

Consultation

Fostering for the future: improving the foster care system, call for evidence

17 March 2026

Issue 1: Financial Transparency

9 To what extent do you support the idea of increased financial transparency?

Strongly support

10 In your view, what (if any) are the potential benefits of increased financial transparency?

Please respond below:

CoramBAAF agrees that there should be increased financial transparency. It will be important that the increased transparency covers all fostering agencies; local authorities and independent fostering providers. Increased transparency will make it clearer to prospective foster carers the financial support available from a service. This may help reduce movement of foster carers between agencies which can be disruptive to children, because they will have been able to consider the full support package available when considering options.

Increased transparency will showcase the different models and approaches to financial support across agencies and carers will be able to understand and align their own views and needs accordingly

“Any meaningful reform must start with an honest acknowledgement: foster carers are part of the children’s workforce. If we are serious about modernising fostering, reform must include: Improved financial recognition that reflects the skill, responsibility and intensity of the role — not allowances that fluctuate or fail to match inflation.” (feedback from a CoramBAAF member)

“Foster carers face ongoing structural barriers that must be addressed if reform is to be meaningful. Carers often experience a lack of professional credibility” (feedback from a CoramBAAF member)

It is essential for foster carers being able to make a decision. Whilst becoming a foster carer should not be a purely financially motivated decision it is absolutely vital that prospective carers can understand the package of support that is available to them and their families from an agency. Being a foster carer



affects all aspects of someone's life and therefore it is only right that people make informed decisions. Knowing the package of support available in advance enables prospective carers to consider their own support needs during assessment and approval and to make a choice about the best agency for them

Kinship perspective

Kinship zones pilot will inform policy development around financial allowances for kinship carers. In the meantime, CoramBAAF agrees with increased financial transparency for kinship foster carers, in particular regarding the professional fee structure and evidence required to be eligible as a kinship foster carer.

11 In your view, what (if any) are the potential challenges of increased financial transparency?

Please respond below:

As stated above we welcome the principle of increased transparency but we are conscious that most local authorities publish basic information about allowances and fees anyway. As independent fostering providers don't ordinarily publish their fee and/or allowance structure, some may be reluctant to do so and may opt out if there is an element of choice.

In order for measures in relation to financial transparency to be effective this will require regular updating so that financial transparency is up to date for prospective foster carers. This is an administrative task. This could form part of Ofsted inspections.

With the move to regionalised foster hubs there may be additional complications linked to financial transparency. For example, if different LAs within a region have a different support offer (as they do currently) carers may be assessed and approved by a regional social worker in a hub and then be potentially supported by a local authority supervising social worker within a local authority. Without careful thought and planning this may lead to more carers moving LAs within a region and confusion about support. There is an opportunity to standardise (harmonise) financial allowances and support within a region, but we know this is complex and also varies depending on local availability of services. Local authorities who have different financial constraints due to budget pressures will have different offers.

Kinship perspective

Payment of financial allowances for kinship carers is a significant policy tension. Increased financial transparency may unintentionally increase the number of kinship carers wishing to continue as kinship foster carers while we await evaluation of kinship zones pilot. This may unintentionally contribute to heightened dissatisfaction and division if kinship carers outside of kinship zones still struggle financially with inadequate financial support.

12 In your view, how important is it for foster carers to know the full financial offer, including incentives (e.g. discounted council tax or free parking in local authority car parks), of different fostering services before making an enquiry?

Very important



13 What information on fees, allowances and expenses does your fostering service already publish? Please select all that apply.

Not applicable

14 In your view, how important is it for foster carers to understand the different components of the pay they receive? For example, understanding which component is the allowance, which component is the fee or other expenses.

Very important

Issue 2: Introducing a national foster care register

15 To what extent do you agree or disagree with introducing a national foster care register?

Strongly agree

16 What (if any) would be the potential benefits of a national foster care register?

Please respond below:

In principle, a national foster care register would most likely be helpful in our view. A register could help with matching, could help with transfers and could help with identifying foster carers who have had standards of care concerns. Overall, we are of the view that benefits of having a register outweigh the potential concerns.

There are numerous potential benefits of a national register which would bolster safeguarding mechanisms, for example if a foster carer's approval has been terminated this would be visible on the register and this would enable fostering services to check a new applicant/ transferring applicant for this information. This will require stringent operating protocols for how information is stored, shared, updated and utilised.

It would be vital to know what the register would be setting out to achieve and what would likely be recorded on it. Many foster carers we spoke to as part of this consultation welcomed the idea of a register but had concerns that the purpose and remit of the register might expand over time as well as the amount of significant individual and personal data. Foster carers would like more information about how information on the register would be used in practice.

Functions of a register that we consider important:

- Details of what will be recorded on the register e.g. – name, registration number, date of approval and current approval status (number, age range and type of fostering)
- Protected characteristics – depends on purpose and usage
- Training – completed and outstanding. This requires the register being updated with this information which creates an additional administrative task for fostering services.



- Allegation investigation when this is substantiated – date and brief detail
- Termination of approval – date and reason
- Vacancies and occupancy – if the register has this live functionality, then the register will support matching and this could make a significant difference to the lives of children. By being able to see where foster carers live, what their approval status is and whether they have capacity (occupancy) then a child can be matched with proximity to their home/school/ siblings. However, this will only work if all LAs and IFAs are inputting live information into the register. This would require statute or regulation to impose a requirement to enter information as with adoption. Partial/delayed or optional compliance would defeat the purpose.
- Portability and transferring foster carers could be improved if regulations were changed to enable this. Currently to move agency foster carers are required to resign from one FSP before approval by another. A register has the potential to make this process more streamlined in conjunction with appropriate regulatory change. Currently children tend to be placed in the first instance with foster carers approved by the child’s local authority, then seeking an IFA foster carer if availability doesn’t exist. With a register and agreed working principles an LA could contact a neighbouring LA where a foster family live close to the child’s local home area and they could be matched. This could be a benefit of regionalisation. Fostering services should be able to check the register which will help with checks for new and transferring applicants.

The suggested idea of regional registers instead of a national register would not work in our view. Each region could develop their own framework which would build in discrepancies and foster carers could end up with very different experiences which is the opposite of what foster carers and fostering services have been requesting for many years.

“National Register broadly a good idea and positive benefit for both carers and service managers. 1. Potentially promotes status and professionalism. 2. for managers allows opportunity to match in an emergency locally where needed - and possibly across local authority borders. 3. Promotes portability and transfer between LA areas (or IFAs) - but caveat - with care - it needs a managed approach 4. Potentially promotes chance for a role of 'accredited foster carers.” (feedback from CoramBAAF member)

Kinship perspective

Decision would need to be made about whether kinship foster carers should be included in the register or only if they are wishing for their approval to be changed beyond approval for a specific child/ren. Decision would need to be informed by agreed purpose of register and therefore whether relevant to kinship foster carers.

17 What (if any) would be the potential challenges of a national foster care register?

Please respond below:

The welfare of children should be the primary concern. It is important the register is for the purpose of improving children’s lives as opposed to prioritising the concerns of adults/professionals needs.

Key questions that we have are:



- Who will administer/ pay for it?
- Will it be a statutory duty, if not then the benefits could become redundant?
- Will it be kept up to date. Only valuable if instantaneous. Who will be responsible for ensuring it is kept up to date. If information is not up to date, what are the consequences. There is a risk of creating additional administrative burden. .
- Will it be only administrative or require human input as with the adoption register?
- If introduced, will it be evaluated and monitored and who would have oversight of it?

18 What features do you think would be most important to include on a national foster carer register for it to be effective?

Please respond below:

The fostering register should include the following information about carers to be effective:

- Approval status and date of approval (no of children and age range approved for)
- Number of children matched (if live system) Agency Substantiated allegations
- Approval terminated
- Training completed
- Age range of previously fostered
- Date of last annual review
- Real-time updating of approvals, vacancies and availability.
- Clear indication of geographical location and radius for placement searching, because operational usefulness depends heavily on local placement needs.
- Information on the type of approval, terms of approval, household capacity and whether carers are currently available for matching.

A record of previous fostering approvals or applications, to reduce reliance on self-declaration and make transfers more efficient. The call for evidence notes that services do not routinely know whether applicants have previously fostered or applied elsewhere and that carers can be required to start again after moving.

Clear governance, access controls and audit trails so only appropriate professionals can access or amend data. Interoperability with existing local authority and IFA systems

19 Please explain why you think these features are most important. In your response, please ensure that you are clear which feature(s) you are referring to.



Please respond below:

Real-time updating would be essential. The register needs to be current to be useful and not create false confidence and poor matching decisions. This is a concern raised consistently by practitioners.

Location and search-radius functions are crucial because decisions about matching are heavily shaped by the duty, where reasonably practicable, to place children near home. The existing local placement duty under section 22C(8) Children Act 1989 makes this point especially important. Practitioners have said tools such as a register must be able to identify suitable carers within a workable local distance on the day they are needed for the register to be of value.

Information on approval terms and availability matters because the register would otherwise be a list without enough operational detail to support matching.

Data governance and access controls are critical because the information is highly sensitive. Without robust controls, a national register could create significant confidentiality and data protection risk.

Interoperability matters because otherwise the register will create duplication, delay and inaccuracy if this is not possible. The workshop concern was not just whether a register sounds attractive in principle, but whether it can actually function in practice without becoming another burdensome administrative layer. Careful thought needs to go in to the purpose of the register and the likely administrative implications on agency staff.

Issue 3: Amending the fostering limit

20 What challenges do foster carers report when caring for more than three children in care, including sibling groups?

Higher risk of placement disruption, Limited respite opportunities, Managing challenging sibling dynamics, Workload pressure, Lack of training & support Other:

21 What key criteria should inform decisions about the number of children cared for by a foster carer?

Suitability of the living space/environment, Emotional and physical needs of the individual children, The relationship between the children, Child-specific factors such as age, gender and cultural identity, The skills and experience of the carer

Other:

22 What safeguarding arrangements would be most important to implement if the standard limit were to be removed?

Other: please explain 'other'.

We don't agree that these should be removed.

23 Which of the following approaches do you prefer:



Retain the statutory three-child limit

If desired, explain your response below:

Retain the statutory three-child limit – with exemptions as current. Need to be a senior level decision with accountability

There is potential for exemptions to be more nuanced to allow an appropriate level of additional short-term temporary placements to cover respite and support network arrangements for specific matched children

There appears to be some misunderstanding and confusion across the sector about the need both to vary the terms of approval to cover the number of children who can be cared for and to obtain an exemption from the usual fostering limit. There may be scope to combine the processes for the variation and the exemption, especially where the carer has not been approved by the local authority in which they live, so needing decisions from two authorities/agencies, as well as clearer guidance on when and how exemptions and variations are needed.

The limit for how many children could be fostered per household was introduced to increase the safety of children and with an acknowledgment that children who've experienced trauma and loss require emotionally available foster carers. In practice terms this proposal, if taken forwards, this would be a backwards move in relation to safeguarding children in care. For the few applicants/ foster carers who are motivated by finance this would be an appealing prospect and we have concerns about this.

It should be noted that the usual fostering limit also applies to private foster carers. One of the concerns and reasons for introducing the limit was to prevent the operation of commercial operations which were in reality children's homes under the guise of private fostering arrangements.

The usual fostering limit applies to foster carers. If they exceed the usual fostering limit the consequence is not that children cannot be placed, but that the carer will be required to register as a children's home, with the additional safeguarding, staffing, physical safety of premises etc requirements.

The government should consider requirements in other settings for limits on number of children cared for per adult, e.g. child minding/day care/nursery. It is illogical to mandate limits in a professional limited hour setting but then to allow those limits to be exceeded in a 24/7 family environment such as foster care.

The suggestion to amend the limit is at odds with therapeutic and trauma-informed parenting/care. Foster carers frequently face burnout and compassion fatigue. The pressure faced by foster carers already is significant. A proposal that increases this risk for foster carers will lead to children having to move and foster carers leaving fostering.

By caring for more children the following issues and disadvantages are more likely:

- Increase in administrative tasks (logs etc) which equates to less time available to spend with the child.



- Higher likelihood of allegations and standards of care which will directly impact retention rates and the need for children to have to move homes.
- Children will spend more time in the car/ bus journeys travelling to spending time with family arrangements for other children, this is applicable for school/ nursery runs, health appointments, clubs and activities
- An increase to the number of social workers, health professionals, IROs, guardians and others visiting the home will be disruptive and also has the potential to destabilise children whilst also impacting their own experience of foster family life even further.
- Children will be matched alongside one another where there are potential risks because time will not permit for full and robust matching alongside discussions to take place
- Will there be changes to rules around bedroom sharing and if so this will require additional risk assessments. The potential of overcrowding would need to be considered carefully.
- Due to sufficiency Supervising social workers and placement officers will be expected to match greater numbers of children with foster carers, this pressure is felt acutely by social workers and will be passed on to the foster carers. Foster carers already report that support is not adequate and that they are not listened to e.g. not being invited to all meetings about the child in their care. This power imbalance and associated frustrations will increase and could create challenging dynamics.

“Had I lived in a house with many children I am unequivocally certain that my needs would not have been met” (feedback from Care experienced consultant)

We have concerns about the idea of discipline practices as set out in the consultation? Discipline practice is an outdated terminology and we have concerns about its use in this consultation.

Managing privacy: We are not sure what this means in relation to the consultation, but when misapplied can lead to prejudice against foster carers, and is not supportive of meaningful relationships e.g. carers being discouraged from bathing children/ involvement in any bedtime routine based on no other rationale other than aspects of their identity.

24 To what extent do you agree that amending the standard limit would allow foster carers to support each other with respite? If desired, please explain your response in the text box.

Strongly disagree

If desired, explain your response below:

Issue 4: DBS checks and vetting for prospective carers

25 To what extent do you agree that the current arrangements on the filtering of DBS checks is appropriate for foster care, kinship care and adoption?



Neither agree nor disagree

If desired, explain your response below:

Guidance is open to interpretation and therefore understood and applied differently between LAs and regions. Inconsistencies and variation in practice across adoption, fostering and kinship include:

- Both the 'update service' and one-off application (which can be paper or digital) are in use.
- Variations in age when DBS required - over 18 years or over 16 years for household members.
- Inconsistency in whether DBS is required for other young people in care living in household in staying put arrangement and challenges of young person having ID required
- Definition and policies on 'significant others' is open to interpretation and lacks clear guidance - who is defined as a significant other, what level of involvement in childcare meets threshold for a DBS, and quantity/limit on number of additional DBS checks required
- Lack of clarity on whether partner not living in household requires DBS
- Enhanced DBS only available for household members, therefore a significant other who lives elsewhere but may have significant caring responsibilities can only access a basic or standard DBS check
- Variation in frequency of updates required - every 12 months or every 2 years
- Variation in how information disclosed via the DBS check is used within assessment process and risk assessment
- Inconsistency in how risk assessments are undertaken and level of management oversight required when history of offences
- Some Agencies have a written DBS policy, but others do not
- Can cause significant delay during short timescales for kinship assessments
- Some kinship carers do not have ID required and have to arrange finger printing at police station which can be experienced as oppressive and cause delay.
- Requirements of courts are also variable geographically, with some requiring updates within 12 months of Adoption application. The area where this happens report that nothing additional has ever come to light as a result of this additional check at the Adoption Order.
- DBS checks come in Stage 1 of adoption assessment process and due to the requirement that all Stage 1 checks are complete before applicants can proceed to Stage Two of assessment there are frequently significant delays waiting for DBS checks to be returned.
- Temporarily approved kinship foster carers (Reg 24) will have PNC checks as constitutes 'emergency placement'. PNC check often reveals more police intelligence e.g. police visits,



frequent visitors to household and soft information than in DBS. Information from PNC does not always match information later stated in DBS and usually it is DBS that is missing information

- Threshold at which police intelligence or soft information is shared as part of DBS check is inconsistently applied and in practice neither is frequently shared as part of DBS check therefore there is lack of trust in system that it is sharing essential and required information to inform risk assessments

26 To what extent do you agree that the current arrangements on the disclosure of soft intelligence is appropriate for foster care, kinship care and adoption?

Disagree

If desired, explain your response below:

As above there is variable practice.

- Some 'soft info' including incidents of domestic violence have not been disclosed on DBS checks – geographical variation and interpretation of guidance.
- Threshold at which police intelligence or soft information is shared as part of DBS check is inconsistently applied and in practice rarely shared as part of DBS check therefore there is lack of trust in system
- Police intelligence and soft information is important and includes greater depth than what is held on DBS checks. Police intelligence and soft information needs to be triangulated within assessment to inform risk assessment and identify support needs to mitigate risks

27 In your view, how well are the DBS filtering rules understood by assessing social workers and children's services?

Not very well understood

If desired, explain your response below:

As mentioned, practice is variable in this area with some professionals likely having very clear knowledge of the filtering and some not.

Nuances around filtering and discrepancy is not likely fully understood by social workers. There is likely a training need in this area. CoramBAAF good practice guide has relevant information for practitioners. Adams, P. (2019) Undertaking checks and references in fostering and adoption assessments. London: CoramBAAF.

In the case of adoption not usually the assessing SW who will make a decision as to whether to continue with an assessment when something returns on a DBS. It would be a manager in the adoption agency (either RAA or VAA).

Agencies who are aware that it may take up to 9 months before relevant 'soft' information triggers a change in status on the update service – know that an applicant might be fully assessed and approved



as a foster carer or prospective adopter before anything is known about this and are able to adjust assessments accordingly.

28 In your view, how confident are social workers and children’s services in using the information provided through DBS disclosures to inform their decisions when assessing prospective carers?

Somewhat confident

If desired, explain your response below:

In general social workers will be confident and be able to triangulate decision making accordingly with all the information available (assessment, DBS, health information etc). DBS disclosures are 1 aspect of a multi-faceted assessment. There are times where the information presented is complex and this is where supervision and also panel experience is important. How sensitive information is discussed with carers can be where experience and practice confidence are important.

Kinship perspective

Greater risks can be taken in the kinship context as priority is given to the pre-existing relationship. There is a need for practice guidance around mitigation of risk.

29 Do experiences of the DBS process in assessment differ between kinship carers, foster carers, and adopters? Please explain your response in the text box below.

Yes

Please respond below:

In most cases you would expect the DBS process to be largely the same across Adoption, Fostering and Kinship Care. However, there are differences in kinship care as set out below.

Kinship perspective

In kinship care there may be different practice depending on the legal order and the circumstances of the child and kinship carer. Informal kinship carers many of whom are not known to the local authority (sometimes known as a private family arrangement) are not subject to DBS checks. SGO Regulations do not require a DBS check; although all LAs seek one but Courts have tried to make SGO in the absence of this significant safeguarding information. In reality a child could already be informally living with kinship carers before a PNC or DBS check is undertaken as the legal status of child determines threshold for when DBS is required. This differs from adopters and unconnected foster carers as they would not have a child “placed” with them ahead of DBS checks.

Fostering regulations already allow for a relative of a child to be approved as a kinship foster carer with offences that would otherwise exclude them from being approved as a foster carer for a child not known to them (Regulation 26(8) Fostering Services (England) Regs 2011); this is not well understood and requires greater practice guidance on how to undertake required risk assessment (see Horne and Seth, 2025).



30 We are interested in evidence and examples that illustrate how DBS checks are working as part of vetting procedures for prospective carers. If you wish, please provide (anonymised) case studies or examples that illustrate how current processes on DBS disclosures / police intelligence have influenced assessments on carer suitability.

Please respond below:

Info on DBS check is taken in context of a wider assessment. Whilst a conviction or caution, on its own may not rule something out, in the context of a wider assessment process it will be considered. If a prospective carer does not share information that is then revealed through the DBS check this can be relevant. We know from safeguarding reviews that potentially lack of openness and honesty in some areas can be replicated in others.

Kinship perspective

All information regarding a prospective kinship carer's suitability to care for a child can only be understood in relation to the needs of the specific child and their pre-existing relationship to the child.

At the same time this requires authoritative and robust assessment, which is often undermined by insufficient court assessment timescales. Practitioners would benefit from clearer guidance on proportionate assessment, management and mitigation of risk in the kinship context.

Issue 5: Consistency in handling of allegations for those inside and outside of the care system

31 To what extent do you agree that services currently make the right decisions on whether an investigation into a foster carer is required?

Neither agree nor disagree

If desired, please explain your response:

Feedback we have received is that the current system does not always clearly distinguish between allegations of abuse and standards of care concerns. Issues are often treated through the same procedural pathway even though they involve different levels of seriousness and evidential thresholds. This can result in minor practice concerns escalating unnecessarily into formal allegations processes, which may create anxiety for carers and delay proportionate responses. A clearer framework that differentiates safeguarding allegations from practice or performance issues would therefore improve proportionality and fairness.

Practitioners also highlighted the importance of consistent national guidance on thresholds and decision-making. There was concern that different local authorities and fostering services interpret and respond to allegations in very different ways. This inconsistency can lead to uncertainty for foster carers and professionals and can undermine confidence in the system. Stronger statutory guidance and clearer definitions of when the allegations process should be triggered would help promote greater consistency.



timeliness and procedural clarity has been raised with us. Practitioners have reported that allegations processes can sometimes take a long time to conclude, which can leave carers in a prolonged period of uncertainty and may affect placement stability. Delays can also have wider consequences for children if carers are temporarily unable to accept placements during investigations. Practitioners therefore suggested clearer expectations around timescales, improved case management, and stronger oversight of delays to ensure investigations progress promptly while still being thorough. There is a need for support for foster carers during allegations investigations. Practitioners noted that carers often feel isolated during the process and may not always have clear access to independent advice or advocacy. Improving access to independent support, clearer communication about the process, and better explanation of rights and expectations would help ensure that carers are treated fairly while safeguarding concerns are investigated.

Practitioners also suggested strengthening review and oversight mechanisms within the allegations process. This could include clearer opportunities for decisions to be reviewed where there is disagreement about the handling of an allegation, as well as stronger managerial or independent oversight to ensure processes are followed appropriately.

Finally, some practitioners emphasised the importance of training and learning across the system. Professionals involved in handling allegations, including social workers and managers, would benefit from regular training to ensure they understand the distinction between safeguarding allegations and standards of care issues, apply thresholds consistently, and conduct investigations in a proportionate and trauma-informed way.

Suggested improvements:

- clearer differentiation between allegations of abuse and standards of care concerns
- consistent national guidance and thresholds for triggering the allegations process
- improved timeliness and case management of investigations
- better support and communication for foster carers during investigations
- stronger review and oversight mechanisms to ensure fairness and consistency
- enhanced training for professionals handling allegations.

Feedback from practitioners and carers was that addressing these issues would improve confidence in the system and ensure that allegations are handled fairly, proportionately and consistently, while maintaining the paramount focus on safeguarding children.

Kinship perspective

On occasions kinship foster carers may be more at risk of a 'standards of care' investigation due to the wider tensions regarding the usefulness of the fostering framework as a mechanism for enabling children to live with their kin. This will hopefully be addressed through the law commission project. Feedback from kinship practitioners consistently describes the mismatch as "fitting a square peg into a round hole". Rigid interpretation of NMS can result in some kinship foster carers being 'pulled' into standards of care investigations unnecessarily.



32 To what extent do you agree that services currently make the right decisions on how to protect children during investigations into allegations against foster carers?

Neither agree nor disagree

If desired, please explain your response.:

This is subjective on services and practice. We are aware that practice varies greatly. There is need training and good support from managers. In a fragmented workforce there is greater risk of this being handled ineffectually.

We welcome the proposal for a senior manager to sign off any child being potentially moved due to an allegation as this provides a clear level of oversight. However, we are aware that in many cases this will already happen in practice.

"...allegations feel really tough for everyone, making this a kinder process can only be a good thing." (feedback from CoramBAAF member).

"Agree with the Government's proposed changes to the allegations process because they introduce a much fairer, more transparent, and proportionate approach for foster parents while still maintaining strong safeguarding for children. Proposals such as continuing fee payments during investigations, requiring senior manager sign-off before any child is moved, and ensuring thorough, holistic risk assessments will help prevent unnecessary disruption and reduce the emotional and financial strain that allegations can cause." (feedback from CoramBAAF member).

We would welcome any updated guidance and national minimum standards to be very clear about how children should be supported where there are standards of care or allegations made. There should also be a recognition within this that they may need additional support during and after the process and it should be clear how this is being delivered and who by. For this to be effective there needs to be appropriate funding available.

Kinship perspective

The nuances and context of kinship foster care mean the circumstances for a child should be seen differently, and pre-existing relationship may protect the child from an unnecessary move pending outcome of investigation, but may equally result in an unnecessary and poorly planned move if NMS applied too rigidly.

33 To what extent do you agree that incidents should only be treated as formal allegations when the Section 47 threshold is met (i.e., where there is reasonable cause to suspect a child is suffering or likely to suffer significant harm)?

Agree

If desired, please explain your response.:



The threshold for s.47 is generally widely understood and considered in relation to each individual child. Children in care are more likely to have experienced harm and neglect and therefore may have higher levels of individual needs in some instances because of this. When allegations are considered this should be acknowledged. Further guidance in relation to allegations may help this, including guidance for LADOs.

To speed up the process related to allegations, it will likely require additional resourcing for local authorities, LADOs and the police. LADOs, may need assistance to ensuring that this role is being executed in a robust, fair, and consistent manner across all local authorities, if new measures are introduced.

34 To what extent do you agree that incidents that do not meet the Section 47 threshold should be handled through less formal routes (such as Standards of Care concerns)?

Agree

Issue 6: Innovation

35 To what extent do you feel that current regulations and guidance limit the ability of fostering services to implement new approaches?

To some extent

36 What specific regulations or guidance have prevented you from implementing new approaches or being innovative. For each regulation or guidance identified, please explain how you feel this has limited innovation.

Please respond below:

Staff are limited by case management systems, data sharing issues , compliance with GDPR and confidentiality. Compliance with these do need to remain integral to any changes. There is an opportunity for workforce (foster carer and social worker) challenges to be addressed through new approaches and innovation. We are aware that practitioners are improving practice through innovation already and in most cases, the limit is internal resources, funding, training and staff availability and capacity.

There is a worry that some foster carers lack the confidence to engage with digital tools so this will require training and additional support from social workers, which will need to be funded as part of any innovation funding.

“Foster carers need the right support at the right time for the children in their care - strengthening supports available through school, CAMHS, access to alternative therapeutic support. Expanding therapeutic training for both foster carers and for their supervising social workers. This could be strengthened by expanding the training to social workers too, supporting the workforce to fully see the child and through a trauma informed lens.” (feedback from CoramBAAF member).



Our members have suggestions about approaches that could improve the health assessment process and we would welcome the opportunity to share proposals with officials.

Kinship perspective

The usefulness of the fostering framework as a mechanism for enabling children to live with their kin, therefore including regulations and guidance, are a wider issue that will hopefully be addressed through the law commission project.

37 What (if any) innovative or alternative approaches to fostering have you implemented in your service?

Please respond below:

We have worked with Mott Macdonald on the Fosterlink programme between 2024 and 2026. This supported a significant number of local authorities and regions to consider their recruitment processes and identify areas for improvement. Feedback was overwhelmingly positive from those who received the service and those who attended opportunities to share and listen to promising practice. Similar models and approaches could be used again.

Kinship perspective

The usefulness of the fostering framework as a mechanism for enabling children to live with their kin, therefore including regulations and guidance, are a wider issue that will hopefully be addressed through the law commission project.

38 How do current inspection frameworks influence your willingness to innovate?

Please respond below:

39 What evidence-based models have you tried?

Please respond below:

There is much that can be learnt from the reflective fostering programme in supporting retention of foster carers, reducing burnout and improving retention.

Midgley, N., Irvine, K., Rider, B., Izzidien, S., Stemp, R., Flanagan, R., Sharma, S. and Midgley, N. (2026) The Reflective Fostering Programme – Improving the wellbeing of children in care through a group intervention for foster carers: A randomised controlled trial. *Adoption & Fostering*.

Available at: [The Reflective Fostering Programme – Improving the wellbeing of children in care through a group intervention for foster carers: A randomised controlled trial \(Nick Midgley, 2026\)](#)

Over 12 months, the children of those carers attending the Programme did not yield significantly greater improvements in children’s psychosocial functioning (the primary outcome) or emotion regulation compared to usual support; however, there was evidence of significantly enhanced carers’ reflective capacity, reduced carer burnout and stress levels and improved child–carer relationships. The



health economic evaluation demonstrated the Programme had a higher probability of being cost-effective compared to usual support

40 Please describe any outcomes observed from these innovative or alternative models. In your response, please make clear which model you are referring to, and how the outcomes have been identified. This may include: Supported by published evidence (please provide references); Supported by internal research or evaluation; Anecdotal experience; What outcomes have you observed from these models?

Please respond below:

Midgley, N., Irvine, K., Rider, B., Izzidien, S., Stemp, R., Flanagan, R., Sharma, S. and Midgley, N. (2026) The Reflective Fostering Programme – Improving the wellbeing of children in care through a group intervention for foster carers: A randomised controlled trial. Adoption & Fostering.

Available at: [The Reflective Fostering Programme – Improving the wellbeing of children in care through a group intervention for foster carers: A randomised controlled trial –\(Midgley,et al, 2026\)](#)

Issue 7: Removing barriers to kinship and known adults providing care

41 To what extent do you think the Kinship Care guidance (published October 2024) is applied in practice when assessing prospective kinship foster carers?

Neither agree nor disagree

If desired, please explain your response:

From engagement with members its very clear practice in this regard is very variable and inconsistent. Assessment practice consistently takes a different approach to assessment of mainstream foster carers, and as far as we are aware all LAs use a different assessment template whether that be

CoramBAAF Form K, still using CoramBAAF Form C or a local authority specific template. Form K amplifies the voice of the child and the significance of the pre-existing relationship, which is very different from assessment of mainstream foster carers, as the voice of the child and the pre-existing relationship speak to the match between the specific child and their extended family member.

However as both fostering approval and SGO recommendation rely on specific information being provided, assessment is still detailed. From our engagement with members, both to inform this consultation response but also more broadly, it is evident that the guidance is more successfully applied in practice when there has been focused training provided to both assessing social workers and panel members, on where the flexibility can be applied.

CoramBAAF has published detailed practice advice based on discussions with a working party consisting of practitioners, managers, kinship carers and kinship care researchers. National Minimum Standards for Fostering: Implications for kinship foster care in England <https://corambaaf.org.uk/national->



[minimum-standards-fostering-implications-kinship-foster-care-england?check_logged_in=1](#) This potentially provides more detail that is welcome by practitioners.

42 In your view, what would help ensure the Kinship Care guidance is embedded effectively in practice when assessing prospective kinship foster carers?

Please respond below:

Based on the positive feedback on the CoramBAAF practice note, we think the Kinship Care Guidance could potentially go further to make the points more explicitly, for example around some of the specific expectations of foster carers such as recording, attending training and bedroom space, as per CoramBAAF's interpretation in the practice note.

CoramBAAF Form K deliberately does not require any cross referencing to NMS but we are aware some Panels still request it, therefore more explicit reference to this issue would be helpful in the Guidance.

Ensuring panels understand kinship care is more than a tick box exercise. The Statutory Guidance states panels "The panel members should also receive specific training on kinship care, and have representation from person(s) with either lived or professional experience of kinship care as this will aid the panel's consideration of matters before it". We recommend strengthening this expectation so that kinship specific training becomes an essential requirement and is required to be updated regularly as part of mandatory annual training for panel members.