



Improving adoption, fostering and kinship services consultation

The Fostering Network's response

October 2025

As a membership body, The Fostering Network's views are shaped through our projects and programmes as well as our members' participation in advisory boards and forums. We have 2,852 foster carer members in Wales and all 22 local authorities and 9 IFAs are in membership.

Our response to this consultation is based on our 2024 State of the Nations' Spotlight Report on Wales¹, which contains data from respondents across the country on what works well in fostering and what needs to be changed. 276 foster carers and 11 fostering services completed this survey in Wales.

It also contains findings from a recent survey we conducted to gather views from members of The Fostering Network in Wales on the questions in the consultation on a register and transfer protocol which was completed by 21 foster carers and 4 fostering services. We also discussed the consultation questions in a focus group with 7 of our members. We have included the views from both surveys and focus groups as part of our response.

Assessment of kinship carers and support for kinship placements – proposed regulatory changes

Question 14: Do you agree that Part 2 of Schedule 1 to the Fostering Panels (Establishment and Functions) (Wales) Regulations 2018 should be replaced with a new Part 3 specifically for kinship foster carers?

We support the need for radical reform for children cared for by family members but consider that the proposed change for an additional section of the assessment will not achieve the reform hoped for as it will not address the real underlying issues.

¹The Fostering Network (2024) '[State of the Nations' Foster Care Spotlight on Wales Report](#)'

We would encourage exploration of alternative ways of securing permanency for children that remove the requirement for family members to be approved as foster carers and instead focus resources on supporting families to commit to children permanently outside of the care system.

Welsh Government is very aware that the longer-term outcomes for children in care are poorer than for children who grow up with safe and nurturing families and it is acknowledged that this is the motivation for these reforms. Kinship foster carers experience many adverse issues as they care for children with inconsistent support in place legally, practically and emotionally as well as children with mental health needs and many other factors. These issues continue to contribute towards poorer outcomes for these children.

The stringent fostering approval process prevents some family members from being able to provide homes to children they love. In addition, the timescales associated with assessments as a result of temporary approval are unrealistic and leave some children at risk of harm:

Some children under kinship arrangements are kept within the care system as their carers are reticent to apply for court orders that would take them out of care because they are concerned that they will not have the financial support or support with managing the complexities of the family time or contact arrangements.

Children in care experience being treated differently through the need for delegated authority decision making and social work intervention throughout and beyond childhood. The change proposed will keep children in this position as they will remain children in care.

Adding in a part 3 to the fostering assessment process does not go far enough to change outcomes for children and could add further complication to fostering assessments. We acknowledge the need for assessment to consider suitability for a particular child or children.

If more radical alternatives are not achievable, then amending the current Part 2 may be less confusing.

The later proposals in respect of legislating SGO support plans, would enable family members to provide care with effective support outside of the care system and without fostering assessment, approval, or continuous review.

If radical change is the objective of these regulatory changes then we would recommend that assessment of suitability to care for a connected child should be removed from the fostering regulations and replaced with alternatives such as:

- Improved SGO regulations
- New Interim SGO regulations to reflect short term/interim care arrangements for children with connected persons.

Question 15: Do you agree with the information to be included in the new proposed Part 3?

We advocate for the need for more radical thinking as stated above. However, taking this question in isolation, the specific needs of children who will be living with family members must

be considered and this does support this analysis. We would not support the introduction of differential initial assessment criteria for prospective foster carers as this creates tiers of quality and standards for children that could result in children living in homes where their long term outcomes are poorer.

Question 16: Are there any elements of Part 2 that would also need to be added to Part 3? If so, which ones?

We consider that all elements of Part 2 should be included in Part 3 as the basic criteria for assessment should be the same for all children who require foster care. The additionality when looking at specific children's needs and the relationship they have with their prospective carers is the only change that is required if the kinship fostering assessment is the continued preference for assessment.

Question 17: Do you have suggestions for any additional requirements that should be included in Part 3?

We would suggest that the section for support goes into greater depth to support the carers to consider the child in their care and evidence their ability to dynamically problem solve issues that may arise. A support plan with identified needs and support mechanisms to meet these may be a useful addition.

A 'more flexible approach to Care Planning, Placement and Case Review for kinship arrangements

Question 18: Do you think a more flexible approach to visits and reviews will be effective in meeting the needs of children and kinship foster carers?

We do consider that this approach will be more effective but this change should be connected to the child's care plan and care order and not connected to the foster carer approval status. To secure child centered change, children living in unconnected (mainstream) and connected (kinship) should be afforded the same opportunity to have a needs led flexible approach to visits and reviews. The issue should be considered with a child centred lens to create the most effective solution for all children with child looked after status.

Many children live in long term mainstream fostering arrangements and have secured permanency with their foster carers, to introduce this change for kinship only would create differential treatment for looked after children and we would not support this approach.

We would also highlight a concern in respect of support that children and their carers receive being dependent on the type of assessment that they are subject to. Local authorities will allocate resources according to their statutory duties and local demand and if permitted variations are allowed in legislation this may result in children receiving inconsistent support according to a 'postcode lottery' rather than in response to robustly identified need. There is a risk with the variations being suggested in this consultation for kinship carers that the offer for children living with kinship carers could become more inconsistent rather than less.

Question 19: What impact (including any costs and/or benefits) do you think the proposed changes to the regulations might have on different organisations or sectors within social care?

The proposed changes are unlikely to have many costs or benefits to different organisations or sectors within social care beyond reducing some time for children's social workers who will not need to visit so often. It is for this reason that we encourage Welsh Government to go further and undertake further consultation that considers securing permanency for children through more flexible arrangements that are strengthened through robust support. Arrangements such as Special Guardianship Orders, Child Arrangement orders and the introduction of an Interim SGO or Kinship order could achieve the radical reform Welsh Government is striving for with some changes to legislation.

The Special Guardianship Code of Practice has a strong foundation on which to build. The Welsh Government could legislate for an offer that is comparable to mainstream fostering support. This could provide an alternative for children to grow up in secure, nurturing homes

with carers who have parental responsibility without the stigma of being in care and with the prospect of better outcomes.

For the initial period of assessment, for children whose plan is not long term because there is potential that they can return to the care of their parents, or in circumstances where there are concerns raised during viability, we would suggest the introduction of an Interim Special Guardianship, or Kinship Order. Learning and development for prospective Guardians could be offered during this time and support networks established in the same manner that The Skills to Foster and other fostering preparation programmes afford prospective foster carers.

The proposed route of orders as opposed to fostering for children where family members are identified, would redirect local authority resource to this area instead of the ongoing assessment, supervision, support and reviewing costs that are associated with kinship foster care. Legislation that made a support plan and allowance in line with a fostering allowance (that is not means tested) would afford children the right to a family life with proportionate support tailored to the child and family rather than prescriptive duties imposed by being in care. We would consider legislation necessary to ensure that variations in practice are not continued (as they are currently) and children who are living with special guardians are not disadvantaged by not being in care as they are no longer seen as children in need and therefore not meeting a high threshold for intervention.

A more effective and efficient process for the transfer of foster carers between fostering service providers – proposed regulatory changes

Question 20: Do you agree that bringing the elements of the good practice guidelines set out within the Fostering Network's Transfer Protocol for Wales within a legislative framework, will support a more efficient process for transferring foster carers?

We support the proposal to bring elements of the good practice guidelines set out in the Transfer Protocol for Wales within a legislative framework. The framework was last reviewed by

our IFA and LA team managers forums in January 2024 and it was agreed that the protocol was fit for purpose but implementation was varied. Timelines for meetings to be held and data to be shared were not always met, partly due to time constraints experienced by the staff involved and partly due to a lack of awareness of the good practices set out in the protocol itself. The introduction of elements of the protocol into legislation should give the protocol the status it needs to ensure this process is efficient, timely and consistent. During the review, costs for the exchange of information requested were also raised as a concern. Therefore, the proposal that the requested information being provided at no cost is to be welcomed.

We also think Welsh Government needs to go further by ensuring there is clarity on the need for the full records held by a fostering service to transfer. Lack of clarity on the exact documents which much be shared will result in poor application of this change and limited impact. Bringing in more detail from the Transfer Protocol into legislation would give this clarity'

We asked for services views on this in a survey sent to our members. 50% of fostering services who responded to our recent survey said 'yes', they do agree that bringing elements of the Transfer Protocol for Wales into legislation will support a more efficient process for transferring foster carers, however 25% said 'No' and another 25% responded 'Don't know'.

Question 21: Do you foresee any issues with the suggestions being made?

The discussions that took place at our forums did suggest that the main issues with implementation of the protocol were due to it being in guidance only, and therefore not a mandatory process. When we have been contacted by services with questions about the protocol, it is usually because the parties involved have not consistently followed it and understanding has differed. There was feedback in January 2024 that it can be difficult to meet the timescales set out in the protocol, due to the number of staff involved across various agencies and including the child/children's social worker and IRO. So while bringing the timescale into legislation is to be welcomed to ensure efficiency and clarity for foster carers, it may prove challenging for services.

3 services responded to this question in our survey saying:

- "More likely to lose good foster carers rather than transfer"
- "It being followed"
- "The issue of it requiring the consent of the Foster Carer is a perplexing one - if they are "key" records then surely there should be no choice in the matter."

Question 22: What impact (including any costs and/or benefits) do you think the proposed changes might have on different organisations or sectors within social care?

In our analysis of over 100 exit interviews with foster carers leaving their service, 57% said they would foster again. There were respondents who had been terminated of approval due to a lack of support from their service who could have been retained within the wider sector in Wales if they had been given a clearer route to transfer. One respondent to our survey on this consultation said "In our experience a main reason for foster farers not wishing to move from

one agency to another even when they are unhappy is not wanting to go through the assessment process again. Simplifying the process may make them more inclined to make a move. This could put pressure on agencies that do not look after their foster carers well to do better. That would be a benefit to foster carers - but maybe a cost to most local authorities!"

As discussed below, we think the introduction of the protocol alongside the register will be make it easier for foster carers to transfer and improve portability for foster carers, especially during the eliminate profit process.

Other responses from services to the survey said:

- "Reduce number of providers and number of placements available in Wales"
- "Might increase costs"
- "I think it could be of benefit within the WG aim of eliminating profit from social care for children in Wales. I think more efficient assessment, registration and transfer for carers could support recruitment and retention of foster carers in Wales."

Accessing the enhanced fostering allowance (fee)

Question 23: Do the suggested additional paragraphs provide clarity on how the different types of foster carers can obtain the enhanced fostering allowance?

We welcome the new guidance in the Code of Practice that sets out that all fostering services should pay foster carers an allowance in accordance with the National Minimum Fostering Allowance specified for Wales and local authorities should pay an enhanced fostering allowance (fee). This will allow foster carers to hold their services to account to pay the NMA and sets out that they should receive an enhanced fostering allowance (fee).

However, we are disappointed that the paragraph does not contain any detail on how they can obtain the enhanced fostering allowance (fee) and what the rate will be as there is no national/recommended fee framework as there is for allowances. It only specifies that there will be one and that each local authority will decide this based on their own eligibility criteria. The paragraph states: "The rate of the enhanced fostering allowance may differ between one local authority and another" and "Fully approved foster carers will be able to be assessed against the local authority's eligibility criteria for an enhanced allowance." We think the enhanced fostering allowance (fee) should apply to all fostering services (both IFA and LA), not just local authorities as is specified.

In our State of the Nations survey in Wales, three quarters of foster carers (76%) and seven fostering services (64%) said governments should each set a national fee framework to apply across all fostering services.

This consultation is a missed opportunity to harmonise both fees and allowances in line with our recommended allowance rates and introduce a national fee framework for all services which the Welsh Government have been saying they will do for the past three years. We are still awaiting the outcome of the review on both fees and allowances that was conducted by Foster Wales for Welsh Government to be published and responded to.

The language used in the document is also very unclear as it does not clearly state what an allowance is and what an enhanced allowance (fee) is. The allowance is for the child and for the costs of caring for them and the fee is for the foster carer to cover their skills and expertise. The language used mixes up the two and could confuse foster carers without clear guidance on what each one is for.

Allowances

We know and Welsh Government are well aware that rates of allowances already differ hugely across each local authority so foster carers face a postcode lottery of financial support for the children in their care. Our FOIs to all local authorities in Wales in 2023 showed a difference of £1,820 to £3,224 between local authorities for different age bands.² In our State of the Nations' survey, only a quarter (25%) of foster carers in Wales said the fostering allowance, and any expenses they can claim, meet the full costs of looking after the children they foster, down from over half (53%) in 2021. Most foster carers (71%) said they use other personal income, such as their foster carer fees, savings, or partner's income, to cover this extra cost. 29% of foster carers said they have to work and 14% said they have to claim benefits to cover the extra cost

The Welsh Government has not made inflationary raises to the National Minimum Allowance for the past three years during rising inflation and rates have fallen behind England who have done this over the past three years. Over three quarters (77%) of foster carers said the cost of living has had an impact on their fostering. They frequently mentioned facing higher household costs and having to cut back on spending, affecting the opportunities they can give to the children they foster.

Improved financial support was listed as the second most important thing that needs changing in foster care by both services and foster carers. It was also listed as the second most common barrier fostering services perceived as preventing suitable applicants from enquiring to foster and one of the key reasons foster carers were thinking of leaving fostering. 26% of foster carers who have considered resigning selected financial difficulties as a contributing factor. 23% of all foster carers we surveyed in Wales told us that their fostering income is an essential part of their household income, further emphasising the importance of financial support to allow foster carers to continue in the role.

Our 2025/6 recommended rates are supported by Pro Bono Economics, are based on the Minimum Income Standard for the United Kingdom and Nina Oldfield's 'The Adequacy of Foster Care Allowances' which considers the additional costs of caring for a child in foster care. Even with the 2.6 per cent uplift which WG made last year, the NMA for 2025/6 still falls far below our recommended rates.

- £250 per week to raise a child in foster care aged 0-4 years.
- £332 per week to raise a child in foster care aged 5-10 years.
- £428 per week to raise a child in foster care aged over 11 years.

² 'Our Children Deserve Better: Calling for a Fairer Funding Framework for Children and Young People in Foster Care' (2023), The Fostering Network

Fees

Given the review Welsh Government commissioned from Foster Wales on fees, we are disappointed that this is a missed opportunity to harmonise fees and set a recommended national fee structure as exists for allowances. Our FOIs to all Welsh local authorities on fees showed there was a difference of £273 per week, £14,196 a year and no local authorities were paying a fee that was over the National Living Wage a week.³ The National Living Wage (NLW) does not apply to foster carers, but it is a useful tool for comparison to assess if foster carer fees meet the cost of living for those who rely on their fee as their main source of income.

In our State of the Nations' survey, only 13% said they feel their fee is sufficient to cover their essential living costs, for example bills, rent or mortgage, and food (not for the children they foster). Three quarters of foster carers (76%) and seven fostering services (64%) said governments should each set a national fee framework to apply across all fostering services.

We are supportive of setting out the enhanced fostering allowance (fee) in the code in principle, if it is introduced alongside a national fee framework with clear national criteria on what foster carers will receive as part of this. However, the consultation document contains no detail on this.

We recommend that all services should pay a nationally recommended fee which is reviewed each year in line with inflation. This should be uplifted to reflect different fostering situations, for example emergency or parent and child placements, where a multiplier may be applied to the fee to recognise additional requirements of the role. Any identified additional needs of children should be paid as an enhancement to the child's allowance and not to the foster carer's fee payment. Every foster carer should receive a fee payment for 52 weeks a year, provided they remain approved and available to foster children and young people matched to their family. This includes periods where the fostering service is unable to match due to factors outside of the foster carers control, such as lack of children requiring foster carers, investigations of allegations, concerns or complaints until the process is concluded.

Question 24: Does the amendment provide a clear framework for the provision of support to temporarily approved kinship foster carers?

As above, there is no clarity of arrangements as individual LAs are able to set their own individual standards for kinship foster carers. It seems quite vague in general terms and would be of little help in understanding the processes, it simply says the relevant LA will need to provide further information. It would be useful to scope out some minimum standards in this regard.

Question 25: What impact (including any costs and/or benefits) do you think the proposed changes to the Code of Practice might have on different organisations or sectors within social care?

Whilst we are pleased that the NMA and enhanced allowance (fee) will be set out in the code, as we have said above, without a national minimum/recommended fee framework and a rise in allowances to meet our recommended rates, they will may further increase the postcode lottery

³ [‘Out of Pocket: Fairer Fees for Foster Carers’](#) (2024) The Fostering Network

of allowances and fees across Wales . As we have demonstrated above, financial support is a key factor in retention and we are at risk of losing more foster carers and also struggling to recruit if allowances and fees are not harmonised and increased in line with what foster carers really need to be able to care for children. Although as mentioned above, it is welcome to have some clarity set out in guidance that local authorities must pay the national minimum allowance, the language needs to be clearer around the difference between the enhanced allowance (fee) and allowance.

Introduction of a Register of Foster Carers in Wales

Question 28: What are your views on a national register for foster carers in Wales?

We strongly support a national register for foster carers in Wales and have long campaigned for this. It is two and a half years since the Radical Reform Inquiry recommended the creation of a national register for foster carers, and we are pleased to see that Welsh Government are consulting on this much needed recommendation. We believe it is an essential step to achieving improved outcomes for foster carers, fostering services and care experienced children and young people.

Responses to our State of the Nations survey in Wales in 2024 highlighted that almost half (49%) of foster carers said they strongly or slightly supported proposals to create a national register, while a quarter (25%) were neutral, 17% said they need more information, and less than one in ten (9%) were slightly or strongly opposed. 46% of fostering services said they needed further information, 18% strongly supported a register, 18% were neutral, 9% were slightly opposed and 9% strongly opposed. As highlighted by the responses of our members below, we believe a national register would allow local authorities to make quicker, more suitable matches for children, ensuring they can stay local, and improve sufficiency planning and forecasting supply for fostering services and at a national level. We also think it would improve foster carers' professional status as valued members of the team around the child, as well as safeguarding for children and portability for carers, allowing them to transfer agency more easily.

In our focus groups with foster carers, there was a considerable level of support, with 100% voting "yes" to the question "do you want a national register of foster carers" by the end of the focus group discussions. Similarly, 81% ticked "yes" in response to the same question in our recent survey. The most popular reason foster carers wanted a register was that it would be comparable to other parts of the children's social care sector where registers already exist. They felt this would enhance foster carers' professional status and increase public confidence in foster carers as specialised caregivers.

Responses from foster carers to our survey indicated that that they see it as a crucial next step for fostering, with one foster carer saying: *"It is a must moving forward. The sector is moving forward at a pace. As a foster carer I want to be able to know I'm valued and supported. It will support all foster carers at a national level. And hopefully streamline services, which is overdue".*

Additionally, much of the support for a register from our focus group and foster carer survey was based on the view that it should operate as a tool to store and share foster carer's learning and development qualifications. One foster carer said that the introduction of a national register

would be “*very positive as long as linked to recognition by a panel so that it indicates a level of training*”, emphasising the necessity to incorporate training and specialist knowledge, as this would be more effective than a list of names and addresses which services may already have.

The response from fostering services consisted of more mixed views. Services acknowledged the benefits of a national register but were more apprehensive due to the current lack of information about the register. One service responded “*I can see the benefits for services and foster carers in Wales, and in turn the children and young people they care for. It could facilitate placement finding and help carers transfer between services with more ease. However, I don't feel that I have enough in-depth knowledge about this to form firm views i.e. what this would/could look like, who would hold the register, how it would be updated, who might have access and how we ensure it is accurate and properly cared for and the data safeguarded*”. Clear communication on how a register would work operationally and a phased introduction of a register could help with this.

Another service suggested that it could be a “*benefit within the Welsh Government aim of eliminating profit from social care for children in Wales. I think more efficient assessment, registration and transfer for carers could support recruitment and retention of foster carers in Wales*”. This respondent recognised the impact it would have nationally for eliminating profit, whilst pointing out that it could help the retention of foster carers with more streamlined assessment processes.

Question 29: Do you think a fostering register could deliver the objectives of:

Increased status

Our 2024 State of the Nations survey in Wales found that although foster carers play a vital role in the lives of the children and young people they look after, they are not always recognised or valued as professionals in the team around the child. Only 58% of foster carers said they ‘always’ or ‘usually’ feel treated as an equal and valued member of the team by the children’s social worker and 80% responded that they are always or usually invited to meetings with teachers/educational professionals. We believe introducing a national register for foster carers in Wales would help increase foster carers’ status at a national level. Foster carers are the only person in the team around the child and who provide formal care for children who do not have to be registered with a central body.

Responses to our survey with foster carers indicated that the majority think a fostering register could deliver increased status with 57% ticking ‘yes’, it could improve their professional status. Responses stated that it is “*Excellent news. It will increase the status of foster carers as professionals*” and another wrote it is an “*excellent idea – been a long time. Having been a foster carer now for over ten years, a national register will improve the professional status of foster carers – we are definitely viewed as the least important part of the team, whilst along with the young person, foster carers are at the very heart of the team. Ensure consistency across foster carers to share best practice, build capacity in the sector and drive up professionalism, courtesy and kindness in the sector*”.

Further to this, during our focus group with foster carers, there was a discussion around foster carers providing specialised and necessary care for vulnerable children and young people 24/7

but not being viewed as professionals like others in the care sector. Thus, focus group participants felt a national register for foster carers would support them professionally and would be in line with other current registers for professionals within the care sector. Foster carers commented that knowing the foster carer is registered might increase birth families' trust in them and also strengthen public confidence in the sector.

We also believe the register could contribute to increased consistency in learning and development undertaken by foster carers, raising the standards of L&D across Wales, by being linked to Wales's existing national L&D framework. This would increase awareness and encourage uptake of the framework. Foster carers could update their record when they complete training on the topics specified in the framework, allowing them to demonstrate that they meet the national standard of L&D, thereby raising their professional status. To support this, the national L&D framework should be made mandatory, with services required to offer training on the topics it specifies to their foster carers.

Improved portability for foster carers

We believe a national register for foster carers would help improve portability for foster carers as it would support smoother and faster transfers between services, should foster carers need to change service or move location. A register could offer a less bureaucratic method of transfer, reducing duplication and delays.

67% of foster carers responded to our survey that a national register will improve portability, specifically for circumstances where the foster carers are moving to another area, with one response stating that it *"Sounds like a good idea. Will help place children in appropriate households and will also give the chance to carry on fostering without upheaval if we move to a different area of Wales"*. During our focus group, several people raised that having to wait months for a transfer after moving to another local authority causes disruptions in fostering, which in turn results in a lengthy vacant placement which may result in foster carers wanting to leave. Similarly, another response to our survey highlighted the importance of the national register being transparent and flexible to help with portability and to be able to give foster carers the *"freedom to move to between Local Authorities etc. If your LA do not give you or do not have the placements then there is nothing we can do. The long process stops us"*.

Fostering services also stated they have experienced foster carers not wanting to move services because they do not want to re-start the assessment process. One service wrote *"Foster Carers not wishing to move from one agency to another even when they are unhappy is not wanting to go through the assessment process again. Simplifying the process may make them more inclined to make a move. This could put pressure on agencies that do not look after their Foster Carers well to do better. That would be a benefit to Foster Carers - but maybe a cost to most local authorities"*.

In our exit interviews report, 42% of participants attributed their decision to leave fully or partly to a perceived lack of support, and 54% stated their service could have offered better or more consistent support. A national register could help services to establish a national standard of support for their foster carers to ensure they do not lose carers. And as 57% of participants said

they would consider fostering again, smoother and easier transfers to another service could also thereby help retention of foster carers.

Lastly, through a better transfer process, a national register could also help with the current process of eliminating profit from children's social care by ensuring foster carers are able to efficiently and appropriately move to a not for profit service.

Robust safeguarding measures

57% of foster carers responded to our recent survey that a national register would improve safeguarding measures². We believe a national register would provide more robust safeguarding measures as it would mean that when someone applies to foster, fostering services would be able to check the register to see if they have previously been de-registered for safeguarding reasons. At the moment² a serious safeguarding risk to our children. It's not something that happens very often but we know from our members it does happen which can have devastating consequences for children.

Services share information if they know a foster carer is transferring between services -when an assessment is undertaken, it falls to the applicant to disclose that they have fostered previously and with who. If someone who is applying to foster doesn't say they have previously fostered elsewhere, the new service will have no way of knowing this unless they contact every fostering service (both LA and IFA) in Wales to check. Services can only obtain a reference from the previous fostering service IF the applicants tell them they fostered and where. The only current way to check is if the safeguarding issue has reached the legal threshold for referring to DBS. If they were terminated due to concerns/standards of care, there is no duty to report this centrally and no system to check this. Also, if a foster carer resigns in the middle of an allegation investigation and the police weren't involved, the investigation often ends there so it won't necessarily be escalated to DBS or appear on the Police National Computer. Services can run LA checks but LAs do not record the approval of FCs on their systems unless the FC is approved with the LA in question. IFA foster carers are not recorded on any LA systems. The fostering regs do not require that IFAs report approvals to the LA where the foster carer lives and LAs do not have a duty to record this information on their systems.

National data and an aid to forecasting the demand for and supply of foster carers.

A national register would greatly improve the collection of national data as it would mean there would be transparent national data about the number of available foster carers in each local authority location, their approval status, approval review date, number of placements, and whether they are a local authority or independent provider foster carer. Availability of fostering data in Wales is currently very limited; even the total number of local authority and independent fostering households is not published. We also think the register should include learning and development qualifications, as well as any specialised training or experience of caring for children with complex needs e.g. unaccompanied asylum seeking children, which would help with finding appropriate placements and better matching of children. Foster carers who responded to the survey also highlighted the importance of this. Having this information in one place would allow local authorities to be able find more appropriate placements in a more

trauma-informed, child-centred way that was more aligned to the needs of the child and should lead to more stability in placements.

Foster carers commented that a register would help ensure there are no vacant placements where a suitable match could be placed. Many foster carers discussed their experiences of a neighbouring local authority having a suitable match but not sharing the information which has prevented appropriate placements being found in a timely manner. One foster carer said: *“It will enable children to be placed faster which is mostly important and would cut waiting time for placements down”*. Our exit interview report⁴ also found that several foster carers left the service due to a lack of placements.

One foster carer in the focus group told us how she usually took parent-child placements but spent a period of time without anyone in her care as her local authority didn't have any of these placements for her. She nearly left fostering as she waited a long time without any children. However, she also had significant experience of caring for unaccompanied asylum seeking children so could have cared for these children from another local authority if there was a register and another local authority was able to search for nearby foster carers with this expertise.

The current lack of information being shared between services is contributing to poor matching. A national register could assist sufficiency planning, help achieve more consistent high-quality matching, enable authorities to share good practice across services more efficiently, and improve data and analysis at a national level to commission research on reasons for unplanned endings. It would also help create a transparent national picture of where there are higher levels of vacancies which would help both central and local government with forecasting and addressing the supply of foster carers and demand for placements. Our 2024 State of the Nations survey found that over half (52%) of foster carers in Wales said they had spent time with an unfilled space for a child in foster care – a ‘vacancy’ – in the past 24 months. The most common reason given for this was that they were waiting for a suitable match. Improved matching was also the top thing most services wanted improved in fostering.

The assessment process and full matching should still happen at a local level and although local authorities would still be the ones with the duty to place the child, for the register to function effectively we would recommend that alongside the register there needs to be a duty on IFAs to talk to their carers if the register determines they are a potential match. Foster carers should not be forced to take a match but there should be a duty to consider and/or talk to the carers because we are aware that many matches don't make it through to carers to consider from IFAs.

Another key issue that was raised in our focus group with foster carers was that while it is important for children and young people to remain close to their communities, in some circumstances it is not always in the child's best interests to remain in the same local authority. Foster carers suggested that a national register could help with the portability of placements with suitable carers outside the current local authority to ensure the child's voice is being

⁴ The Fostering Network (2025) '[Listening to foster carers: Why they leave, and how we can support retention](#)'

listened to and they are able to be moved to the best location for them. Likewise, some parent-child placements need to offer the flexibility and portability of locations as in some cases it would be unsuitable for them to remain in the same local authority, particularly in cases where domestic abuse has occurred.

Responses to our survey also suggested that standardising the information across all services at a national level is needed to bring together all foster carers and fostering services in Wales to ensure there is a consistent approach. For example, one foster carer responded that it is “*vital for us all to feel part of a bigger team where every one has the same rules to follow*” and another explained “*I believe a national register certainly promises a lot of the said benefits. I think it's a great idea. Implemented correctly, it could be a great tool to connect us all, recognise gaps in the number of foster carers in geographical locations where advertising and campaigning for fostering could be enhanced*”.

Question 30: What do you see as the disadvantages of introducing a fostering register in Wales?

Time and cost taken to implement a register

While we are in support of a national register for foster carers, it is important to note that some concerns were raised from foster carers about the management of the system, with one response explaining that if it is not set up properly it could become “*a poorly managed in a system that is already at breaking point.*”

Foster carers also commented on the funds and length of time it may take to implement, with one saying “*I don't see a disadvantage with the register, I only imagine this resource will first cost, so where is the budget coming from? Secondly, how long will it take to be fully up and running?*”

To avoid misuse and confusion around how it would work, we believe a national register should be implemented in a phased transition and communicated well at every stage to everyone in the fostering community so that the most effective system is able to develop within the budget allocated. We would recommend that there is either a pilot of the register as is taking place in Scotland or a phased transition so that the new process can be tested out and foster carers and fostering services feel less apprehensive about an entirely new system.

Data protection concerns

Both foster carers and fostering services raised concerns that if the register is mis-managed or not implemented correctly, then it might result in data leakages which could pose data safeguarding risks. Fostering services raised concerns around the management of data, stating “*The data could be open to misuse e.g. poaching of carers from other localities or across services. We would need to safeguard people's information and also to ensure that robust matching remains in place.*”

Fostering services also raised concerns around GDPR processes in relation to increased portability, specifically how much information each service / each local authority would be able to see on other services' foster carers and how this would link with each other.

The overall consensus from foster carers was that as long as the storage of data was done in a safe and secure way, then it is not an issue. As one response stated, *"as long as it is only accessed by fostering agencies and local authorities I don't think I see any disadvantages."*

We recommend that all fostering services should have access to their own foster carers' data, but only local authorities – as the authorities responsible for placing children – should be able to use the search function to look for potential matches for children. Social workers would need to be in charge of updating the information about foster carers' approval status but foster carers should have sight of their own information to ensure accuracy and be able to update it with training they have completed. This should not be burdensome for services or involve any additional data as we do not think services should be required to hold any more data about foster carers than they already do. The data should be held securely in line with GDPR legislation and not be accessible to the public. In addition, we do not think it should hold sensitive information e.g. foster carers' medical records or information about children in the household to protect data privacy. We think the only data the register should hold on children is the number of children in a household, to enable local authorities to search for foster carers with vacancies.

We believe there should also be a standard data processing agreement that is well communicated to all services so that the register is secure, safe and coordinated to avoid any misuse.

Duplication

Additionally, there were some questions/concerns from fostering services around potential duplication if the register just functions as a list of foster carers. As stated above, we believe a national register should offer a more comprehensive record of information, ideally holding learning and development records of foster carers across fostering services. We do not think foster carers should be added to a register as soon as they apply, as this might put them off – only those found unsuitable to foster for safeguarding reasons should be added, alongside approved and de-approved foster carers.

Question 31: If a register is introduced, who do you think could hold the register as a central body?

We think the national register should be held by an independent regulatory body. This should either be Social Care Wales or Care Inspectorate Wales as they both already hold existing social care registers. Foster carers and services felt that either of these bodies would work and pointed out that CIW inspect fostering services already and hold the childminder register.

One suggestion from a fostering service was *"4Cs as they already hold a lot of this data on services and their carers perhaps, or Social Care Wales as other professionals are required to do (register)"*. From our discussions with foster carers and fostering services, it was not seen as a particular need to create a new independent body as this may be costly, require more

resources and take longer to implement, but rather it would be more useful to replicate already existing registers and not reinvent the wheel.

Foster carers strongly felt that it should be held by an independent body that is not funded by the council and that consistency would be key. Some wanted similar registration bodies that exist for healthcare workers such as nurses, or a central licensing body as GPs have, who could remove registration if foster carers were found unfit to foster. Some felt this would align with the register containing nationally accredited training and elevating the professional status of foster carers. We would support some elements of this but are aware such a model would take a long time to develop and implement and may change so would suggest this needs further thought and development.

While we believe the approval of foster carers should remain a local activity, we have considered the potential benefits of centralising decisions about the termination of a foster carer's approval, such that this is managed by the body which would be responsible for a register of foster carers.

Some foster carers felt the body should have oversight by foster carers who understand fostering and that they should be represented on a panel within the body that holds the register to ensure their experiences and knowledge are recognised and communicated.

Special Guardianship Support Plan – proposed regulatory changes

Question 32: Do you think introducing a statutory requirement for local authorities/services to use the support plan templates will be beneficial and support a consistent approach for families across Wales?

Yes, this change, if implemented and monitored will support a consistent approach for families in Wales.

Question 33: Are there any disadvantages to imposing a statutory duty for local authorities to use the templates when undertaking a special guardianship support plan?

We do not envisage any disadvantages to imposing this duty when undertaking a special guardianship support plan.

Question 34: What impact (including any costs and/or benefits) do you think the proposed changes to the Code of Practice might have on different organisations or sectors within social care?

Children and special guardians should be better supported through these proposed changes which ensures a thorough assessment and review process. This should mean children's needs are supported, resulting in less instances of arrangements no longer being appropriate for children and needing to be brought into foster care. This may release more foster carer

households for children where a family member is not available to care for them, leading to less costs for local authorities needing to find appropriate care which may be out of authority or a different type of provision than is right for the child.

The proposed changes may have implications on local authority budgets and social work resource from the statutory duty being imposed. The proposed changes bring consistency across Wales through clear requirements to be considered and decisions that need to be made. Of note is the requirement to consider where a child's needs meet the eligibility for a Part 4 Care and Support Plan which may require additional resources than are being delivered now. The requirement for consideration of advocacy services, for example, may equally have a demand increase for voluntary providers. Whilst this can be seen as additional upfront cost, local authorities will need to take a longer term view of the costs that they are avoiding from children's needs not adequately being met earlier. The proposal also ensures that children and families are aware of the support they can receive no matter which local authority they reside within in Wales.