



**National IRO Managers Partnership**

# Stable Homes Built on Love – Consultation Response from NIROMP

## Introduction

The National IRO Managers Partnership (NIROMP) is the national leadership group representing Independent Reviewing Officers (IROs) and IRO Managers. NIROMP welcomes the opportunity to respond to the themes and questions set out in the Stable Homes Built on Love consultation. We would welcome further opportunities to discuss our response.

NIROMP members are ambitious for children, young people, and families. We have engaged throughout the Independent Review of Children's Social Care; from launch in early 2021 through to the publication of its final report in 2022 and DfE's proposed implementation plan in early 2023. We are committed to working with the Department for Education, and others, to realise positive change.

We hope the reforms set out in the implementation plan, the Six Pillars of Action will allow for the strengthening of public services as this will be key to improving outcomes for the most vulnerable children and families we serve. The substance of our response attends to the 'Six Pillars of Action' set out in the implementation plan.

NIROMP members believe that transformation of the system for children and families depends on transformational public, social and economic investment in them. We continue to support the important ambitions described for children and families, and the loving care they so rightly deserve. However, it is hard to see in the implementation plan any of the urgency or scale of reform and investment required from government for stated ambitions to be realised.

## Family Help provides the right support at the right time so that children can thrive with their families

The strengthening of early help and family support would be welcomed, but the proposals lack detail or clarity as to how the aims will be achieved.

Whilst the social care implementation plan makes repeated reference to the local, universal services that families all rely on at some point, and with which new Family Help programmes

must be linked, it does not address the strain these services are under, with workforces such as health visitors and school nurses significantly depleted. To realise truly effective multi-agency, multidisciplinary family help when each agency has their own competing priorities, policies, legislative and regulatory frameworks, guidance, and financial constraints will require more joined-up government. The full buy in and support of all relevant government departments and agencies is needed.

Funding settlements need to address the existing regional inequalities our members see. We are concerned that much of the additional funding committed in the strategy will go to pathfinder and pilot areas. There needs to be an equitable funding settlement for all, to address the significant cuts to early help services, to enable early help services to be rebuilt, to break the cycle of crisis.

We are concerned that the level of funding to support the reform programme is insufficient and will not sustain change beyond the initial two years of reform. Any reform will require long term, equitable and sustainable resourcing. Our members are seeing increasingly more children and families in acute distress and crisis, and we see across our regions a public service system that is also experiencing crisis. Policy choices aligned to a focus on austerity have resulted over more than a decade in central government funding that is out of step with reality.

There needs to be clarity about how the desired outcomes can be measured and delivered within the context of the already considerable challenges facing children, young people, and families as well as the public services that serve them. For example, clearer articulation of the role of partner agencies and trusts is needed. To assist this, we would want to see the strategy underpinned by more joined-up, cross-government departmental policy, to better leverage a coherent governance framework that underpins multi-agency arrangements and as anchored in legislation. Anchoring family help plans in the duty to cooperate as set out in Section 10 of Children Act 2004 as well as Section 17 of the Children Act 1989 might help.

## A decisive multi-agency child protection system

NIROMP supports the principles related to better working together and partner agency working. The co-location and different configurations of child protection services and family help is an area that requires more exploration and a flexible approach to account for local and regional differences. A clearer articulation of the role and expectations of partners is needed. Governance and the ability to lever resources and behaviour change from statutory partners will be crucial, this is also an area that needs to be further developed and tested and NIROMP would welcome input to this. NIROMP's existing communities of practice and regional groups could be a good vehicle from which to work collaboratively with the Department for Education, and others, to share learning, different ways of working and key messages.

## Unlocking the potential of family networks

Whilst there was some welcome focus on racial inequalities and deprivation in the implementation strategy, more attention and measurable action is needed to address systemic and structural racism, intersectionality, and disadvantage.

We return to the need for a joined-up government approach to need, to act on the root causes of poverty, injustice, inequity, and inequality. Children and families are increasingly entering children's services at crisis due to problems with welfare, housing, and a hostile immigration system. The Section 17 resources so needed to tackle earlier help are being used to meet basic survival needs: food, shelter, beds, heating, clothing. Increasing numbers of families are at risk of destitution, including a growing number with no recourse to public funds due to delayed decision making about their immigration status. Problems with housing, including the quality and escalating costs, are increasingly issues impacting on family functioning and contributing to poor mental health, family stress, parental conflict, domestic abuse, school problems, ill health, and family breakdown.

Our members want the government to provide sufficient funding to tackle, head on, the challenges the sector is facing as a whole and to move away from short-term term funding to a more equitable, sustainable funding settlement. The independent review of children's social care identified the need for £2.6 billion of investment to achieve reform. The strategy commits £200 million in additional funding to support children's social care. Analysis by the Local Government Association (LGA), prior to the cost-of-living crisis, indicates an existing shortfall of £1.6 billion per year simply to maintain current service levels, to improve the system to better meet the needs of children and families. Despite increasing their budgets by £708 million in 2020/21, councils overspent their budgets by £800 million, indicating the considerable scale of the challenges.

## A valued, supported and highly skilled social worker for every child who needs one

The creation of a child protection lead practitioner role as one of the reform proposals to improve child protection social work risks inadvertently creating a two-tier children and family social work workforce. We are also concerned that the five plus years of experience needed, as early plans for the Early Careers Framework indicate, are not realistic in the current or the short to medium term environment. The use of child protection lead practitioners should be locally determined, based on a range of local factors, including workforce profile.

## Putting love, relationships and a stable home at the heart of being a child in care

A strategy for kinship carers that recognises their importance and need for more help is very welcome.

We hope children's transition to adulthood will no longer be an abrupt withdrawal of support for children in care, however we do not see the real commitment required to keep caring until 18 and beyond. The government's commitment to strengthen Staying Put and make Staying Close a national entitlement, as well as increasing care leavers' allowances and exploring new mental health support requires investment in public services and communities. We return to the need for a joined-up government approach to policy and financial investment to tackle welfare issues linked to poverty, poor housing, etc. This recognition of young people's ongoing need for support networks is at odds with the government's continued commitment to creating standards for 'supported accommodation' that preclude care itself.

## Strengthen and extend corporate parenting responsibilities towards children in care and care leavers across the public sector

We agree that corporate parenting duties should be extended beyond local authorities and that a range of organisations and businesses can and should play a more active and meaningful role in improving outcomes for children in care and care leavers.

It is disappointing that the recommendation to make care experience a protected characteristic was not taken forward in the DfE's implementation planning. Making care experience a protected characteristic could have gone much further to improve outcomes up to 25 years old and beyond.

May 11<sup>th</sup> 2023

## **Appendix 1: The following response has been provided by NIROMP's North West Regional Network**

Broadly amongst IRO Managers the principles are supported, although there is some concern and disquiet about how the activity within these principles will be progressed – much of the information for the consultation was based on development through the Pathfinders - but much of the issues are not new and the potential solutions do not always seem to be clear

- Concern firstly that the questions in the consultation do not ask for wider response on alternative possibilities, but a response to some specific questions
- Overall we felt that the principles and the aims were right as contained in the 6 pillars and what is wanted and intended to be achieved
- However generally there seemed to be a lack of clarity as to how the aims would be achieved – and much of it was statements about what we think the system should look like (and probably not too different from what we have wanted prior to the review?) but limited substance and finance as to how these would be achieved
- The financial implications were just not clear, what the costings would be and were what is proposed realistic to enable the desired change for children, families and care experienced people
- The underlying factor not stated was that to achieve the change there would need to be a culture change in how the system is viewed, what the system does and how it does it. A stronger position on how the culture change will take place and what this will look like is required.
- It is also unclear how any culture change would be supported and sustained
- Strengthening of early help and family support would be welcomed
- Most of the actions for child protection including working together and partner agency working are ongoing issues, and the consultation did not really offer any significant suggestions as to resolving these issues or nothing new.
- Really supportive of the development of parental advocates for children in child protection and supportive of the offer of advocacy for all children in care – again more information is required about how this would happen, including role out and the recruiting of advocates nationally and managed, would this be regional, local or national
- Challenges for how the specialist Child Protection social workers would work and integrate into practice (as well as the effective recruiting to this role and management of the role, where the sector is already challenged with recruitment issues)
- Broadly supportive of aims of "Family First" and development of kinship care – as well as seeking more clarity and definition
- We could not work out in the family/kinship pillar how "lifelong legal guardians" would work or be incorporated into the legal frameworks for both children and adults

- Broadly supportive of the aims around care experience
- Some concern that the proposals for recruitment and retention of foster carers is much repeated statements and nothing new
- Concern about what is meant by “excessive” profits for care providers – and when is profit excessive , but this needs to be more stronger in saying care providers should not be concerned as to profit and should be non-profit making bodies
- Remaining concerns about how the regulation of supported accommodation will work
- The issues of regional and other means of securing placements is only as good as the availability and sufficiency of placements
- So little is said about sufficiency and commissioning which are the underlying issues for care accommodation provision
- Not much to be said about workforce and service delivery – principles are suitable – but remaining question how do we identify and retain staff – there was limited information about this, except for the support for those in early social work career. This framework for the first 5 years of social work career is welcomed.

May 10<sup>th</sup> 2023