

**REPORT TO:** Cabinet  
**DATE:** 14 May 2009  
**SUBJECT:** Final Report – Fostering Service Working Group  
**WARDS AFFECTED:** All  
**REPORT OF:** Legal Director  
**CONTACT OFFICER:** Ruth Harrison  
**EXEMPT/  
CONFIDENTIAL:** No

**PURPOSE/SUMMARY:**

To formally present the Final Report of the Fostering Services Working Group, Overview and Scrutiny Committee (Children's Services).

**REASON WHY DECISION REQUIRED:**

The Working Group has been investigating the Fostering Service provided by Sefton M.B.C. The recommendations within the report will enhance and improve the Fostering Service.

**RECOMMENDATION(S):**

That the report with recommendations be agreed.

**KEY DECISION:** Yes

**FORWARD PLAN:** Yes

**IMPLEMENTATION DATE:**

**ALTERNATIVE OPTIONS:**

Not Applicable

**IMPLICATIONS:**

Please see attached Report

**Budget/Policy Framework:****Financial:**

<b><u>CAPITAL EXPENDITURE</u></b>	<b>2006/ 2007 £</b>	<b>2007/ 2008 £</b>	<b>2008/ 2009 £</b>	<b>2009/ 2010 £</b>
Gross Increase in Capital Expenditure				
Funded by:				
Sefton Capital Resources				
Specific Capital Resources				
<b><u>REVENUE IMPLICATIONS</u></b>				
Gross Increase in Revenue Expenditure				
Funded by:				
Sefton funded Resources				
Funded from External Resources				
Does the External Funding have an expiry date? Y/N	When?			
How will the service be funded post expiry?				

**Legal:****Risk Assessment:****Asset Management:****CONSULTATION UNDERTAKEN/VIEWS**

Please see attached Report

**CORPORATE OBJECTIVE MONITORING:**

<u>Corporate Objective</u>		<u>Positive Impact</u>	<u>Neutral Impact</u>	<u>Negative Impact</u>
1	Creating a Learning Community	√		
2	Creating Safe Communities	√		
3	Jobs and Prosperity	√		
4	Improving Health and Well-Being	√		
5	Environmental Sustainability		√	
6	Creating Inclusive Communities	√		
7	Improving the Quality of Council Services and Strengthening local Democracy	√		
8	Children and Young People	√		

**LIST OF BACKGROUND PAPERS RELIED UPON IN THE PREPARATION OF THIS REPORT**

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**Meeting:** OVERVIEW AND SCRUTINY COMMITTEE  
(CHILDREN'S SERVICES)  
  
CAINET MEMBER - CHILDREN'S SERVICES  
  
CABINET

**Date of Meeting:** 28 APRIL 2009  
5 MAY 2009  
14 MAY 2009

**Title of Report:** FINAL REPORT  
FOSTERING SERVICES WORKING GROUP

**Report of:** C.J. Elwood  
Legal Director

**Contact Officer:** Ruth Harrison  
(Telephone No.) 0151 934 2042

This report contains	Yes	No
CONFIDENTIAL Information/		√
EXEMPT information by virtue of paragraph(s)..... Of Part 1 of Schedule 12A to the Local Government Act, 1972 (If information <u>is</u> marked exempt, the Public Interest Test must be applied and favour the exclusion of the information from the press and public).		√
Is the decision on this report DELEGATED?	√	

**PURPOSE OF REPORT**

To formally present the Final Report of the Fostering Services Working Group.

## REASON WHY DECISION REQUIRED

The Working Group has been investigating the Fostering Service provided by Sefton M.B.C. The recommendations within the report will enhance the Fostering Service.

## RECOMMENDATIONS

- (1) That the Committee agrees the Final Report with recommendations of the Fostering Service Working Group as detailed in paragraph 7.0 of the report;
- (2) That the Committee authorises the Chair in consultation with the Overview and Scrutiny Officer to amend the Final Report accordingly as a result of comments from this meeting;
- (3) That the report with recommendations be referred to Cabinet Member – Children’s Services for information; and
- (4) That the report with recommendations be referred to the Cabinet for approval.

## Corporate Objective Monitoring

<u>Corporate Objective</u>		<u>Positive Impact</u>	<u>Neutral Impact</u>	<u>Negative Impact</u>
1.	Creating a Learning Community	√		
2.	Creating Safe Communities	√		
3.	Jobs and Prosperity	√		
4.	Improving Health and Well-Being	√		
5.	Environmental Sustainability		√	
6.	Creating Inclusive Communities	√		
7.	Improving the Quality of Council Services and Strengthening local Democracy	√		
8	Children and Young people	√		

## Financial Implications

	2006/ 2007 £	2007/ 2008 £	2008/ 2009 £	2009/ 2010 £
<b>CAPITAL EXPENDITURE</b>				
Gross Increase in Capital Expenditure				
Funded by:				
Sefton Capital Resources				
Specific Capital Resources				
<b>REVENUE IMPLICATIONS</b>				
Gross Increase in Revenue Expenditure				
Funded by:				
Sefton funded Resources				
Funded from External Resources				
Does the External Funding have an expiry date? Y/N			When?	
How will the service be funded post expiry?				

There are financial implications, in the short term, as a result of this report however those should be met by the forecasted savings in the medium to long term.

Projected Financial Implications:-

Year 1: £375,000  
 Year 2: £430,000  
 Year 3: £485,000

**Please Note that the above figures do not include costs associated with recommendations 3, 4, 6 and 13.**

The Working Group have established from it's findings that a potential saving per child is expected – this detailed information is in Appendix 5, a summary is shown below:-

Year 1: Assuming that 10% of children currently fostered with agencies were to be fostered in-house saving of £171,231  
 Year 2: Assuming that 20% of children currently fostered with agencies were to be fostered in-house saving of £356,731  
 Year 3: Assuming that 30% of children currently fostered with agencies were to be fostered in-house saving of £527,961

### **Departments consulted in the preparation of this Report**

Children's Services, Finance, Human Resources and Legal.

### **List of Background Papers relied upon in the preparation of this Report**

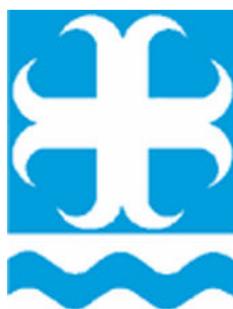
None

**SEFTON M.B.C.**



**SEFTON COUNCIL**

**OVERVIEW AND SCRUTINY COMMITTEE  
(Children's Services)**



**Fostering Service Working Group**

**FINAL REPORT**



## Foreword

When we started this review I don't think any of us envisaged the amount of time, or length of time, it would take. I am very grateful to the Working Group for the incredible amount of hard work they have put in and their keenness to see the job done. The issues at times were quite worrying as the information was revealed and the sensitivity and complexity of the task became apparent.

I understand that the recommendations we are making will cost the Authority increased expenditure in the short term but the Working Group are convinced in the long term savings will be achieved. In the last three years we have estimated that nearly £3M growth has been invested in Children's Services, most of which has gone into fostering or relevant departments. We believe our recommendations, once implemented, should reduce this year on year.

Many Officers gave their time to help the review. Whilst interviewing Officers and Foster Carers the Commitment and professionalism shone through and I would like to thank all Officers and Foster Carers on behalf of the Working Group for all their hard work in carrying out what can be an emotionally challenging job at times. I also wish to express my thanks for the efforts of the Assistant Director, Margaret Loughlin who was very helpful.

Finally a special word of thanks to our Support Officer, Ruth Harrison, who has worked very hard over and above the call of duty to enable us to do this review. I wish to personally thank all officers and witnesses who have contributed to our report, it really is most appreciated.



Councillor Richard Hands  
Lead Member – Fostering Service Working Group  
April 2009



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## **1.0 INTRODUCTION - FOSTERING SERVICE REVIEW**

The Overview and Scrutiny Committee (Children's Services) met on the afternoon of the 3 June 2008 where a Work Programme Session was facilitated. The purpose of the session was to invite all sections of the Children's Services directorate and their partners to share with the Committee issues that they felt required further investigation. The session went well and it was identified that after a poor Ofsted inspection the Overview and Scrutiny Committee should investigate the work of the Fostering Service. Minute No. 7 of the meeting held on 10 June 2008, resolved that a new Working Group be appointed as follows.

### **1.1 Membership**

Councillors R. Hands (Lead Member), S. Bradshaw, Glover and Hough and Mrs S. Roberts (Parent Governor Representative).

Further to Minute No. 20 of the meeting held on 19 August 2008 the Membership was amended as follows:-

Councillors R. Hands (Lead Member), S. Bradshaw, Doran and Hough and Mrs S. Roberts (Parent Governor Representative).

### **1.2 Terms of Reference and Objectives**

The objective of the review is to make recommendations to Cabinet on:

1. The recruitment and retention of Foster Carers in Sefton in order to lead to improvements in the Fostering Service provided to children and young people in Sefton.
2. The recruitment and retention of staff in Children's Social Care.

The Working Group will investigate the recruitment and retention of Foster Carers in Sefton in order to lead to improvements in the Fostering Service provided to children and young people in Sefton and will investigate the following:-

- a) A review of current recruitment of Foster Carers, compare methods used in Sefton with those in other local authorities to establish models of good practice.
- b) A review of payments to Foster Carers in Sefton compared to those made by other local authorities and independent fostering agencies.
- c) A review of Foster Carers deregistered in Sefton during the last 12 months and the reasons for this.
- d) To explore, through SWOT (Strengths, Weaknesses, Opportunities and Threats) analysis and interviewing appropriate Officers, the advantages and disadvantages of out-sourcing the service.

- e) To examine the Children's Services budget lines including the budgetary figures.
- f) To explore the reasons why there is a shortage of foster carers for babies.
- g) To examine the procedures and methods for advertising vacancies.

The Working Group will investigate the recruitment and retention of staff in Children's Social Care by investigating the following:-

- a) A review of:-
  - (i) current staffing levels;
  - (ii) number of vacancies;
  - (iii) use of agency staff; and
  - (iv) turnover of staff at various levels in Children's Social Care.
- b) A review of current staff recruitment methods to identify good practice approaches.

### 1.3 Meetings / Site Visits

The following Meetings have taken place:-

2 July 2008	Working Group Meeting	Bootle
18 July 2008	Working Group Meeting	Bootle
20 August 2008	Working Group Meeting	Bootle
10 September 2008	Working Group Meeting	Bootle
17 September 2008	Interviewed Representative – National Fostering Agency	Bootle
17 September 2008	Interviewed Group of Foster Carers	Bootle
24 September 2008	Working Group Meeting	Bootle
2 October 2008	Working Group Meeting	Bootle
17 October 2008	Interviewed Foster Carer	At their home (as requested)
21 October 2008	Working Group Meeting	Bootle
22 October 2008	Interviewed Foster Carer	At their home (as requested)
18 November 2008	Working Group Meeting	Bootle
23 January 2009	Interviewed Chair of Fostering Panel	Bootle
23 January 2009	Interviewed Witnesses – Ellesmere House	Bootle
23 January 2009	Interviewed Sefton Advocacy	Bootle

3 February 2009	Interviewed Representative – National Fostering Agency	Southport
3 February 2009	Interviewed Social Workers	Southport

## 2.0 BACKGROUND

2.1 The first meeting was arranged to meet with the Assistant Director, Children's Services and to scope the review. The Scoping Document is attached as Appendix 1. You will see from the scoping document that the Working Groups brief was a very complex and sensitive subject area.

2.2 Once the scope of the review had been identified Members requested further information in relation to the following:-

- The Ofsted Inspection Report and the Councils response to that Report.
- Statistics on the numbers of children fostered and the number of foster carers.
- Presentation in relation to how a child becomes fostered.
- Report on staff structure vacancies, agency staff.
- Report on Turnover of staff.
- Presentation on the Breakdown of the Children's Social Care Budget.
- Report on current and planned recruitment activity.
- Benchmarking exercise with regional authorities and Independent Fostering Agencies (IFAs) in relation to Fostering allowances.
- Good practice examples in relation to recruitment and retention of foster carers.

All the above information is available upon request – details at paragraph 8.

2.3 Members of the Working Group have been very busy in building their own knowledge base up of the Fostering Service, you can see from paragraph 2.2 above that this has been done through various approaches from reading material to receiving presentations with question and answer sessions following on.

2.4 Once Members felt comfortable with the information they had gathered they requested to interview witnesses. We wrote to all Seftons Foster Carers requesting expressions of interest of which we received a very good response. We held a meeting where a large number of Foster Carers attended, they had come to the meeting prepared and had the following issues they wanted to raise with the Working Group:-

- Communication
- Staffing
- Private Sector
- Respite/Support
- Training
- Complaints
- Allegations

These issues are considered in more detail later on in the report. The meeting was received well and the Overview and Scrutiny Officer was the main point of contact for the Foster Carers for the purposes of the review.

2.5 Paragraph 1.3 illustrates details of site visits. Working Group Members visited Foster Carers at their homes (at the request of the Foster Carer) the Overview and Scrutiny Officer also attended those visits. Members were very keen throughout the review to include as many Foster Carers and took steps to encourage that.

2.6 Members have also interviewed an expert witness from the National Fostering Agency. She was able to draw on her experiences of working for Local Authorities as a Social Worker and also for the private sector. This is examined in more detail later in the report.

2.7 The Working Group also wrote to all Social Workers employed by the Council, via the Assistant Director, Children's Services and the Trade Union, Unison requesting expressions of interest. Paragraph 1.3 shows that Members interviewed those Members of Staff as a group on Tuesday 3 February 2009.

2.8 The Working Group has carried out some excellent work during the life of the review and improvements to the service have been introduced throughout. The issues being reviewed were very complex and sensitive one which required thorough examination. The following paragraphs will convey the Working Groups findings along with recommendations and the reasons for those recommendations with safeguarding children being at the heart of the whole process.

### **3.0 HOW A CHILD BECOMES FOSTERED**

- 3.1 For the purpose of this report and those reading it Working Group Members felt that the reader should have some background knowledge of how a child becomes fostered. What follows are details the Working Group Members have been presented with throughout the review. The following are broad outlines of the process and not meant as definitive lists.

#### **REFERRALS**

A referral could come from a number of sources:

- Schools
- Youth Service
- Health (including GP's, hospitals, Child and Mental Health Services, School Nurses or Health Visitors)
- Parents/Family Members
- Friends/Neighbours
- Probation or Police
- Voluntary Agencies
- Adult Services
- Substance Misuse or Mental Health Services

#### **INVESTIGATION**

The concerns may consist of:

- Injury or harm to the child
- Neglect
- Child is abandoned or left unsupervised
- Concerns re parental drug and/or alcohol use
- Parent's involvement in criminal activity
- Parents have mental health issues or a learning difficulty
- Allegations of sexual abuse
- Family breakdown or dysfunction
- Parents struggle to manage child's behaviour/children are out of parental control
- Historical concerns about older children who were removed following court proceedings

## **ASSESSMENT**

- Initial Assessments will be completed within 7 working days – outcomes-
  - no further action,
  - support services being offered, or
  - further assessment being required
- Core Assessments will be completed within 35 working days
- Section 47 Investigation is specific to allegations of abuse or neglect and can be combined with a core assessment

## **OUTCOME OF ASSESSMENT**

- No further action
- Support Services to be offered either via universal services, targeted services or by social care
- Family Support agreement to be drawn up
- Concerns warrant formal conference under child protection procedures
- Concerns are so significant that consideration given to the child being removed from the family
- If voluntary services were provided these would be reviewed to ensure concerns had been addressed
- If concerns continue or escalate then a formal child protection conference or care proceedings could follow

## **THE CHILD BECOMES LOOKED AFTER**

This could be:

- By arrangement with birth parents (or those with parental responsibility)
- In an emergency by applying for an appropriate order
- By issuing an application for a Care Order in the local Family Proceedings court

## **OPTIONS FOR CARE**

- Local Authority Foster Care Placement
- External Provider (Agency Foster Carers)
- Residential Placement

## **FOSTER PLACEMENT – THE PROCESS**

The child's Social Worker contacts Family Placement with:

- Details of the child
- Reason for care
- An assessment of their needs and
- The likely time they would need to be cared for

Family Placement will check available carers and assess whether or not there is a match in terms of:

- Age
- Gender
- Geography
- Siblings being placed together or separately
- Any health or educational needs &
- Contact arrangements with birth Family Members
- What the child's needs are
- How the proposed carers can meet these needs
- The plan for introductions to the placement

If an in-house placement is not available then a Senior Manager will need to agree that independent providers are approached.

### **RELATIVE/FRIEND CARERS**

- The Local Authority has a duty to consider family members or friends as possible placements for children wherever feasible
- A child can be placed with a family member/friend on an emergency basis (Regulation 38) and in these instances the family member should be assessed within six weeks
- Family and Friend carers have to meet the same fostering standards as other foster carers
- They receive the same training and support and the same financial remuneration.

3.2 After reading the details of how a child would become fostered I think you will agree that the Working Group have been investigating a very sensitive and important service provided by the Council. Whilst reading what follows bear in mind that this is emotionally challenging work for all involved, the Council as Corporate Parent, Social Workers, Foster Carers and all other bodies/agencies associated with the Fostering Service.

## 4.0 FINDINGS/EVIDENCE

4.1 As referred to in paragraph 2.4 above, after interviewing Foster Carers, as a group on 17 September 2008, it was clear that there were 8 ((a) – (h)) recurrent areas of concern shared between Carers. Foster Carers expressed the following concerns both written and verbal and what follows is a summary of those concerns:-

### (a) Communication

Communication appeared “poor” across both teams (The Family Placement Team and Children’s Social Worker Team) and foster carers. Carers felt that the service would benefit from more openness and that there should be mutual respect.

Foster Carers want to be treated equally with regard to information, finance and equipment. (Foster Carers felt that there was a different level of knowledge between Social Workers with regards what Foster Carers were entitled to).

It was deemed that policy changes were not conveyed to everyone and are applied inconsistently (for example family members helping with care for more than 24 hours should be assessed as foster carers).

Different funds for use by Foster Carers are held in different departments with different criteria for access. This causes difficulties when trying to claim expenses back and often results in delays.

Foster Carers reported incidents of informally passing on to some carers and not others, important information, leads to a culture of ambiguity. Important information such as changes in procedure, become the subject of “hearsay” where no one has a clear understanding of the facts.

(An example of confusion given was the concept of children sharing a room or is it one child/room).

It was felt that written policies for all special allowances should be available to Foster Carers, with written clarification when a child is placed with a carer and that such policies should be enforced corporately so that advice doesn’t differ from Social Worker to Social Worker. Carers had experienced difficulties with verbal agreements for clothing/equipment allowance only to be told at a later date that the money spent by Carers couldn’t be reimbursed.

Members of the Working Group believe that the various recommendations cross-referenced will help to address the lack of communication and openness that Foster Carers have spoke of. **(If agreed, recommendations 9 and 11 should address the issue)**

(b) Staffing

Foster Carers raised the issue of the high turnover of staff and constant changes to staff for both carers and children they believed that to have a detrimental effect on all concerned. Evidence received illustrated some children had received up to 6 different social workers in twelve months, another 14 in two years and four in twelve months. It was felt that the number of Agency staff (whilst very competent workers) employed was a concern, particularly when they can leave post with one week's notice.

**(If agreed, recommendations 7, 13 and 14 should address this issue and identify ways in which more permanent staff may be employed and retained rather than Agency personnel, it is envisaged that this will be a short term expense for a long term saving on Agency costs).**

(c) Agency

The Council have to pay a significant premium for Agency Foster carers compared with the same services that are provided within the Authority. Children who are placed with Agency Foster Carers seem to receive greater benefits compared with their authority counterparts for example appropriate therapy, regular activities during holiday periods, increased professional support for children and carers when required. One case study given as an example was two siblings, one placed with the Council's Foster Carer and another placed with the Council's Agency Foster Carer. When they both met up for the afternoon the Agency placed child had lots of toys, been on a holiday abroad and had new clothes and shoes. The other looked after child had none of this. This caused friction between the two children.

The Working Group found that Sefton uses many Agencies and the cost to the Authority is extremely high. The largest provider which Sefton uses is the National Fostering Agency (NFA), therefore the Working Group felt that it should explore a preferential partnership or outsourcing which should reduce costs, see paragraph 4.3. **(Recommendation 5)**

(d) Respite/Support

Foster Carers felt that this aspect of the system varied greatly throughout Sefton and was dependant upon the ability and commitment of the individual Social Worker allocated to the Foster Carer. Foster Carers felt that there was insufficient support when unforeseen circumstances arise such as the need to attend personal hospital appointments, family bereavement/funeral and appointments of other family members. It was found that when respite was required on a short term basis it wasn't forthcoming. Members of the Working Group listened to evidence that such issues were resolved by removing the Foster Child from the Foster Carer indefinitely causing distress to both Foster Child and Carer. **(If agreed, recommendation 4 will address this issue).**

(e) Training

It has been recognised that training given to Foster Carers has improved significantly over the past few years with real benefits for carers and children. New standards are being introduced with the “Ordinary People Doing Extraordinary Things” and it was agreed that this can only be good in the long term. However Foster Carers felt that what new demands ie paper work, placed an extra burden upon already hard pressed carers who see themselves asked to take on a more professional role without the associated recognition. **(If agreed, recommendations 1, 2 and 3 will address this issue).**

(f) Complaints

Foster Carers felt that their complaints weren't always dealt with appropriately. One case study given was in relation to a Foster Carer being given approval for a loft conversion to accommodate a child. The work was instructed by Social Services who paid the builder as work began, it became apparent that the standard of building work was poor, the roof leaks and the loft conversion has now been condemned as uninhabitable. As a result of this poor work, the Foster Carer can no longer act as a Foster Carer as placements are on “hold” owing to “inadequate housing”. **(If agree, recommendations 10 and 11 will prevent such issues occurring in the future).**

Other examples given were in relation to the response times of letters of complaint and Foster Carers waiting up to six months with one Carer waiting nine months. Members of the Working Group felt that this was unacceptable and have been assured that this has been much improved.

(g) Allegations against Foster Carers

Allegations made against a Foster Carer is a very serious issue which should be dealt with as quickly as possible and treated in a sensitive manner. Foster Carers felt that written information was not sent out about the procedure with no reports being provided from meetings or panels. Delays occur without reason. Foster Carers reported that correspondence was not provided following the conclusion of an allegation. Some Working Group Members visited a Foster Carer who had shared information about an alleged allegation. The Foster Carer shared information with Members which led to grave concerns about the current system. It became apparent when interviewing Foster Carers that the Social Worker allocated to the Foster Carer can also be the investigating officer of a complaint made against them, with that same officer making recommendations to the Fostering Panel for the final decision on de-registration. Members felt that allegations should be investigated independently and that there should be an advocacy service available to Foster Carers **(hence recommendation 5).**

(h) Insurance

The Working Group were concerned to hear that Foster Carers were expected to arrange their own insurance cover while Fostering. This means that they are expected to use the allowance money they receive for the child(ren) to pay for that insurance. The Working Group found that no help was given or offered by the Authority. In view of the fact that the Fostering Network believes "That no Foster Carer should be out of pocket as a result of Fostering" the Working Group felt **recommendation 3 to be fair.**

## 4.2 RETAIN AND RECRUIT FOSTER CARERS

### 4.2.1 As part of the review Members have investigated why Sefton Council are finding it difficult to retain and recruit Foster Carers.

Payment to Foster Carers at Sefton is lower than that of neighbouring Authorities, Members examined this in more detail by looking at information shared from the Fostering Network "Survey of Allowances and Fee Payment Schemes 2007-08 and Recommended Minimum Allowances 2007-08". After examining the document Members of the Working Group found that there was no "standard" allowance that foster families receive for the children and young people they look after. The amount varies widely, sometimes within the same authority depending on a variety of factors including the age of the child, the child's needs and their level of independence. Taking that into account Members of the Working Group concluded and agreed with the Fostering Network in their belief that "No Foster Carer should be out of pocket as a result of Fostering". The Fostering Network recommended payment for 2007-08 is attached as Appendix 3)

### 4.2.2 Members of the Working Group strongly believe that if Sefton Council were to:-

- (i) increase its weekly payment to Foster Carers by 30%,
- (ii) pay them a retention fee of £50 per week for a maximum of 12 weeks when they are without placement; and
- (iii) pay for their insurance in terms of their professional capacity

the Council would be more successful in recruiting and retaining existing Foster Carers (who could otherwise go to Agency Organisation where they are paid more and the children receive greater benefits). Members believe that this in turn would alleviate the requirement to pay the Agencies considerably higher rates than in-house costs, which would give the Council a long term saving and so therefore believe **recommendations 1, 2 and 3 to be fair and result in a long term saving.**

#### 4.2.3 Sefton Foster Carers

The Working Group Members believe that if we invest in our own Foster Carers (Council employed) by increasing the payment then we should retain more of our own Foster Carers and also recruitment should increase because the benefits are more attractive. **(If agreed, recommendations 1, 2, 3 and 4 will go some way in addressing the inconsistencies between Council placed looked after children and Agency placed looked after children).**

- 4.2.4 Members of the Working Group also examined marketing and felt that the Council should undertake some professional marketing if they are to compete for the best Foster Carers in the area. Members were disappointed to find a clear lack of adverts compared to that of Liverpool City Council who are advertising on trains, buses, in the press and local radio stations covering the Sefton area. Stockport have been marketing on national television and with that in mind Members have recommended that the Children's Services Department develop a marketing strategy with Sefton's Communications Department. **(If agreed, recommendation 15 will assist in addressing this issue).**

## 4.2 PREFERENTIAL PARTNERSHIP

- 4.3.1 The Working Group Members examined the possibility of entering into a preferential partnership agreement with the National Fostering Agency (NFA) which they believe would also alleviate the disproportionate rates paid to Agencies.
- 4.3.2 Members interviewed the Regional Manager for the North West and found that the NFA is already a specialist contractor to the Council, it is a long established, independent fostering provider with national coverage and a dedicated and specialist infrastructure supporting its regional team structure. As a key contractor to Sefton MBC, the NFA has a clear understanding and knowledge of the existing services provided by the authority and currently provides nearly a quarter of all Sefton's independent fostering placements. Management and operational relationships with the Contracts, Family Placement and Child Care teams are robust and based on mutual respect and professional understanding.

- 4.3.3 Members also learnt that the NFA has established strong working relationship with all Merseyside Local Authorities and Sefton MBC initially led an accreditation model with placement North West formally Greater Merseyside and Cheshire Consortium. NFA are currently participants with Placements Northwest and the NFA has received a “Good” score after submitting a report to Panel. It was reported that they were able to evidence a 97.8% stability rate for children and young people in the North West with a commitment to demonstrating that children achieved positive outcomes, in line with Every Child Matters.
- 4.3.4 Working Group Members explored a preferential partnership with NFA and have received a summary from the NFA which outlines a core framework of principles of operation, together with a list of actions that would have to be completed in order to identify potential costs and benefits. Members understand that this would need to be subject to joint discussion to establish contractual terms and agreed Service Levels. At this stage the information received can not be shared as it is strictly confidential. It was very important to Members of the Working Group that the Final Report was open to the public so Members are requesting that the issue of a Preferential partnership with the NFA be looked into further as a confidential issue. **Recommendation 5**.
- 4.3.5 Outsourcing – The Working Group interviewed the past Assistant Chief Executive (Strategy) and discussed at length the route of outsourcing. Although the Council has outsourced some departments the Working Group felt that in this case outsourcing would not achieve significant savings. The Foster Carers were unhappy with the idea along with Social Workers who expressed their concerns. The Group made strenuous efforts to get information from Telford and Wreakin Council in relation to their outsourcing but were unable to either arrange a visit or glean information due to confidentiality rules. The issue of outsourcing may need to be revisited in the long term but Members of the Working Group felt that in the short term **recommendation 6** would be the best way forward.

#### **4.4 SEFTON ADVOCACY**

- 4.4.1 Members of the Working Group were concerned to find that an advocacy service wasn't made available to Foster Carers who had allegations made against them. Foster Carers were expected to co-ordinate an advocate themselves. Members strongly believe that such a service is required. Due to confidentiality Working Group Members can not share evidence received of this nature however the statistics of complaints against Foster Carers does illustrate the need for such a service. Members of the Working Group strongly believe that the Council should have some safeguards in place for its' Foster Carers.

4.4.2 Members of the Working Group interviewed representatives from Sefton Advocacy to determine if they would be willing to provide that service for the Council and associated costs with providing it. Sefton Advocacy service have sent a forecast of financial costs associated with providing an advocate service to Foster Carers and Members of the Working Group would like this to be investigated further and negotiate the terms of an Agreement. (This information is confidential and can not be disclosed on a public document). **(If agreed, recommendation 6 will address this issue).**

#### **4.5 RETAIN AND RECRUIT STAFF IN CHILDREN'S SERVICES SOCIAL CARE**

4.5.1 Members interviewed Social Workers as a group and also visited them at their work place (Ellesmere House, Crosby). It became apparent almost immediately that recruitment to Social Worker posts was difficult. This is a National problem which has increased, the National average of vacancies in Social Worker posts is 9%, Sefton is currently at 16%.

(a) As at 20.10.08 Sefton had 5 agency staff in team manager or assistant team manager posts (out of 21 posts) and 11.5 agency social workers out of 69.5 posts. When interviewing the Assistant Director in the early part of the review she gave us the current vacancies even with Agency staff the Authority was one team manager post and 2 social work posts not covered.

(b) Sefton has already taken a number of steps to address the issue of recruitment and retention:

(c) Seconded post of Resource Manager to lead on recruitment and retention in Social Care

(d) Work with Jacaranda Recruitment Agency to recruit German Social workers. These interviews resulted in two candidates being offered posts. Further interviews for Social Workers have taken place that should also result in 6 candidates being offered posts.

4.5.2 Trainee Social Worker Posts - Members investigated the idea of recruiting Trainee Social Worker posts from local university's as a way of addressing the recruitment and retention issues Sefton are currently experiencing. Members believe that the Council would benefit from setting up such an agreement with the University and have requested that the Council consider recruiting three Trainee posts per year, this to be continued until all vacant posts are filled. The cost would be approximately £55,000/year for 3 posts. (Appendix 4 sets out the costs associated with the proposed establishment of trainee Social Worker posts). **(Recommendation 7).**

- 4.5.3 Members were also alarmed to be informed that as a result of vacancies in Sefton's Children's Services Social Care, that the Social Care staff that were in post were picking up those additional cases thus resulting in those Members of staff managing an approximate case load of 25, the national average is said to be between 12 and 16 cases. Members felt that this was causing a substantial amount of stress on an already over stretched service. This became more apparent when Members arranged to interview witnesses who provide this service.

Whilst interviewing the Social Workers and Support Workers their passion and commitment for their job was evident. Members were delighted and found it refreshing to interview a team who felt so strongly for the Foster Carers and Children that they would go the extra mile to get the job done. They spoke of a team spirit that was strong and when asked why they hadn't gone to work for Agency because they pay more with more benefits "because we like the team" was the answer. However it was recorded that they have an increasing case load which includes home visits, attending Looked After Children reviews, panel meetings, preparation meetings, writing up reports, completing documentation and arranging toddler groups, older children groups and whatever may be requested or required. They maybe required to attend "out of Borough visits" to Foster Children whom the Authority are responsible for but are placed with a family/relative member who lives outside the borough. It was highlighted that there seemed to be a high turnover in Children's Social Worker posts which they stated was "sad" and they felt that it needed to be recognised that children needed stability and continuity in order for them to move forward. One Social Worker told the Working Group that they had been handed 16 cases on their first day.

**(Members would like to see this addressed as a matter of urgency hence recommendations 13 and 14).**

#### **4.6 Other Issues**

- 4.6.1 There is no doubt that this review has resulted in much public interest so much so that individual Members were approached by Foster Carers in the hope that personal issues maybe resolved. Members received telephone calls, letters and e-mails about many issues including outstanding accommodation issues and aids and adaptations made to properties. The Working Group are not at liberty to share personal details however they realised quite quickly that a protocol was required to address such issues. Urgent issues raised were referred immediately to the relevant Officers and in most cases the issue was resolved but in some cases the issue is still ongoing. **(Recommendations 10 and 11 will improve that part of the service and safeguard Social Workers and Foster Carers who are not qualified to authorise, make decisions and supervise aids and adaptations to properties).**

- 4.6.2 Members of the Working Group interviewed the Chair of the Fostering Panel who clarified the role of that panel. The Chair of the panel acknowledged that there was a problem of Agency staff and stated that in his professional opinion Foster Carers required more support and that there needed to be more communication between Foster Carers, Social Workers, the Fostering Panel and management. **(If agreed, recommendation 12 will address this).**

The Chair referred to the standard of reports coming before the panel as being “poor” but were improving, that the panel wait too long for new applications to reach panel and the reports on allegations were often missing information. The Chair believes that Sefton is losing Foster Carers at recruitment stage because they leave and go on to an agency where they are paid more and receive more benefits. The Chair referred to Cheshire as having a rigorous structure, an incremental payment structure linked to training and professional ability. The Chair of the panel also referred to judgements made by the courts whereby an order will specify that the grandparents should look after the Child(ren). The Chair stated that this is a challenge for them because the grandparents then are required to become Foster Carers and sometimes they don’t have the professional ability or training that is required. The Working Group agreed with these points and felt that they should be referred to the proposed support group for discussion, and the results be sent to the Cabinet Member Children’s Services. **(Recommendation 12(a))**

- 4.6.3 Budget Headings – When interviewing various Financial Officers of the Council it became apparent that the budget for Foster Carers, Social Workers, aids and adaptations, equipment and other relevant costs were shown or placed in various sub headings of the overall Children’s Services budget. The Working Group and all those involved found this to be very confusing, so to enable managers and the management to work diligently with the budget it was agreed that an overhaul of budget headings should be carried out. **(Recommendation 8 should make future analysis of budget spend easier).**

## 5.0 Conclusion

The Working Group at first felt that Ofsted were harsh on the Authority, in their award of “Inadequate”, but after a few weeks it became apparent that Members felt that the Service had “got off lightly”. Members of the Working Group do believe that the time has come to stop providing such an important service on the “cheap” and believe that the recommendations (although causing increased expenditure in the short term) should provide significant savings and much improved services in the long term for Sefton’s Looked After Children and Foster Carers.

While the Working Group were investigating Fostering, the Department were making improvements and the Working Group would like to express its congratulations for the hard work which has already been done. Since the report was written Ofsted re-inspected the service as “satisfactory”, this is a huge credit to all the hard work of staff working in the service.

## **6.0 Acknowledgements**

- 6.1 The Working Group is grateful to all those witnesses and other persons who have assisted with research, provided and shared information and given up time to attend interviews.
- 6.2 The Overview and Scrutiny Officer will circulate the Final report to all witnesses who have taken part in the review.
- 6.3 Finally the Working Group would like to take this opportunity to thank the Foster Carers and Social Workers who do an amazing job and are a vital part of our society.

## **7.0 Recommendations**

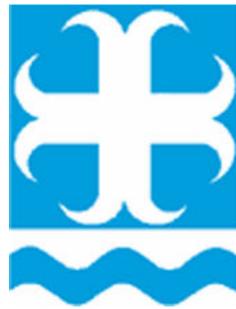
- (1) That Foster Carers weekly payment be increased by 30% immediately, over the standard inflation rate;
- (2) That Foster Carers be paid a retention fee of £50/week for a maximum of 12 weeks when they are without placement;
- (3) That further investigations be carried out to examine the costs associated with the Local Authority paying for each Foster Carer to be insured in their professional capacity;
- (4) That the Strategic Director Children's Services be requested to investigate the level of need for respite care for Foster Carers and how this might be met and the findings being reported back to the Overview and Scrutiny Committee (Children's Services);
- (5) That the Council explores entering into a preferential partnership agreement with a suitable provider;
- (6) That an Advocacy service be established for Foster Carers;
- (7) That 3 Trainee Social Worker posts be funded, per year, in suitable local university's to help with recruitment and retention, this to be continued until no longer required;
- (8) That a complete overhaul of the budget headings for the Fostering Service be agreed in order that the Cabinet Member Children's Services and Overview and Scrutiny Committee (Children's Services) can identify easily where and how the budget is spent;
- (9) That a handbook illustrating equipment available to Foster Carers be designed and a corporate approach enforced;
- (10) That a protocol be introduced to address accommodation issues ensuring that a suitable dialogue takes place between One Vision Housing and any other Social Landlord, Relevant Foster Carer and Management occur;
- (11) That a protocol be introduced to address co-ordination and payment of aids and adaptations where they are necessary to potential Foster Carers homes ensuring the Local Authority commission, co-ordinate and finance any project;

- (12) That a Foster Carer Support Group be set up and co-ordinated by the Authority to meet quarterly with appropriate representation from the Authority and the Fostering Panel;
  - (a) that the above group reports any recommendations be sent direct to the Cabinet Member Children's Services and for information to Overview and Scrutiny (Children's Services)
- (13) That the relevant department, Corporate Personnel be requested to investigate increasing the salaries of the Councils Social Workers, thus reducing the number of agency staff. The findings of the investigation be reported to the Overview and Scrutiny Committee (Children's Services) for approval;
- (14) That the relevant department be requested to investigate reducing the case load of the Councils Social Workers. The findings of the investigation be reported to the Overview and Scrutiny Committee (Children's Services) for approval;
- (15) That the relevant department be requested to introduce a Marketing Strategy for Recruitment and Retention of Foster Carers with an appropriate budget attached to it;
- (16) That the Strategic Director Children's Services be requested to submit reports twice per year to Overview and Scrutiny Committee (Children's Services) updating members on progress with agreed recommendations;
- (17) That the Cabinet Member Children's Services and Cabinet be requested to report back to the Overview and Scrutiny Committee (Children's Services) on the contents of the Final Report of the Fostering Service Working Group; and
- (18) That the Overview and Scrutiny Officer and the Assistant Director be requested to send the Final Report of the Fostering Service Working Group to all of Sefton's Foster Carers.

## **8.0 Supporting Information**

- 1.7.1 During the process of this review, the Working Group has gathered a substantial amount of information and data, which will be invaluable in helping it to form its conclusions and recommendations.
- 1.7.2 Any background information that has been gathered so far is available on request from Ruth Harrison, Scrutiny Support Officer (telephone 0151 934 2042 e-mail: [ruth.harrison@legal.sefton.gov.uk](mailto:ruth.harrison@legal.sefton.gov.uk))

# SEFTON COUNCIL



## SCOPING EXERCISE

### FOSTERING SERVICE WORKING GROUP

## **MEMBERSHIP**

Councillors R. Hands (Lead Member), S. Bradshaw, Glover and Hough and Mrs S. Roberts (Parent Governor Representative).

Further to Minute No. 20 of the meeting held on 19 August 2008 the Membership was amended as follows:-

Councillors R. Hands (Lead Member), S. Bradshaw, Doran and Hough and Mrs S. Roberts (Parent Governor Representative).

### **Extract:**

Scrutiny and Review Committee (Children's Services) Meeting of 10 June 2008.

RESOLVED: That

The Committee establishes a Working Group to review the fostering service with particular reference to recruitment and retention of Council Staff with the following Members nominated to serve:

Councillors Hands (Lead Member), Bradshaw, Glover and Hough; and  
Mrs S. Roberts

## TERMS OF REFERENCE AND OBJECTIVES

The objective of the review is to make recommendations to Cabinet on:

1. The recruitment and retention of Foster Carers in Sefton in order to lead to improvements in the Fostering Service provided to children and young people in Sefton.
2. The recruitment and retention of staff in Children's Social Care.

This will be done by:-

- 1
  - a) A review of current recruitment of Foster Carers, compare methods used in Sefton with those in other local authorities to establish models of good practice.
  - b) A review of payments to Foster Carers in Sefton compared to those made by other local authorities and independent fostering agencies.
  - c) A review of Foster Carers deregistered in Sefton during the last 12 months and the reasons for this.
  - d) To explore, through SWOT analysis and interviewing appropriate Officers, the advantages and disadvantages of out-sourcing the service.
  - e) To examine the Children's Services budget lines including the budgetary figures.
  - f) To explore the reasons why there is a shortage of fostering carers for babies.
  - g) To examine the procedures and methods for advertising vacancies.
- 2
  - a) A review of current staffing levels, number of vacancies, use of agency staff, turnover of staff at various levels in Children's Social Care.
  - b) A review of current staff recruitment methods to identify good practice approaches.

## METHODS OF ENQUIRY

To receive background information in relation to:-

- Ofsted Report on Fostering Service (March 2008) and subsequent action plans
- Numbers of children fostered and foster carers
- How a child becomes fostered
- Current staff structures, numbers of vacancies and use of agency staff, turnover of staff
- Examination of Children's Social Care budget
- Information on current and planned recruitment activity

The Working Group will write to foster carers and former foster carers alerting them to the review and requesting comments, this may include a public meeting. Site visits will be made to Social Care offices. Meetings will be held via video link with relevant national bodies.

A presentation will be made on the Children's Social Care budget.

**T**

**Lead Officer:** Margaret Loughlin

**Overview and Scrutiny Officer:** Ruth Harrison

### OTHERS WHO WILL BE INVOLVED

• Fostering Improvement Board	Derek Jones & Jean Massam
• Ken black, Assistant Director – Social Care	
• Steve Sheridan	outsourcing
• Foster Carers	Public Meeting
• Council Staff	Meeting
• Michael Evans	Financial Info
• Nick Cabonara	Financial Info
• Phil Cunningham	
• Social Work Association	
• National Foster Care Association	Gill Guy-Edwards
• British Association of Adoption and Fostering	
• North West Employers Organisation	Report recently done
• Barnardos	

### ARRANGEMENTS FOR REPORTING TO CABINET/COUNCIL

- Report to Overview and Scrutiny Committee (Children's Services) 28 October 2008.
- Report to Cabinet 30 October 2008.

- **PLANNING CHART**

The Planning Chart is an example of the way reviews could/should be planned.

It is recommended that realistic time frames in which to carry out tasks should be considered including possible delays for public holidays and Council business. Effective planning suggests that more planning time be built into the chart.

Activity	July	Aug	Sept	Oct
Scoping				
Consider Docs				
Witnesses				
Site Visits				
Initial Findings				
Draft Report				
S&R Cttee				
Submit to Cabinet				

## Ten Step Process Flow Chart

Committee agrees Working Group membership and appoints Chair.

Working Group complete scoping document determining terms of reference & timetable.

Working Group submit scoping paperwork to Scrutiny Committee for approval.

Background research undertaken and evidence collected.

Working Group meet to determine questions they wish to ask witnesses.

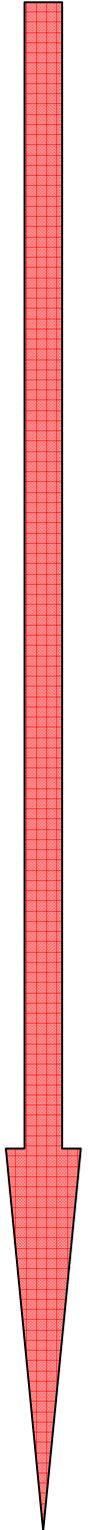
Working Group make any necessary visits & additional evidence obtained.

Witness hearings take place & responses written up by support officer.

Working Group review headings for the final report.

Working Group and support officer draft final recommendations and approve final report.

Scrutiny Committee receives final report and recommendations and how they should be taken forward.



**WITNESSES INTERVIEWED**

Foster Carers

National Fostering Agency

Social Workers – Family Placement Team

Chair – Fostering Panel

Sefton Advocacy

Social Workers

Support Workers

Assistant Director

Children's Services Group Accountant

Local authority	Age range						Holiday	Birthday	Festival
	0-4	5-10	11-15	16+					
BLACBURN	£131.82	£131.97	£163.97	£212.40	2x WR	1x WR	1x WR	1x WR	
BLACKPOOL	£91.12	£104.10	£129.54	£165.27	£249.66-£452.84	1/2 WR	1/2 WR	1 WR	
BOLTON	£99.62-£76.23	£76.23	£89.44	£118.33	£200.00-£300.00	£90.00-£101.13	£118.00-£202.26	£118.00-£202.26	
BURY	£100-£102.00	£113.00	£129.00	£151.00	£200.00-£415.25	1/2 WR	1x WR	1x WR	
CHESTER	£94.28	£96.04	£119.96	£145.25	£210.70-£363.13	1x WR	1x WR	1x WR	
CUMBRIA	£106.40	£121.24	£150.92	£183.54	2x WR	1x WR	1x WR	1x WR	
HALTON	£114.53	£130.47	£162.42	£202.04	£168.75-£371.62	50% of WR	50% of WR	1x WR	
HODKESLEY	£118.60	£135.10	£168.18	£204.35	2x WR	1x WR	1x WR	1x WR	
LANCASHIRE	£91.53	£101.26	£125.98	£163.15	£224.20-£448.96	50% of WR	50% of WR	1x WR	
LIVERPOOL	£95.00	£105.00	£125.00	£150.00	£265.00-£450.00	1x WR	1x WR	1x WR	
MANCHESTER	£118.60	£135.10	£168.18	£204.35	2x WR	1x WR	1x WR	1x WR	
OLDHAM	£118.58	£135.10	£168.14	£204.54	2x WR	1x WR	1x WR	1x WR	
ROCHDALE	£114.87	£130.85	£162.89	£198.11	£161.84-£265.96	£29.43-£48.98	£38.88-£56.78	£38.88-£56.78	
SALFORD	£100.00-£102.00	£113.00	£129.00	£151.00	2x WR	1x WR	1x WR	1x WR	
SEFTON	£100.00-£102.00	£113.00	£129.00	£160.65	£163.20-£306.00	1x WR	2x WR	2x WR	
ST HELENS	£114.87	£130.85	£162.78	£198.11	2x WR	1x WR	1x WR	1x WR	
STOCKPORT	£117.32	£117.32-£128.52	£138.66-£151.06	£201.46	£158.78-£272.35	£23.33-£50.36	£38.88-£100.73	£38.88-£100.73	
TAMESIDE	£100.00-£102.00	£113.00	£129.00	£151.00	£275.00-£415.25	50% of WR	50% of WR	1x WR	
TIMPFORD	£100.00-£102.00	£113	£129.00	£151.00					
WARRINGTON	£118.60	£135.10	£168.18	£204.55	£217.30-£380.28	£49.20-£81.49	£50.46-£135.81	£50.46-£135.81	
WIGAN	£100.00-£102.00	£113.00	£129.00	£151.00					
WIRRAL	£79.52	£90.65	£112.84	£132.66	£159.04-£265.32				
<b>GRAND TOTAL</b>	<b>£116.80</b>	<b>£195.10</b>	<b>£168.16</b>	<b>£204.56</b>	<b>£204.56</b>	<b>2 x WR</b>	<b>1 x WR</b>	<b>1 x WR</b>	

The Footballing Network OCTOBER 2007

## PROPOSED ESTABLISHMENT OF TRAINEE SOCIAL WORKER POSTS

### Proposals

This note considers a proposal to create 6 full-time trainee social worker posts as a means of overcoming staffing shortages and recruitment difficulties in the Councils Children's Services Directorate.

It is proposed to designate the posts as Trainees Social Workers and establish them at SCP 4 (£11,961). The grade has been determined by carrying out a job evaluation exercise and this reflects the fact that they would be in a learning role and closely supervised in any workplace situation. They would be taken on to complete a three-year full-time degree in social work and at the end of this period it would be the intention to slot them into a vacant social work position. Work experience would be provided when the occupants were not at college.

Other authorities are being contacted to see if social work trainee schemes are operating in neighbouring councils.

### Analysis of Costs for Each Post

Salary@ SCP4	11,961
On Costs @ 23%	2,751
Course Fees etc.	3,500
<b>Total</b>	<b>18,212</b>

Total funding required is estimated at £110,000 per year for 6 posts. There is no provision in Children's Services budget for this sum. Personnel Department has submitted a bid to the Learning and Skills Council to extend the Council's apprenticeship programme. If this bid is successful it may be possible to incorporate this initiative within the programme and off-set some of the anticipated costs.

### Recruitment

Suitable applicants could be drawn from the school leavers population and would also be available to more mature students. The next intake for the full-time degree course is in September but it is understood that the college the Council uses (Liverpool Community College) is fully subscribed for this course so it may be necessary to look elsewhere.

**B J Marsh, Strategic Director, Children's Services**  
**M H Fogg, Personnel Director**

## FOSTER CARE Comparative Costs

### Cost of in-house provision

Based on the 2008/2009 Budget, the total estimated annual cost of providing Sefton's own Foster Carers is :	£3,195,000
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The estimated number of placements is:	131
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The average annual cost per placement is therefore:	£24,389
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This equates to an average cost per child per week of:	<b>£469</b>
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*These costs include not only the actual payments to the foster parents but also associated support, (eg. Social Worker time) and other overheads.*

*The actual payments made to each foster parent per child per week is just over £100.*

### Cost of Agency Provision

Based on the cost of current placements, the total estimated annual cost of paying external Foster Agencies is :	£4,755,000
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The estimated number of placements is:	123
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The average annual cost per placement is therefore:	£38,659
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This equates to an average cost per child per week of:	<b>£743</b>
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*These costs represent the total fostering package and therefore include Social worker support etc. as provided by the Agency.*

*The actual payments made to each foster parent per child per week will depend upon the individual agency, but may be in the region of 50% to 60% of the total paid by the Council. This would therefore equate to an payment of about £400 per week which would be nearly four times that paid by the Council.*

*Agency foster carers will generally be asked to accommodate children that are more difficult to manage.*

## **FOSTER CARE Indicative Cost Savings**

On average, placing a child with an agency is likely to cost the Authority about £275 per child per week more than if a child were to be with an in- house carer.

Each child would therefore cost approximately £14,300 more per year to place with an agency.

### **Based on current figures, and assuming that there were sufficient in-house foster carers to meet the demand for placements,**

the potential annual savings to the Council could be as follows:

	<u>In-house</u> £	<u>Agency</u> £	TOTAL £	Indicative Saving £
<b><i>Annual cost of current provision</i></b>	<b><i>3,195,000</i></b>	<b><i>4,755,000</i></b>	<b><i>7,950,000</i></b>	
Assume that 10% of children currently fostered with agencies were to be fostered in-house	3,487,672	4,291,098	7,778,769	171,231
Assume that 20% of children currently fostered with agencies were to be fostered in-house	3,804,733	3,788,537	7,593,269	356,731
Assume that 30% of children currently fostered with agencies were to be fostered in-house	4,097,405	3,324,634	7,422,039	527,961

Note that the savings shown above do not take into account additional costs arising from the recommendations elsewhere in the report