

Children's Wellbeing and Schools Bill Committee

About Barnardo's

At Barnardo's, our purpose is clear - changing childhoods and changing lives, so that children, young people, and families are safe, happy, healthy, and hopeful. Last year, we provided essential support to 356,200 children, young people, parents and carers through 760 services and partnerships across the UK. For over 150 years, we've been here for the children and young people who need us most – bringing love, care and hope into their lives and giving them a place where they feel they belong.

We are submitting evidence to the Children's Wellbeing and Schools Bill Committee to highlight where we believe the Bill should be strengthened to deliver bold and ambitious change for children. Whilst the Bill contains many welcome provisions, the challenges - from child poverty to record numbers of children in care - remain stubborn, and we believe now is the opportunity to achieve transformational change for this generation of children and the next.

For more information contact on this written submission please contact *Sundeep Kaur Bhogal, Policy and Public Affairs Lead (England): Sundeep.bhogal@barnardos.org.uk*

www.barnardos.org.uk

Executive Summary

- Following [oral evidence](#) by Barnardo's CEO, Lynn Perry MBE to the Children's Wellbeing and School Bill Committee on 21 January 2025 (2nd sitting), this written submission is divided into two sections: i) proposed amendments to existing provisions in the Bill; and ii) proposed new clauses in the Bill to address omissions.
- **With 4.3 million children living in poverty, one in five children are living with a diagnosable mental health condition and more than 80,000 children in the care system, bold changes are needed to move the dial for children, young people and families.**
- This submission sets out the changes needed to tackle these challenges through amendments to:
 - **Strengthen the duty to provide sufficient early intervention services** – backed by national government funding -to tackle interconnected challenges facing families. This will help more children and parents to access support before they reach crisis point.
 - **Extend corporate parenting responsibilities.** This should also extend to having a legal duty to complete asylum decisions by the time unaccompanied asylum-seeking children leave care.
 - **Place a new requirement on the Secretary of State for Education to publish a national offer for care leavers, detailing their entitlement to a range of support.** Amendment NC40 will help support care leavers as they transition to adulthood.
- Please note we have submitted evidence with NSPCC, Royal College of Paediatrics and Child Health (RCPCH) on the physical punishment of children.

Section 1: Proposed amendments to existing provisions in the Bill

Family group decision making (Clause 1)

1. Barnardo's supports provisions in **clause 1**, which will introduce a statutory obligation on local authorities to offer family group decision making before commencing proceedings for a care or supervision order.
2. Barnardo's has used family group decision making for several years. Our experience is that this works best and is most likely to be effective when it is delivered by independent, trained individuals, who are trusted and skilled in developing a rapport with each family member and in navigating family dynamics. While family group decision making is a helpful tool for many families involved in care proceedings, there are a limited number of circumstances when it is not appropriate, for example in cases involving domestic abuse.
3. **We recommend that Clause 1 is strengthened to require the Secretary of State to issue statutory guidance on the provision of family group decision making within a given time period. The guidance would outline what a minimum offer of family group decision making should include, drawing on evidence of effective practice, and how to decide whether it is consistent with protection from domestic and other forms of abuse.**
4. **We support amendment 49, which would extend the offer to families where a care order is to be discharged for the purposes of reunification.**

Child Protection and Safeguarding (Clauses 2,3,4)

5. Barnardo's supports the provision in **clause 2** which requires childcare and education agencies to be considered a "relevant partner" in safeguarding arrangements. Education staff often spend more time with children than other professionals, meaning they can be uniquely well-placed to identify and respond to concerns early – currently schools make one in five referrals to children's social care¹. While in many areas schools already participate in discussions with other statutory partners, research suggests that in some areas, schools are 'kept out' of safeguarding partnership conversations².
6. However, the Bill falls short of making schools a full statutory safeguarding partner under Chapter 2, s.16 of the Children and Social Work Act 2017. This means that education would not necessarily be involved in strategic local decision making, and its perspective could be missing from crucial work to improve the way whole systems work together to keep children safe.

¹ Department for Education (2024) [Children in need, Reporting year 2024 - Explore education statistics - GOV.UK](#)

² Wood, A. (2021). [Wood Review of multi-agency safeguarding arrangements - GOV.UK](#)

7. We recognise that there are challenges in making education a full statutory partner. However, in line with the recommendation of the Independent Review of Children’s Social Care³ we believe **the Bill should make education a statutory safeguarding partner under s.16 of the 2017 Act**, with commencement of such a clause after the necessary consultation has taken place.
8. Barnardo’s also supports **clause 4** of the Bill, which aims to improve information sharing between agencies through the introduction of consistent identifiers. We believe this significantly improve how agencies work together to safeguard children, including children who move schools or local authority areas, and children outside of the school system. It should also ensure better support for children who are victims of modern slavery, who often face delays in being identified as eligible for support services due to variations in their records.
9. However, as currently drafted the clause does not require all agencies to use an identifier for all children. Instead, the “designated person” faces a degree of discretion in whether it is beneficial. This could mean that professionals are not presented with a full picture when assessing the extent to which children are vulnerable to harm.
10. **Barnardo’s supports amendments 43, 44 and 45 that would significantly strengthen these provisions by giving the Secretary of State the power to require that every designated person uses a consistent identifier in relation to all children.**

Support for Children in Care, leaving care, or in kinship care and carers (Clauses 5,6,7,8)

11. There is a growing consensus that kinship care should be considered more frequently as an option for children who cannot live safely with their birth families. However, the Bill provides limited new support for kinship carers.
12. **Barnardo’s supports amendments that would provide a “kinship care allowance” (NC27), a right to kinship care leave (NC26) and the extension of pupil premium and priority admissions arrangements to those in kinship care (NC28 and NC29).** Together these would significantly reduce financial barriers and assist extended family in caring for a child where this is in their best interests. This would likely create significant savings to the state in the longer term, by increasing the child’s stability and reducing requirements for costly interventions later.
13. Barnardo’s welcomes the Bill’s intention to improve support for care leavers, though we believe it should go much further to transform their life chances. Young people who leave care have significantly worse outcomes than their peers: 38% of care leavers aged 19-21 are not in education, employment or training compared to around 13% of all young people⁴; just 14% of

³ Independent Review of Children’s Social Care (2022) [Independent review of children's social care - final report](#)

⁴ Department for Education (2024) <https://explore-education-statistics.service.gov.uk/find-statistics/children-looked-after-in-england-including-adoptions>

care leavers go to university compared to 47% of all young people⁵; and an estimated 1 in 3 care leavers become homeless in the first two years after leaving care⁶.

14. We welcome the provisions in **clause 7 and clause 8** that introduce a statutory right for all care leavers to be assessed for ‘Staying Close’ and that require local authorities to publish ‘local offers’ listing the accommodation available locally. However, with c. 70% children in care living in foster care, there is a strong case for extending the Staying Put scheme (as recommended in the Independent Review.) This should be brought in line with the proposals for Staying Close, so that both options are available to care leavers up to the age of 25, enhancing their chances for stability.
15. **Barnardo’s support amendments 12, 13, 14 and 15 which would bring the entitlement to Staying Put in line with Staying Close, including extending the entitlement to care leavers up to the age of 25.**
16. Transforming outcomes for care leavers requires a range of public bodies to provide more and better support. Accordingly, the Government has committed to extending corporate parenting principles so they apply to a wider range of bodies⁷, but this is not reflected in the Bill.
17. **Barnardo’s is calling for the Bill to be amended to extend the corporate parenting principles contained in the Children and Social Work Act 2017 to a greater range of public bodies including the Home Office, health, housing and the police. This would include a requirement for children in care who arrive in the UK as Unaccompanied Asylum-Seeking Children, to have their status regularised, by the time they leave care.**
18. **We strongly support amendment NC40 which would introduce an obligation on the Secretary of State for Education to publish a national offer for care leavers.** This amendment would build on provisions in the Children and Social Work Act 2017 which requires all local authorities to produce a “Local offer” for care leavers. For the first time, care leavers would have clear entitlements to vital support outside the remit of the local authority.
19. The new national offer should be developed by the Secretary of State for Education in partnership with other relevant Ministers and should be informed by young people. However, based on our experience and on young people’s views and experience, we believe a minimum set of entitlements should include:

⁵ CIVITAS (2023) [How many care leavers go to university?](#)

⁶ All Party Parliamentary Group for Ending Homeless (2017)

https://www.crisis.org.uk/media/237534/appg_for_ending_homelessness_report_2017_pdf.pdf

⁷ Department for Education (2024) [Keeping children safe, helping families thrive](#)

- For those eligible for Universal Credit, payment at the ‘over 25’ rate.
- Financial support for a rent deposit or access to a ‘corporate guarantor’ (which could be the local authority) - this would improve care leavers’ access to properties in the private rented sector
- Free bus travel
- Free NHS prescriptions

Accommodation of children (Clause 9)

20. Barnardo’s is concerned that provisions to create Regional Care Cooperatives may not deliver improvements for children. We are particularly concerned that moving to a regional model could result in an increase in children being placed a long way from their birth families even if placed in a “nearby” local authority - risking loneliness and isolation.

21. Regionalisation has already been tried in relation to adoption, with limited evidence of success. Regional Adoption Agencies were first introduced in 2015 and 29 have been set up across England. Today, children in England are waiting longer to be adopted - it now takes on average 2 years and 5 months for a child to be adopted which has increased from 1 year and 11 months in 2018⁸.

22. Given that two pilots are underway, **we recommend that the clause is amended to delay the implementation of Regional Cooperation Agreements until those pilots can be evaluated.** This should be based on measures including: a) reduction in the number of children in out of area placements; b) increase in the number of children in placements that match the recommendations in their care plan; c) reduction in the average number of placement moves per child; and d) reduction the number of children going missing from their placements.

Breakfast Clubs (Clause 21)

23. We support the proposed introduction of breakfast clubs in all primary schools in England. Up to 30% of children skip breakfast regularly, with pupils from the most-deprived backgrounds the most at risk⁹.

24. Breakfast clubs can help reduce food poverty and food-related health inequalities. However, around a third of schools do not comply with minimum food standards – often because they don’t have suitable cooking facilities, and often in the most deprived communities¹⁰.

⁸ Department for Education (2023) [Children looked after in England including adoptions, Reporting year 2021 - Explore education statistics - GOV.UK](#)

⁹ Gibson-Moore et al. (2023) No food for thought – How important is breakfast to the health, educational attainment and wellbeing of school-aged children and young people? *Nutrition Bulletin*. Available from: <https://doi.org/10.1111/nbu.12652>

¹⁰ National Institute of Health Research and University of Birmingham (2024) [School food policy in secondary schools in England and its impact on adolescents' diets and dental health: the FUEL multiple-methods study | NIHR Journals Library](#)

25. The Bill should include measures to ensure that breakfast clubs are held to the same nutritional standards as school lunches. It should also ensure current school food standards are made compulsory, with clear reporting and accountability mechanisms.

Children not in school (Clauses 24-29)

26. The Bill rightly requires that parents must obtain the consent of the local authority to withdraw their child from school if there are ongoing child protection investigations under S47 of the Children’s Act 1989 or action is being taken under that provision. However, this provision will only protect a subset of children who may be at risk.
27. School is a major ‘protective factor’ in keeping children safe from harm at home, online and in the community. This was a key finding of our work during the Covid lockdowns, where Barnardo’s worked with over 80 local community organisations to deliver the **See, Hear, Respond** programme funded by the Department for Education (DfE). We reached over 100,000 children and young people whose safety or wellbeing was at risk as a result of not being in school¹¹.
28. We are therefore concerned that limiting the need for a risk assessment to children subject to a s.47 enquiry or a Child Protection Plan sets the bar very high and risks other children falling through the gap (especially with thresholds for any support remaining so high). The latest official data shows that half of Children in Need (s.17) had abuse or neglect at their primary need at assessment, but as drafted the legislation will not protect these children if their parents look to withdraw them from school.
- 29. We believe these protections should be extended to include children identified as ‘in need’, where abuse or neglect is assessed as their primary need.**

Section 2: Proposed new clauses in the Bill to address omissions

Early intervention

30. Children’s social care is locked in a vicious cycle. Chronic under-funding has led to too many children reaching crisis point before they are assessed for and/or provided with suitable support. Meanwhile, the number of children who have already experienced harm and/or who need to enter the care system is rising. This has left local authorities with little choice but to spend an increasing proportion of their limited funds in late intervention services, and to reduce investment in early support for families and young people. This problem was a significant finding of the Independent Review¹² which found that for families in need of help there needed to be “*a fundamental shift in the children’s social care response, so that they receive more responsive, respectful, and effective support*”. Recent analysis by Pro-Bono Economics on behalf of

¹¹ Barnardo’s (2021) [See Hear Respond England: Evaluation Report | Barnardo's](#)

¹² Independent Review of Children’s Social Care (2022) [Independent review of children's social care - final report](#)

Barnardo's and the other leading children's charities shows that spending on late intervention, such as care placements and child protection, increased by £560 million in the last year alone, and England now spends over 11 times more on late intervention than investing in preventative services like family centres and youth work¹³.

31. The current legal framework requires local authorities to provide services to children who are assessed as unlikely to achieve or maintain a reasonable standard of health or development without them (s.17 of the Children's Act 1989). However, while the threshold for intervention is set in statute, a survey of Directors of Children's Services found that "*the application and interpretation of thresholds and the management of risk..., varies between authorities*"¹⁴. The same survey found that around half of respondents observed that there had been threshold change in their local authority in the last two years which had made a difference to the level of safeguarding and early help activity. This chimes with the observations of Barnardo's front line workers, that many children are not meeting the threshold for support, whilst they would have done in the past.
32. Moreover, parents are facing an increasingly complex range of challenges – from the cost-of-living crisis, to mental health and addiction, to newer issues such as keeping children safe online and addressing the long-term effects of missing school during Covid. We have always believed that families need services to replicate the 'village' it takes to raise a child, and this is perhaps truer now than ever before.
33. However, other than the provision on family group decision making in Part 1, Section 1, the Bill as drafted does little to ensure the provision of sufficient early help services. This is a significant gap and will frustrate long term improvements in the children's social system, as without early intervention the number of children in the care system will likely continue to grow.
34. Barnardo's has significant experience in delivering family support services through our services - In 2023–24, we supported 223,867 children, young people, parents and carers through our 75 family centres. Through this work, we experience the benefits to children of providing inclusive and friendly, safe spaces for parents, parents-to-be, carers, and children to learn, develop and access support.
35. Furthermore, analysis by Barnardo's looking at outcomes from our intensive family support service in our Isle of Wight family centre estimated that for every £1 invested, the saving to the state were approximately £2.60¹⁵. Based on the number of families the service supported in a single year, the service saves approximately £1 million per annum to the state.
36. **Barnardo's recommends that the Bill is amended to include a specific duty on local agencies to provide preventative, both universal and targeted, family centre-type support**

¹³ Larkham J (2024) [Childrens services spending 2010-2023 Final report.pdf](#)

¹⁴ ACDS (2021) [ADCS Safeguarding Pressures Phase7 FINAL.pdf](#)

¹⁵ Barnardo's (2021) [It-Takes-a-Village-the-case-for-family-support-in-every-community.pdf](#)

for children and families in every community (from pre-birth to 25). This must be accompanied by specific, targeted funding from central government, so it does not ‘compete’ with immediate demand for care and child protection services.

Mental health support in schools

37. Approximately one in five children in England aged 6 to 16 have a diagnosable mental health condition, equating to around 1.3 million. Despite the Bill’s title, it currently makes no provision for improving access to mental health and wellbeing support at school.
38. Mental Health Support Teams (MHSTs) work with teachers and mental health leads to achieve a ‘whole school approach’ to supporting children’s mental health and wellbeing, and to deliver direct support for those with mild to moderate mental health conditions. Barnardo’s has been involved in the delivery of MHSTs since the first wave was commissioned in 2018/19, and currently delivers 12 MHSTs across England, Analysis from Barnardo’s suggests a return of £1.90 for every £1 invested¹⁶. However, currently only 44% of students in schools and further education in England have a team in place¹⁷.
- 39. Barnardo’s supports amendment NC33 and recommends that this is achieved through the full national rollout of mental health and wellbeing support to all schools and colleges in England. This should be based on the MHST model as above. Barnardo’s also supports amendment NC42, establishing a measure of wellbeing that will support schools and colleges to understand their populations’ wellbeing, and the impact of interventions.**

Free school meals and tackling holiday hunger

40. All children in England up to Year 3 are eligible for a Free School Meal (‘FSM’). Older children are only eligible for FSMs if their families have net earnings below £7,400 per year (except in London, where the Mayor funds FSM for all children attending state funded primary schools)¹⁸. This leaves an estimated 900,000 children living in poverty who are not eligible for FSMs¹⁹. In Scotland, all children in Primary 1 to 5 can received FSM²⁰. The Welsh Government has committed to rolling out universal FSM provision in primary schools²¹. Northern Ireland does not provide universal free school meals, but has a much higher income cap of £15,000 per year²².

¹⁶ Barnardo’s (2022) [hardtotalk-expandingmentalhealthsupportteamsschools-MHSTs-report-jan2022-v2.pdf](#)

¹⁷ Department for Education (2024) Transforming Children and Young People’s Mental Health Implementation Programme. Data release. Available at:

https://assets.publishing.service.gov.uk/media/6641f1e1ae748c43d37939a3/Transforming_children_and_young_people_s_mental_health_implementation_programme_2024_data_release.pdf

¹⁸ UK Government (2024), ‘[Apply for free school meals](#)’

¹⁹ School Food Matters (2024), ‘[Press release: new data](#)’

²⁰ [https://www.mygov.scot/primary-school-](https://www.mygov.scot/primary-school-meals#:~:text=From%20August%202021%2C%20every%20child,free%20lunches%20at%20this%20age.)

[meals#:~:text=From%20August%202021%2C%20every%20child,free%20lunches%20at%20this%20age.](https://www.mygov.scot/primary-school-meals#:~:text=From%20August%202021%2C%20every%20child,free%20lunches%20at%20this%20age.)

²¹ <https://www.gov.wales/free-school-meals-information-parents-and-carers>

²² <https://www.nidirect.gov.uk/articles/nutrition-and-school-lunches>

41. **76% of parents polled by YouGov for Barnardo's in March 2023 think all primary school children should be eligible for free school meals**²³. Research into the impact of universal infant FSMs has found that it improves absence rates and analysis of universal primary FSM provision in London found it improved children's engagement at school²⁴.
42. In 2021 Child Poverty Action Group estimated extending free school meals to primary school children would cost £0.7bn²⁵. Research by PwC has found that for every £1 spent on universal free school meals, £1.71 was saved in core benefits²⁶.
43. **Barnardo's supports amendment NC2 which would extend free school lunches to all primary school children.** Ensuring that every child has a healthy lunch would directly improve children's nutrition, and therefore their health – both immediately and into adulthood – whilst also mitigating financial pressures on parents. As a first step, **we also support amendment NC31 which would lift the family income threshold for support from £7,400 per year to £20,000.**
44. Despite the low eligibility threshold, DfE estimates that 11% of eligible children do not claim free school meals²⁷. This equates to around 200,000-250,000 children²⁸. **Barnardo's also supports amendment NC8 which would auto-enrol eligible children onto FSMs.**
45. An estimated 3 million children are at risk of hunger during the school holidays when they do not have access to school meals. The Holiday Activities and Food programme (HAF) has been a lifeline for many; 600,000 children benefited from the scheme over summer 2022²⁹.
46. Recent reports indicate the Government has confirmed a 1 year extension of the HAF until March 2026, but there is no certainty beyond this point³⁰. **We support amendment NC5 which would guarantee the provision of food and activities for the poorest children over school holidays.** We also believe eligibility should be extended to all children in households in receipt of Universal Credit.

²³ Barnardo's (2023), '[A Crisis On Our Doorstep](#)', page 20

²⁴ Nuffield Foundation '[Impact of the universal infant free school meal policy](#)'. National Education Union and Child Poverty Action Group (2023), '[The Universalism Multiplier: the impact of universal FSM entitlement on families, schools and children](#).'

²⁵ Child Poverty Action Group, '[Fixing Lunch](#)'

²⁶ PwC (2022), '[Investing in Children's Future: A Cost Benefit Analysis of Free School Meal Provision Expansion](#)'

²⁷ Department for Education (2013), '[Pupils not claiming Free School Meals](#)'

²⁸ Sustain (2024), '[Driving uptake of Free School Meals through opt-out automatic enrolment](#)'

²⁹ UK Government (2022), '[Press Release: Holiday help: holiday activity clubs continue in 2023](#)'

³⁰ The Guardian (19th January 2026), '[Marcus Rashford's holiday scheme for kids wins reprieve from spending cuts](#)'

Conclusion

For too long, we have seen through our services families struggling without support, whilst issues like domestic abuse and mental health escalate. For too long, children have been at risk of harm at home, in their community, and increasingly online. And for too long, we've seen children leaving care without safe and appropriate housing, without a pathway into a fulfilling career, and without a loving network of family or friends to support them into adulthood. In a five-year Parliament, there may only be one chance to make a real difference that benefits young people here and now, and also for generations to come. We must use this Bill as a vehicle to be ambitious for children – especially for children who are growing up in poverty or disadvantage, and those in the care system. The Bill can help us achieve this vision – but it needs to be strengthened.

Submitted 31 January 2025