out in the Knowledge Inquiry reported, there is relatively little reference in current guidance regarding how local authorities and individual social workers should approach working with parents under section 20. For example, **Working Together 2015**[28] mentions section 20 only to confirm that a 'child-centred approach' applies to children accommodated under that provision and to restate the relevant statutory provisions. There is not a single reference in the document to partnership working with families and nor is this addressed in the draft version of **Working Together 2018** [see **Appendix 2** for the *Family Rights Group's* response to the draft **Working Together Consultation 2018**].

38. The voluntary sector has taken steps to fill the gap. The Transparency Project[29] and the Council for Disabled Children[30] have both published guidance on the use of section 20. While these are helpful guides, they are of course not underpinned by the force of law and not a substitute for focussed, national guidance.

The need for further research

39. The Knowledge Inquiry reiterates that **section 20** remains a complex yet under researched area. It noted:

"*there is an absence of recent research focused upon section 20 voluntary arrangements; it is an under researched area cross-nationally. Within the child welfare system in England and Wales this is a significant gap and a barrier to research informed practice*[31] *in this area*[32]".

[28]Working together to safeguard children: Department of Education, 2015

[29] 'Section 20 Guidance Note' Transparency Project, (updated 2017)

[30] Broach S '*Short Breaks for Disabled Children*', Council for Disabled Children, 2017

[31] '*Cooperation or Coercion?*', 2017, pp 63 – 64 see section entitled '*Addressing gaps in statutory guidance and barriers to research informed practice*'

[32] Ibid, p60

40. It was also found that local authorities are not consistently collecting, collating and sharing more detailed information about their **section 20** looked after populations[33]. Many local authorities appear not to have processes through which they can collect and collate detailed and relevant information about how voluntary arrangements are used within their authority.

41. There is an urgent need to address the dearth of research by commissioning further research. The Government should consult about the scope of such research including children and families and their views[34]. A suggested approach is for the Government to set out the principles for partnership working with families and children, in an updated version of Working Together. This should be drawn up in consultation with children, families, practitioners and voluntary organisations. It should consider how partnership working should encompass not only how the authority works with families and young people in relation to their specific individual circumstances but how the authority can draw upon children and families' knowledge and expertise to inform service design, policies and provision[35].

Conclusion

42. Drawing the strands together, **section 20** can be an effective provision, if used and understood properly. The judgment of the Court of Appeal necessarily had a narrow focus, given the specific facts of the case it was presented with. However, this appeal represents an opportunity to reaffirm the importance of **section 20** as to the support and partnership which local authorities can offer to families. As evidenced by the recent authorities and the Knowledge Inquiry, there was a lack of clarity as to the correct approach of local authorities when exercising their obligations under **section 20**.

43. Clarity is required to ensure that the broad scope of **section 20** is understood and consistently put into practice. National protocols/guidance are required which can be applied by practitioners and lawyers and understood by families.

[33] Ibid, key finding (8), p60

[34] Ibid, p63

[35] Ibid

The need for guidance

44. The *Family Rights Group* has prepared a response to the draft **Working Together to Safeguard Children Consultation 2018** [**appendix 2**]. The response notes that the proposed new draft of **Working Together** currently provides little assistance or guidance to practitioners and local authorities about partnership working with families. In particular, the issue of partnership working was not addressed in relation to section 20 voluntary arrangements at all.

45. The response concludes that **Working Together** has a role to play in providing practitioners with appropriate guidance for effective partnership working with families and therefore any revision of this should explicitly set out the principles for partnership working with families from the earliest stage.[36]

46. The need for research and consolidated guidance on the use of section 20 has formed part of the recent roundtable discussions which have been taking place as part of the 'Care Crisis Review', which *Family Rights Group* are currently undertaking. The discussions have involved judges and practitioners in addition to local authorities. It is plain that there is a difference of opinion as to when section 20 should be used. Following the decision of **Re N (Children) (Adoption: Jurisdiction) [2015] EWCA Civ 1112** there has been further discussion amongst practitioners and lawyers as to the appropriate use of section 20 and this has not yet been resolved.

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[36] Family Rights Group response to Working Together to Safeguard Children 2018 Consultation, paragraph 4.4

Appendices

1. Cooperation or Coercion? Children coming into the care system under section 20 voluntary arrangements? Family Rights Group, 2017

2. Family Rights Group Response to Working Together to Safeguard Children 2018 Consultation