



Association of **Lawyers for Children**

Promoting justice for children and young people

**Consultation response:
Improving Help and Child Protection: Revised Framework**

Dated: 4 September 2026

Response of the Association of Lawyers for Children

**Contact: ALC Administrator
Association of Lawyers for Children (ALC)
1GC Family Law
10 Lincoln's Inn Fields
London
WC2A 3BP
admin@alc.org.uk
Website: www.alc.org.uk**

The Association of Lawyers for Children (hereafter “ALC”) is a national association of lawyers working in the field of children law. It has over 1,400 members, mainly solicitors and family law barristers who represent children, parents and other adult parties, or local authorities. Other legal practitioners and academics are also members. Its Executive Committee members are drawn from a wide range of experienced practitioners from both sides of the legal profession practising in different areas of the country. Several leading members are specialists with over 20 years’ experience in children law, including local government legal services. Many have written books and articles and lectured about aspects of children law and hold judicial office. The ALC exists to promote access to and equality of justice for children and young people within the legal system in England and Wales in the following ways:

- (i) lobbying in favour of establishing properly funded legal mechanisms to enable all children and young people to have access to justice.
- (ii) lobbying against the diminution of such mechanisms.
- (iii) campaigning and advocating on against any form of discrimination which may affect children within the family justice system.
- (iv) providing high quality legal training, focusing on the needs of lawyers and non-lawyers concerned with cases relating to the rights, welfare, health and development of children.
- (v) providing a forum for the exchange of information and views on the development of the law in relation to children and young people.
- (vi) being a reference point for members of the profession, governmental organisations and pressure groups interested in children law and practice; and
- (vii) funding or co-funding research where we perceive gaps in knowledge or evidence relating to changes in policy and practice in children proceedings.
- (viii) Lobbying to preserve, promote and protect the rights of children of the jurisdiction of England and Wales and to seek the incorporation of the United Nations Convention on the Rights of the Child, 20 November 1989 [‘UNCRC’] into domestic law; and its implementation and recognition in the courts of England.

The ALC is a stakeholder in respect of all government consultations pertaining to law and practice in the field of children law and welcomes this opportunity to provide its views in respect of this consultation.

Introduction

The Association of Lawyers for Children (ALC) is grateful for the opportunity to respond to this consultation. We have confined our response to this consultation to those questions where our members have expertise and/or experience.

The ALC endorses the commitment to improving services for children and families and, in particular, to strengthening the voice of young people. The drive towards early, targeted help which supports families is welcome. We note, however, the pace of change and the challenges for delivery. Local government reorganisation; the recruitment of qualified, stable personnel; and multiagency working are significant challenges, which cannot be overcome through guidance. While funding commitments are in place, it is unlikely to be sufficient to secure enduring change. Resourcing remains a major obstacle to access to the therapeutic support which is necessary to overcome the multifactorial difficulties experienced by many families.

The ALC acknowledges the extensive changes already made to Working Together and the National Framework. There is now a vast body of guidance. We invite consideration of the need to streamline this to ensure it is accessible and manageable, particularly for those working in front line services.

Response to Consultation Questions

Question 1

The ALC **agrees** that these proposals will strengthen the voice of children and families, including those who are under-represented or marginalised, in multi-agency safeguarding arrangements.

Question 2 – Further comment

The expectations in the guidance are welcome, however, effective implementation is essential. It is necessary not only for engagement to be facilitated but for the views of children and families to be taken into account and given appropriate weight in decision-making. There must be a strong emphasis upon ensuring that the child's perspective is heard in any function that the MACPT exercises. Professionals engaging with families and young people should adopt a trauma informed, culturally competent approach to ensure that engagement is meaningful and accessible to all, including disabled children and children in care.

Question 3

The ALC **agrees** that the proposed changes will improve independent scrutiny across partnerships, including how effectively it supports shared learning and continuous improvement in multi-agency child protection practice, while still allowing sufficient local flexibility. Reinforcing independence and oversight are particularly important.

Question 5

The ALC **agrees** that the proposed changes would improve the consistency and effectiveness of safeguarding responses to concerns about adults who work with children in any capacity.

Question 6

The ALC **agrees** that this approach and proportionate LADO involvement would improve consistency and outcomes for children.

Question 7 – Further Comment on MASAs and LADO

When it works well, the LADO performs a vital function. When it does not, the most vulnerable children are at risk. The ALC welcomes the proposed greater clarity and definition as to the function and accountability of the LADO role. We recognise the need for flexibility to take account of local arrangements. However, minimum expectations are necessary, in particular in respect of the training, experience and supervision of the LADO. Effective oversight recorded decision-making and routes to escalation are essential for the LADO to be a meaningful and reliable safeguard for children.

Question 8

The ALC **agrees** that Targeted Early Help should be removed and all Family Help support and services should be provided under section 17.

Question 9 - Please outline the reason for your answer.

The ALC supports the proposal to bring all Family Help within section 17 as this will provide a clearer and more coherent statutory offer for children and families. The current distinction between Targeted Early Help and Child in Need can result in repeated assessments, transitions between services, inconsistent practice and delay. A single framework should promote greater continuity and reduce unnecessary handoffs. Further, section 17 provides a clear statutory structure for support to be assessed and delivered and there is clear domestic caselaw guidance from the appellate courts about the operation of the duties therein. It increases accountability for children and their families, the ALC submits.

It is essential that this change should strengthen, rather than dilute, the duties owed to children in need. Guidance should make clear that the child's welfare, wishes and feelings remain central, and that Family Help must not delay section 47 enquiries or other protective action where there is reasonable cause to suspect significant harm.

Implementation must also be properly resourced. The investment through Families First is welcome, but expectations on local authorities continue to expand. Funding should therefore be considered alongside the growing range of services it is expected to support and the workforce capacity required to deliver them consistently.

Question 10

The ALC **agrees** that these changes will strengthen the use of Family Networks in keeping children safely at home.

Question 11

The ALC **partially agrees** with the statement *To make family network engagement more central to children's services, guidance should state that existing processes including family help plans, child protection plans and child protection conferences should become more aligned to the principles of Family Group Decision Making, where safe and appropriate.*

We address below the absence of clarity as to the intended distinction between application of a

Family Group Conference [FGC] approach – as carefully designed and defined in the Family Rights Group work- and application of a *Family Group Decision Making* process. Care must be taken not to undermine the highly effective FGC process or adjust its objectives into a decision-making forum. If it is contemplated that the FGDM will utilise a different structure and endpoint to that used in FGCs and imports decision making into the process then the ALC does not support the alignment contemplated in the statement above.

Question 12

The ALC **strongly agrees** with the proposition that local authorities be required to provide a support plan for children returning home on a supervision order. However, we note that most local authorities provide such support already. There is an expectation, further to the report of Public Law Working Group, that local authorities prepare a supervision order support plan which, in the case of rehabilitation, would include a transition plan.

Question 13 - Is there anything else you would like to tell us about Family Help, Family Networks, Family Group Decision Making, Family Network Support Plans or reunification?

The ALC supports earlier, relationship-based help and greater use of family networks where this is safe and in the child's best interests. However, the child's welfare, voice and lived experience must remain central. Children should be supported to express their wishes and feelings directly, with adjustments for age, disability and communication needs.

Family-led approaches must not create a presumption in favour of family consensus where safeguarding concerns remain. Particular care is needed where there is domestic abuse, coercive control, family rejection or other power imbalances, and practitioners should recognise that a child's support network may extend beyond biological relatives.

The ALC are unclear what in practice Family Group Decision Making [FGDM] will involve; and particularly whether it will in practice follow the Family Group Conferencing [FGC] model accredited by the Family Rights Group. The FGC model enables a family to come together to make a plan to address concerns about their child's welfare - it is not a decision making forum. Parents can be vulnerable participants in a family group conference, in some families the weaker partner in the dynamics, and care must be taken to ensure that decision making does not take place in that environment without parents having an opportunity for reflection, support and, where necessary, legal advice. Moreover the FGDM duty contained in the Children's Wellbeing and Schools Act 2026 fails to centre/adequately promote/support a voice for the child within an FGDM forum, and nothing in the paper addresses this. If decision making about the child, as opposed to the creation of a family proposal to respond to concerns, is taking place in that forum then this is a serious procedural flaw and leaves the subject child without inherent procedural protections.

The ALC welcomes Family Network Support Packages where practical or financial assistance can enable children to remain safely within their families. Poverty alone should not be treated as neglect.

The ALC also welcomes the emphasis on planned reunification. The priority should be effective, accountable support plans based on the evidence and findings of care proceedings, with clear contingency arrangements where risks increase.

Finally, reform success depends on sufficient funding, workforce capacity, training and specialist services. While Families First investment is welcome, funding must be considered against the scale of the reforms and the responsibilities they create.

Question 14

The ALC **strongly agrees** that the following MACPT functions should be prescribed in the regulations but we do not agree that all of the functions set out are appropriately placed with them:

- i. provide advice and consultation for practitioners who need MACPT expertise;
- ii. determine whether the significant harm threshold has been met;
- iii. convene and chair strategy meetings;
- iv. lead or oversee multi-agency investigations (as required);
- v. convene and chair child protection conferences;
- vi. oversee the development and delivery of child protection plans, and keep these plans under review;
- vii. maintain knowledge of all children who are the subject of section 47 enquiries or on a child protection plan;
- viii. contribute to reporting requirements aligned with statutory safeguarding partner duties to prepare and publish reports on local safeguarding arrangements.

We **disagree** that it should be the function of the MACPT to decide **whether to move into pre-proceedings for care and supervision orders and the Public Law Outline (PLO) process.** MACPTs should contribute and have input, but most local authorities have governance around this which sits at senior level and provides rigorous oversight. There must be care taken to ensure that MACPTs are not decision makers for the public body. A public body's decisions have to be taken by the person who is accountable for it, it must be reasoned and the LA must be accountable for its decision making process as a whole and the ultimate decisions have to be reviewable. The MACPT should not be the decision makers, the ALC submits. The ALC has concerns that the MACPT will not have time given to it to perform the important function of deciding whether to move to pre proceedings and/or the PLO process. These teams are not currently resourced for this. Nor will the members of the MACPT have read all assessments in pre-proceedings (for example). MACPTs will sit under different AHOS/HOS arrangements in many LAs than the allocated SW and not be privy to the nuanced information that can be necessary to make a decision as to risk management and when the time is reached to go into a pre-proceedings process, the ALC submits.

Many local authorities have a panel chaired and attended by senior local authority members across the whole service (all parts of it) and including its legal department; a social worker will present their case and seek authority to go into any legal process - pre-proceedings or to issue care proceedings. That process is good practice. Not all local authority authorities do this but should be required to do so. A process such as this is structured for an intellectually robust deconstruction of the evidence for the legal step to be taken and puts it to the assay. That is a clear safeguard against peremptory measures and provides a holistic approach to risk management and care planning. A procedure of this kind is procedurally compliant with child rights conventions and provides inherent procedural protections for parents and children. MACPTs cannot mirror those procedural protections.

Decision making by committee is not robust and lacks accountability.

We **strongly disagree** that it should be the function of the MACPT to **provide relevant evidence for Emergency Protection Orders, Child Assessment Orders, care and supervision orders.** The MACPT should contribute to the evidence and provide a check and balance on whether the evidence is objectively presented and whether there are gaps in the relevant evidence. However, there needs to be a professional who is immersed in the evidence and can give an account for the risk analysis and care planning in written and in oral evidence at a hearing should it be required. Seeking an EPO/CAO and ICO are some of the most draconian decisions taken by an LA and the evidential justification for the risk management balance is a nuanced one, very often. Parents and children are entitled to challenge that and to challenge the witness who has most closely worked with the family. That may include disputing the assumptions made or the conversations held or to suggest that the information is partial, for example. The social worker is well placed to give a first-hand account about the matters which make up the evidence for the application. It remains important for there to be accountability for the family and child and for them to know who said what and why they said that. There is a considerable danger of loss of information if this task is reserved to an MACPT whose professionals are speaking for matters in which they may have had limited direct involvement. Where the MACPT professional is not as immersed in the detail of the family dynamics, as the family social worker is, for example, the court may not be given correct information or the professional may fail to give crucial information in answer to questions. This may serve to leave a child without a protective order as the person from the MACPT sent to court to account for the written evidence was not equipped with sufficient knowledge of the family to answer the challenges.

The ALC also proposes that the regulations may also want to provide that MACPTs will contribute to relevant evidence, where necessary, in private law proceedings, for example for reports under s.37 Children Act 1989. We do not agree that MACPTs should provide that evidence directly. This should remain the function of the allocated social worker as the MACPT does not hold the requisite day to day detail.

The initial policy paper published on the 7 January stated:

“The power is expressly limited to prescribing the MACPT functions required to support the local authority to investigate whether a child is suffering or likely to suffer significant harm. Our intention is for the regulations to require MACPTs to deliver the following functions:

- *convene strategy meetings*
- *lead section 47 enquiries*
- *convene child protection conferences and forums*
- *oversee the development and delivery of child protection plans*
- *keep child protection plans under review*
- *provide case consultation for practitioners who need MACPT expertise*
- *maintain an understanding of patterns of significant harm in the local area and agency responses”*

Whilst the ALC agrees an expansion of functions beyond this policy paper, as set out above, the ALC does not consider that the line should be crossed into the MACPT becoming the

decision maker and evidence-gatherer for pre proceedings and court proceedings. This serves to reduce accountability by the LA for those decisions and is likely to lead to a reduction in the quality of the evidence made available to the court both in writing and orally.

Question 15

The ALC **strongly agrees** that the statutory guidance should set out that MACPTs should have an agreed local multi-agency framework or approach allied to the national framework.

The ALC considers that it would be beneficial for any local framework or approach to be set out in writing in clear terms and be easily accessible.

Question 16

The ALC **strongly agrees** that statutory guidance should include an expectation that:

- i. LCPP's chair strategy meetings.
- ii. MACPT members ensure appropriate partner agency representation in strategy meetings.
- iii. MACPTs record whether the threshold decision has been made alongside reasons for that decision.

In addition, the ALC welcomes the proposal to update guidance to clarify that where a child is subject to public or private legal proceedings, MACPTs should invite the child's guardian or representative to attend the strategy meeting.

Multi-agency attendance at strategy meetings is crucial and attendance at the meetings should be prioritised. We recognise, however, that strategy meetings may be convened on an urgent basis with little notice when a safeguarding issue emerges. Where it is not possible for any partner agency to attend a strategy meeting, the ALC suggests that the absence is recorded in the minutes and that MACPTs allow for an update to be provided in writing which should also be included in the minutes from the meeting.

Question 17

The ALC **strongly agrees** that within 5 days of the strategy discussion at which section 47 investigations were initiated, the MACPT:

- i. Reviews the progress of the s47 enquiry.
- ii. Sets a timeframe for the initial child protection conference, where an extension to the 15-day timeframe is needed.
- iii. Records the decision and reasons for that timeframe.
- iv. Agrees and documents a clear interim safety plan for the child.

Question 18

The ALC **strongly agrees** that statutory guidance should set out that initial child protection conferences should take place as close to the 15 day-timeframe as possible, unless there are exceptional circumstances agreed and recorded by the MACPT.

The ALC would add that any exceptional circumstances should be clearly set out in the minutes from the MACPT meeting and that this decision is kept under active review.

Question 19

The ALC **strongly agrees** that Lead Child Protection Practitioners embedded in the MACPT should chair child protection conferences.

The ALC notes the expectation that the LCPP will work directly with the child. The ALC also supports the guidance that it should be the same LCPP who chairs the initial and subsequent review child protection conferences.

Question 20

The ALC **strongly agrees** that the regulations should prescribe that MACPTs

- i. record decisions to discharge a child protection plan
- ii. identify ongoing support after discharge, including where proceedings begin
- iii. record input sought and obtained from all practitioners involved with the child
- iv. notify all relevant agencies of the decision
- v. notify parents and carers who were invited to the initial child protection conference of the decision
- vi. inform decisions about and support transitions into pre-proceedings and the Public Law Outline, care proceedings, reunification and wider Family Help, early help or universal services

The ALC would add that any ongoing support after discharge is to be clearly set out in the minutes from the meeting, including where the support is to be accessed, whether there is agreement from the parent /carer to access support, the timescales for such support and what safeguarding action may be taken in the event of non-engagement with the identified support.

Question 21

The ALC **agrees** that statutory guidance should continue to support local flexibility in assigning pre-proceedings and court work.

Question 22

The ALC **strongly agrees** that regulations should state that nominated MACPT members must, as a minimum:

- i. have knowledge and understanding of the statutory child protection framework.
- ii. have an applied understanding of what constitutes actual or likely significant harm in all contexts (including inside and outside the home, and online) and across all age ranges (from unborn babies to teenagers).
- iii. contribute effectively to assessment of needs, understanding the indicators and drivers of abuse, neglect and exploitation.
- iv. build an accurate and comprehensive understanding of the child's daily life to establish the likelihood of significant harm.
- v. act inclusively and foster anti-discriminatory environments in which it is safe to challenge and respond to the needs and experiences of children and families of different ethnic, cultural and religious backgrounds.
- vi. possess the ability to assess information for timely, effective and reliable multi-agency decision-making.

- vii. respect and constructively challenge multi-agency perspectives to reach the best intervention and outcome for the child.
- viii. ensure interventions are prompt, evidence-based and tailored to the child
- ix. listen and take into consideration what children tell them (verbally or non-verbally) to help them and their family.

Question 23 - Please provide any further views on how regulations and statutory guidance should be aligned with existing national competency and skill frameworks, to support effective child protection practice

As the consultation states, there are already national competency and skills frameworks and statutory guidance for child protection expertise across the safeguarding agencies. The consultation gives the example of The Royal College of Nurses “Safeguarding children and young people and children and young people in care”.

The ALC supports guidance that safeguarding professionals in attendance at MACPT meetings are complying with their own professional competency guidance/requirements, which will no doubt include provisions for professional training and development to be up to date. In particular, there should be an expectation that those leading investigations of allegations made by children have completed the requisite training and can implement the Achieving Best Evidence guidance.

In addition, the ALC would propose that if any member of the MACPT has a concern about the qualification or experience of another MACPT member that there is a route for this to be raised in a child focussed, respectful and sensitive manner so as to ensure the best possible outcome for the child. The guidance should include a mechanism for issues to be escalated, where appropriate, within partner organisations to ensure that those attending the MACPT are sufficiently experienced to address the safeguarding concern.

Question 24

The ALC **agrees** that the eight relevant agencies that we have listed should be specified in regulations as in scope to enter into co-operation memorandums with the MACPT, namely:

- i. Probation service.
- ii. Youth Offending Teams (YOTs), secure colleges, training centres, young offender institutions.
- iii. British Transport Police (BTP).
- iv. Charities working with children and/or their families.
- v. Religious organisations.
- vi. Schools and further education institutions.
- vii. Pupil Referral Units (PRUs) and alternative provision .
- viii. NHS trusts and foundation trusts.

The ALC notes that this list does not specifically reference health visiting services or include GPs who will not be covered by reference to NHS Trusts and Foundation Trusts, but with whom it would also be sensible to enter into co-operation memorandums, given the crucial information they often hold.

Question 25 - Is there anything else you would like to comment on in relation to

multiagency child protection teams?

The ALC would add that it is important that MACPT members ensure clear minutes of meetings are taken and that safeguarding concerns and recommended action are clearly recorded. Where possible, minutes of any meetings should be agreed by MACPT members.

Question 26

The ALC **strongly agrees** that statutory guidance should set out the elements below, to drive consistent and effective protective action for children suffering or likely to suffer significant extra-familial harm:

- i. Situating parents/carers as partners alongside practitioners, where safe to do so.
- ii. Supporting parents, both those who do and do not have wider vulnerabilities requiring a children's social care response, to ensure they can continue to support their child(ren).
- iii. Working with the child so they can engage and participate in the process, ensuring the outcomes meet their needs (including previously unidentified or unmet needs) and make them feel and be safer.
- iv. Consistent application of the existing Section 47 thresholds for likely or actual significant harm to extra-familial harms.
- v. A focus on the contextual drivers of harm in all outcomes.
- vi. The role of MACPTs in co-ordinating partners who can create safety, or risk, in extra-familial contexts.
- vii. Clarity on the appropriate escalation process when the primary harm is extra-familial and action is needed from agencies and services rather than families, meaning e.g. care proceedings are an ineffective escalation.
- viii. A requirement for clear and accountable actions for professionals responsible for places where children are harmed (for example, community areas, businesses, public spaces, online).
- ix. Consistent participation in disruption activity.

Question 27

The ALC **strongly agrees** that statutory guidance should set out the following expectations:

- i. consistent use of strategy discussions, section 47 enquiries and child protection conferences for looked after children.
- ii. multi-agency input into child protection responses and care planning through the multi-agency child protection team and the LCPP role.
- iii. clarity of roles, responsibility and lines of accountability of different practitioners in the team around the child.
- iv. alignment of care planning and child protection processes including reviews and integrated plans.

Question 28

The ALC **disagrees** that the current statutory framework for help, support and protection is clear enough about how to effectively safeguard children in kinship care.

Question 29 - If you do not agree, how would you like to see the statutory framework

strengthened?

The ALC agrees with the proposition that there should be clear expectations about how practitioners should help, support and protect children in kinship care. Deficiencies in this area have been identified over many years. There is a particular need to recognise and empower kinship carers through training, access to which is often restricted to those carers who hold special guardianship orders or is limited to foster carers. Further, there is a need to support kinship carers to manage children's contact with their parents, in particular to assist them to identify and respond to safeguarding risks. Carers may require professional support - rather than fearing criticism – effectively to enforce boundaries with parents, in the child's best interests. Resourcing, particularly to facilitate supervised contact, is scarce. Further, therapeutic services and resources are largely on a signposting basis and there is a lack of consistency as to the availability of therapeutic life story services for those children who need something more than a piece of social work about their journey in alternative care. The absence of these services places avoidable strain on kinship placements and, ultimately, may be harmful to children who experience disruption to important relationships or are exposed to unmanaged risks in contact.

Recent developments in terms of resourcing kinship placements are welcome but the statutory imperative to place within kinship care where safe to do so should be strengthened but with clear funding and resources to support such placements and statutory confirmation that Family Group Conferences are always required. This should take place alongside proper reviews to ensure that vulnerabilities are not simply identified but that work is undertaken to remedy them.

In the first three years of placement, looked after children who have left care to a kinship placement under an SGO should have parity of access to LA service provision and service priorities as children who remain in care, the ALC submits.

Question 30

The ALC **agrees** that the DfE should update:

- i. the definition of children sexual exploitation.
- ii. the accompanying guidance.

Question 31

The ALC **agrees** that the following are core aspects of child sexual exploitation:

- i. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity.
- ii. It could be in exchange for something the victim needs or wants
- iii. It could be for the financial advantage or increased status of the perpetrator or facilitator.
- iv. Apparent consent is irrelevant, the victim may have been sexually exploited even if the sexual activity appears consensual.
- v. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Question 32

The ALC **neither agrees nor disagrees** that the following should be included in the definition of child sexual exploitation:

- i. Child sexual exploitation can occur where a child or young person under 18 is controlled, coerced, manipulated or deceived through the use of, or threat of, violence to engage in sexual activity. This violence and intimidation may be directed at any person and it only matters if the victim perceives this to be real.

The ALC expresses caution at the including of the words ‘it *only* matters’. Perspectives of young people, their lived experience and allegations they may make must be taken seriously. A child’s account of their experience may be the trigger for safeguarding measures to be implemented. However, professionals working with young people must be curious and retain objectivity. Investigation of any allegations should be undertaken with an open mind. While a professional should never simply dismiss a child’s account, there is a need to be being mindful of how perceptions may be manipulated or events misconstrued in line with a child’s age, understanding and experience. Decision-making should have an evidential foundation. To do otherwise risks ultimately undermining safeguarding efforts.

The ALC **strongly agrees** that the following feature should be included in the definition of child sexual exploitation:

- ii. Child sexual exploitation can occur for sexual gratification.

Preparatory acts of exploitation such as coercion, manipulation or deception which lead a child to feel under a sense of obligation to the abuser should be included in the definition, the ALC submits. It is part of a continuum of behaviour.

Question 33

The ALC **agrees** that Working Together and the National Framework currently reflect good practice in responding to potential extreme violence by children.

The ALC notes that these documents do represent areas of good practice. However, there is clearly significant work to be done, as identified by the Southport Inquiry.

Question 34

The ALC takes the view that the following areas Working Together and the National Framework could better reflect best practice in responding to extreme violence by children:

- i. The role and responsibilities of children’s social care
- ii. The role and responsibilities of local partners
- iii. Information sharing
- iv. Working with child mental health and special educational needs
- v. Signposting to services and interventions
- vi. Children’s online activities
- vii. Working with families affected

The ALC notes that Guidance and Reviews over many years highlight the importance of best practice. However, what is repeatedly missing is the effective and consistent implementation

of such recommendations. Signposting is helpful but services need proper resourcing, so referrals are accepted and therapeutic and other support is given, not just to young people but to their caregivers, so that they are diverted away from harmful 'welfare' outcomes such as Deprivation of Liberty applications or Secure Accommodation.

Question 35 - What expectations should there be across Working Together and the National Framework for how local authorities work with their multi-agency partners to respond to extreme violence and risks posed by children to others?

The ALC submits that there must be an emphasis on supporting children and recognising harm caused to them while simultaneously recognising that they may cause harm. Regulations around information sharing and inter-agency working already exist, and it is unlikely a further layer of regulation will assist. Concrete measures are required to improve information sharing such as MACPTs. However, this must be allied with sufficient resources to ensure therapeutic and other support can be made available to assist young people at times of crisis, as well as to support their carers. Additionally, this specialist area would benefit from closer liaison between the criminal justice and social care fields in a structured and uniform manner.

Alongside the public bodies (LAs and mental health teams) working together, there ought to be an emphasis on child and adolescent mental health services and acute mental health trusts identifying formulations, pathways for treatment and support for children manifesting such behaviours, where appropriate, without an undue focus upon how the child falls outside of their purview. Territorial disputes between LAs and child and adolescent mental health services and acute mental health trusts can serve to eclipse the necessity for joint care and therapeutic plans to be drawn up to support a young person or child displaying this kind of behaviour, the ALC submits.

Question 36 - Is there anything else you want to tell us about responding to extra familial harm, protecting looked after children and those in kinship care, or the children's social care response to extreme violence?

There is a need to ensure that Child Criminal Exploitation receives the same review and scrutiny in terms of its definitions and updating to any relevant guidance as child sexual exploitation has received in this Consultation.

Question 37: To what extent do you agree that the expectations in the National Framework for children in care and care leavers supports children to have enduring relationships?

The ALC agrees that the expectations in the *Children's Social Care National Framework Statutory Guidance on the purpose, principles for practice and expected outcomes of children's social care March 2026: Outcome 4: children in care and care leavers have stable, loving homes* sets out a clear commitment for children to have enduring relationships.

For this commitment to be realised it requires significant investment. The ALC considers that the provision of resources in this area may serve to reduce the dependency of young people leaving care on other state resources. Staying put arrangements, where available, are invaluable. Sadly, however, too many teenagers leaving care are housed in semi-independent accommodation, isolated, with few links and limited enduring relationships. Personal advisers often lack the requisite experience and time to provide effective support. The experiences of

care leavers highlight the failure of the care system, as evidenced by number of care experienced young people who are NEETS and the enduring statistics about outcomes for care experienced people, particularly in the prison population. Effective corporate parenting requires both resourcing and commitment to avoid multigenerational cycles of harm.

The ALC notes that the first commitment in Outcome 4 is that “children and young people are best looked after and protected by a network of enduring and caring family relationships.” The ALC whole heartedly endorses this commitment. However, there are pressures, particularly the timetable for public law proceedings, which may mitigate against this outcome. We invite a review of whether there is currently sufficient policy coherence when aiming for both permanence and the real possibility of family reunification.

Question 38: What benefits or difficulties can you see in separating Outcome 4 of the Children’s Social Care National Framework into two distinct outcomes: one focusing on looked after children and one focusing on care leavers?

The ALC recognises that challenge of ensuring that guidance is sufficiently detailed without being unwieldy. To be effective, guidance needs to be accessible. Separating the outcomes carries a danger of a lack of coherence. However, the issues faced by looked after children and care leavers are distinct.

Creating two separate outcomes has the advantage of allowing stress to be placed on particularly important matters where there are significant problems in the experience of our members.

The first of these issues is the fact that there remains an enduring failure to prepare young people for adulthood. There is a lack sufficient support. Crucially, there is failure to grapple with the reality that, while a young person turning 18 brings an end to a care order, that young person does not suddenly acquire all the skills and emotional resilience of an independent adult overnight. This is particularly so given that care leavers have typically experienced multiple Adverse Childhood Experiences, which increase their vulnerabilities. By contrast, a young person who is not care-experienced would expect to continue to receive family support in numerous guises post-18.

It is appreciated that the National Standards document commits to the following *Support for care leavers*:

- *Manage effective planning and decision-making for children and young people as they approach and transition to adulthood, allowing sufficient time for plans to be developed and implemented before a child turns 18, or 25 in the case of a disabled child or young person. Liaise and partner effectively with adult social care so that assessments are completed in a timely manner and care leavers can continue to access appropriate support.*

The concern of the ALC, however, is that the wording is insufficiently imperative.

In the experience of our members, it is difficult to engage CAMH services for young people from the age of 17. It is also difficult to secure the cooperation of those who should be providing services at age 18 and onwards. This might involve a failure to support a young person to obtain a diagnosis or an assessment or a treatment plan and thereafter to obtain access to services. The most acute difficulty is in securing the co-operation of ICBs. This issue is most serious where

the young person is placed out of area or is moved from one ICB area to another.

Associated with this, there is a recurring failure to refer relevant issues to the Court of Protection after the age of 16 or prepare to do so between the ages of 16 and 18.

The issue is even more acute for children in residential care because of the current uncertainty about the definition of “Deprivation of Liberty.”

The commitment to providing young people with education is vital for both those who are looked after and those who are leaving care. It is also closely connected to the issue of social networks and friends. School should be in person unless it is not in the young person’s best interests to access the same.

The National Framework should also make reference to Reviewing Officers.

The considerations above support the proposal that the National Framework ought to make separate (distinct) outcomes for looked after children and care leavers.

Question 41: Do you have any overall comments about the potential impact, whether positive or negative, of our proposed changes on those who share protected characteristics under the Equality Act 2010? Where you identify any negative impacts, we would also welcome suggestions of how you think these might be mitigated

The ALC recognises and welcomes the existing commitment to anti-racist and anti-discriminatory practice in the introduction to the 2026 edition of Working Together and would suggest that when the other amendments are made (mainly pursuant to section three of this consultation) that this commitment be incorporated into the main body of the text with a particular view to this being highlighted when addressing “safeguarding” and also “providing support”.

In Section 4 of the consultation, the ALC is mindful of how child protection can arise in very specific instances. These incidences may vary across the country. In most areas, it will be necessary to address issues related to or arising from the needs of disabled children and young people and their parents or carers. It is essential that the necessary competence is established by all who work in the child protection system. There are also issues which arise more or less frequently in different parts of the country – such as forced marriage or female genital mutilation. These can involve acutely sensitive judgments, and a non-discriminatory approach is vital. The ALC submits that this is an issue that must be addressed in the practice standards, frameworks and approaches of MACPTs.

The proposal as concerns “Extreme Violence” in Section 4 needs very close review. It has the potential to be used in a significant number of cases unless careful definition(s) are applied. The ALC is concerned additionally that it must be accompanied by a commitment to anti-discriminatory approaches and the maintaining of proper statistics and review of the same. There remains the possibility that this may disproportionately effect children and young people with disabilities or who are from minority ethnic groups.

As concerns the proposed changes to the *Children’s Social Care National Framework Statutory Guidance*, the ALC considers that it is important that it contains the references that it does to:

- (i) the needs of unaccompanied asylum-seeking children; and

- (ii) support to access specialist immigration legal advice at the earliest opportunity with the aim of resolving the child's immigration status before the age of 18

The latter is a particular example where separate provision for looked after children and care leavers appears in the existing Framework but would benefit from being emphasised still further.

The amendments to the National Framework need to encompass:

- the importance of preservation of a young person's first language – if it is not English;
- the particular significance of the wider family (the importance of "Aunties");
- an explicit acknowledgement of the trauma caused by racism; and
- acknowledgement of the disproportionate number of children and young people who are the subject of deprivation of liberty or otherwise in secure accommodation.

Additionally, the National Framework should acknowledge the importance of gathering statistics on services to children and young people with protected characteristics.

The recent publication: ['You really are on your own': A study of the early deaths of young people who were in care Ashley John-Baptiste Clare Chamberlain August 2026](#) provides an example of the sort of analysis that is possible with a careful reading of relevant statistics.

The other element that needs to be included in any re-examination of the National Framework is the significance of providing the necessary support for children with disabilities and parents and carers with disabilities. As concerns the latter, the membership of the ALC is particularly concerned that its members frequently encounter the following:

- A failure to undertake Care Act 2014 assessments in a timely fashion for parents and carers;
- Chronic delays in preparing Care Act assessments when they are required for young people as they transition to adulthood; and
- The failure to provide mental health support for young people – most especially when placed out of area.

This raises issues for children/parents and carers with disabilities. The language of the Framework ought to be more imperative if it is to be effective, the ALC submits.