

3. Commissioning.

The research confirms that current commissioning arrangements are ineffective and it makes some recommendations on improving this. Whilst I wholeheartedly agree that commissioning needs to be improved, I do not think the report is clear enough on explaining the challenge that exists between (a) providing as wide as possible access to placement choice and (b) enabling efficiencies by guaranteeing a foster care provider (whether in house or external) a certain level of business.

Whilst we do need to do more to ensure commissioning is more efficient and effective, we can not allow this to happen in such a way that it risks children not being placed with carers who may best meet their needs and enable stability. Ultimately it is this that provides the best long term value for money for the public purse.

The need for improved and trusting relationships between local authorities and independent providers is a critical point and I really welcome the message that providers need to be involved in the planning and development of commissioning strategies. In my opinion there is much experience, skill and knowledge in the independent sector that is not being utilised.

4. Comparable costs

It was refreshing to hear that robust analysis on comparable costing had been done and that the gap between local authority care and independent provision is actually much smaller than is commonly suggested. This will be a critical point for commissioners to acknowledge when reviewing and developing their commissioning strategies (which have largely been driven by a misconception that local authority services are significantly cheaper).

Where the report refers to the fees charged by independent providers, I found it frustrating that the report did not recognise that fees vary across regional frameworks due to the fact that specifications are different and that there are different contract terms presenting different levels of risk to providers.

In this section the report refers to the in-house first policy and I disagree strongly with the view that it is acceptable to search in house first. As Clive Sellick identified in his 2013 report 'Foster Care commissioning in an age of Austerity', children are sometimes being 'shoehorned' into local authority placements and this is made possible by the nature of 'in house first' policies.

I believe that local authorities need to better distinguish between the two very different acts of 'looking in-house first' and 'placing in-house first'.

We cannot condone blanket 'in-house first' policies. That is too simplistic and we owe children more than that. Every child is different, and every time a search is required, there will be differing factors to take into consideration. I strongly feel that any placement finding strategy should be determined on an individual basis, guided by the individual child's needs, the knowledge of provision and most importantly the time available. In very few cases it may be acceptable to initially restrict searches to in-house services. But in the majority of cases we need to cast the net more widely to identify the best match for the child.

If, after searching in both internal and external services, the child's social worker agrees that either a placement in the local authority services or a placement in an independent fostering service are equally able to meet a child's needs (and provide the same chances of providing stability and delivering the required outcomes), then by all means an 'in-house priority' policy is acceptable. But only after options have been considered.

We cannot continue to have a system that prohibits the child's social worker from even knowing about all possible matching options for a child. That is neither right for the child or in the best interests of the public purse. The best match will deliver the best outcomes and stability and that itself will deliver value for money.

I support the recommendation of a national vacancy management system and know that with the right technology, referrals can be targeted to selected providers, using criterion that match the child's needs and in accordance with statutory guidance and regulations. This, along with much improved referral information will reduce the resources currently being used to wade through inappropriate referrals.

5. Matching

I was pleased to see the recognition that both carers and children need more input into this process. I feel the report should have drawn attention to the fact that referral documents are not acknowledged anywhere in legislation despite being one of the most important documents influencing a child's life. It also did not identify that these documents are too often completed by social workers that do not know the child well enough, and sometimes even by placement officers or administrative assistants who may have never met the child.

I would have liked to have seen a strong recommendation that, where children move from one placement to another, the referral documentation is completed and/ or reviewed by the foster carer (or children's home manager) before it is sent out to search for a placement.

6. Independent Reviewing Officers.

My own experience of this role is varied. I believe practice varies significantly across the sector and that there is inadequate practice, but also many examples of where an IRO has been the driver for ensuring the best for a child.

I would have liked to see the acknowledgement that there is a conflicting definition of placement plans and care plans in legislation and this is causing confusion (across both fostering and children's homes). That there is a real need to have this reviewed and clarity provided. I would have also liked to have seen recognition of the void between independent reviewing officers and local authority commissioning teams. Both review and monitor the placement, yet there is a lack of good practice examples of local authorities having good internal arrangements for sharing information to enable efficiencies.

Whilst I am currently undecided about the complete removal of independent reviewing officers, I do believe strongly that there is a role for more independent oversight of the placement sourcing and matching decisions and for scrutinising the planning of transitions.

7. A National Register

I agree with the proposal to have a national register. I think this would enable better recruitment, inform commissioning and could aid matching as well as create efficiencies through reducing administration. However, the links (both the risks and benefits) between such a register and current commissioning arrangements needs to be considered. If such a register is commissioned, then it will need to consider the impact on framework contracts and dynamic purchasing systems which may have existing matching arrangements in place. It will be important to consider if, or how far, the introduction of a national register may create additional work for local authorities and providers and it will need to look at how this can be minimised.

Marie Tucker

<https://twitter.com/CICADAServices>

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