

The Rt Hon Bridget Phillipson MP

Secretary of State for Education
Department for Education
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Dear Secretary of State,

Re: Issues surrounding Clause 3 in the Children's Wellbeing and Schools Bill

I am writing on behalf of BASW England, our National Standing Committee, and members to raise serious concerns about Clause 3 of the *Children's Wellbeing and Schools Bill*, which proposes mandatory multi-agency child protection teams.

We strongly support multi-agency working and recognise that inter-professional collaboration is the best way to keep children safe and is already delivering good outcomes in many areas. However, in our view these mandated structural changes lack a rigorous evidence base, risk destabilising successful local arrangements, and could cause harm at a time when children's services and their statutory partners are already under immense financial strain and facing complex operational pressures.

Our key concerns are:

- Professor Eileen Munro, author of the 2011 child protection review, has expressed strong opposition to key elements of the Clause 3 proposals. She warned that wide ranging reforms, including the removal of independent child protection conference chairs and the increasing reliance on non-social work qualified staff for child in

need cases, are “very likely to fail” due to insufficient testing, risks of system instability, and potential harm to children.

- There’s no need for additional legislation – the aims of Clause 3 could be achieved more flexibly through statutory guidance, which can be more easily adapted as new evidence and evaluations emerge.
- Clause 3 risks fragmenting and duplicating services which will weaken the continuity of relationships essential in child protection.
- The recent initial pathfinder findings stated that resourcing was a key concern across Wave 1 and Wave 2 areas. This was also a key challenge across partner agencies, with partner agencies expressing nervousness about assuming the FHLP role and the additional strain it would place on their already limited capacity.
- Although there were some pockets of successful data sharing, evidence of streamlined communication and data-sharing practices under the FFCP was limited.
- No additional funding has been identified to support the substantial structural changes that Clause 3 would necessitate and thus pressures on local authorities would be exacerbated.

BASW England cannot support Clause 3 in its current form, and as stated above, we strongly believe the contents of the Clause should be removed from the bill and incorporated if necessary, into to the associated guidance.

We remain concerned that significant structural changes are being pro-actively encouraged via the Families First Partnership guidance, whilst the evaluation of the pathfinders has been limited and inconclusive in

terms of effectiveness of this model.¹ Therefore, if the clause does proceed, we urge the inclusion of a sunset clause to ensure it is time-limited, independently evaluated, and reviewed before becoming permanent.

We would welcome a meeting to discuss our concerns and to support more workable, evidence-informed approaches to strengthening multi-agency safeguarding.

Yours sincerely,

Maris Stratulis
National Director, BASW England

Vava Tampa
Chair, BASW England

¹ <https://www.gov.uk/government/publications/families-first-partnership-programme>