

The Promise Scotland's response to the Scottish Government's consultation on the future of foster care

February 2025

Scotland must better support its foster carers to be the best parents. Foster carers must feel valued, cared for and supported to care.

the promise, Pg 77

A note on terminology

This response mirrors the terminology used by the Independent Care Review. Wherever possible, 'system language' has been avoided, but on occasion it has been used in line with current and existing legislation for the purpose of clarity. The language changes used within the Scottish Government's consultation document are welcome (for example use of 'family time' instead of 'contact'), which reflects the findings of the Independent Care Review.

The term 'children' is used to mean those under the age of 18, in line with the UNCRC and 'young people' aged up to 26, in line with corporate parenting.

Background

[The Promise Scotland](#) is the organisation set up to support Scotland in the implementation of the findings of the [Independent Care Review](#).

The Independent Care Review resulted in a promise that by 2030 Scotland's care experienced children and young people grow up feeling loved, safe, and respected. This response to the Scottish Government consultation the future of foster care outlines what needs to be in place for the conclusions of the Independent Care Review relating to a good childhood to be realised, **and the promise made to them kept.**

It should be read in the context of the seven reports produced by the Independent Care Review, specifically [the promise](#), and alongside [Plan 24-30](#).¹ It is rooted in what was heard by the Independent Care Review.

¹ Plan 24-30 is Scotland's plan, setting out where Scotland must be by 2030 to keep the promise and provides initial route maps outlining specific steps to get there and support young people moving on from care. These route maps will be developed collaboratively with the care community and the people and organisations working alongside them and will continue to evolve.

Key messages

- The **voices and experiences** of children, young people and care experienced adults and foster carers must guide the development of further work, which must be underpinned by design approaches that embed voice and experience.
- **The vision set out in the consultation document is helpful framing** in terms of the Scottish Government's broader approach and direction of travel. The Promise Scotland supports the focus on the needs, rights and experiences of children and young people and welcomes recognition of the need for flexibility and a child-centred approach.
- Throughout the vision, and the developing plans for its implementation, it is **crucial that the specific needs of black and minority ethnic communities, and all groups that face discrimination in and around the care system, are properly understood and reflected.**
- In order to **strengthen the vision further**, it would be helpful to ensure that there is clear commitment within the vision to implementing existing duties and responsibilities—including full implementation and resourcing of Part 13 of the Children and Young People (Scotland) Act. It must align better with the conclusions of the Independent Care Review, including clear reference to supporting foster carers in line with the ten principles of intensive family support.
- **The proposed approach to flexible fostering is welcome.** The Independent Care Review heard that children benefit from stability, strong relationships, and a sense of belonging. A flexible approach that adapts to individual children and young people's needs supports these findings.
- The seven elements must be **more explicit about the Independent Care Review's core conclusions about consistent, loving relationships.** There must be alignment between the work to ensure children are not moved lots of times and the vision and approach for foster care described within the consultation document.
- The approach must also be clear about **the importance of working within a child's developmental milestones.** The option of expanding use of 'foster to adopt'/ dual registration and concurrency planning must be explored as part of this approach.
- Children and young people living with foster carers and foster carers must be **properly supported**, including access to mental health support, financial support and housing.
- Scotland must ensure that its most **vulnerable children are not profited from.** The application of that principle must be delivered in a way that does not impact the current delivery of good, important services for children.

Vision for foster care

Our vision is for Scotland's children to experience a flexible fostering approach which continually evolves to meet their specific and unique needs in a changing society and sector. This includes alternative family care, which prioritises children's experiences, and embeds within it maintaining family time, supporting families and managing cultural differences or complex needs.

It is underpinned by listening to the voice of children and young people, upholding their rights and ensuring they feel safe, loved and respected.

We will improve the current fostering system and provide ongoing support for caregivers to develop their skills and knowledge, so they can nurture the children in their care, and play their part in delivering The Promise.

What are your views on our vision for foster care?

The Promise Scotland is supportive of the Scottish Government's recognition of the importance of foster carers and of supporting and improving the current approach to foster care, in order to provide a solid foundation for delivering the transformational change demanded by the promise.

The immediate priority must be delivering on existing commitments (including full implementation of Part 13 of the Children and Young People (Scotland) Act 2014 and ensuring proper support is in place for children and for foster carers, including financial support, in advance of expanding the role that foster carers play. There is a need to avoid adding complexity or additionality to a system already under pressure. This must not dull the broader ambition, rather a focus must be on delivery and support, followed by the transformation required to keep the promise by 2030. Sequencing is key.

The vision set out in the consultation document is helpful framing in terms of the broader approach and direction of travel. It is right to focus on the needs, rights and experiences of children and young people and on listening to their voices. There is also welcome recognition of the need for flexibility and a child-centred approach (see response below for more detailed responses on the 'flexible fostering approach'). The Independent Care Review heard that children benefit from stability, strong relationships, and a sense of belonging. A flexible approach that adapts to individual children and young people's needs supports these findings.

The focus on continuous learning and evolution is also welcome. It is important to reflect on learning from other countries and jurisdictions and to continue to innovate in line with best practice and the best evidence available.

The vision would be strengthened further by ensuring there is a clear commitment to implementing existing duties and responsibilities. It must also

include clearer reference to supporting foster carers and to addressing the current recruitment and retention challenges. It is critical that existing legislative duties around support to foster carers and children are met.

In order to more clearly align with the conclusions of the Independent Care Review, the delivery of the vision must include the following elements set out in the promise. By 2030:

- The need for ongoing, intensive support for foster families (Pg 20). The principles of intensive family support that wrap around a family must be accessible to these families too (Pg 74).
- Young people will be encouraged to 'stay put' in their setting of care for as long as they need or want to. Rules, processes and culture will support that approach. There will be no regulatory or financial barriers for young people to stay with foster carers for as long as is required (Pg 78/92).
- Foster care will be valued. Foster families will have access to the support and services needed. Foster carers are cared for and supported to care, including financial support (Pg 77).
- Foster carers will know that their primary purpose is to develop nurturing, patient, kind, compassionate, trusting and respectful relationships that so that the children in their care feel loved and safe (Pg 77).
- There will have been consideration of a national register for Foster Carers (Pg 77).
- The number and quality of kinship, foster carers, adopters and other carers available to meet the needs of sibling groups, including larger sibling groups, will exceed the needs of the children experiencing the 'care system' (Pg 62).
- The workforce, including foster carers, will be recruited on the basis of their values (Pg 77/ 79). When things get difficult, values will be revisited both individually and organisationally (Pg 105).
- Children will be included in a meaningful loving way within their foster family without barriers. Rules and regulations support children to be fully included with the life of their foster carers (p.77).
- Kinship carers and foster carers will be recognised as part of the broader workforce. In particular, they will:
 - Be confident that they will receive the support they need to care for children and young people in their care. That will mirror the principles of intensive family support so that sticking with children and young people is supported, encouraged, resourced and normalised (Pg 67).
 - Take breaks. Like all families, family carers will have opportunities for babysitting and short breaks, so that they, and the children they care for,

can benefit from time away. Short breaks will support children to continue to be part of the family (Pg 101).

- Be supported and have ongoing supervision and time for reflection to prevent overwhelm (Pg 74). This includes recognition that foster carers may experience secondary trauma whilst supporting children and young people with their own trauma (Pg 77).
- There will be clear learning pathways at all levels of the workforce to foster self-awareness, emotional competency and human connection through relationships. This encourages joint learning through informal education, mentoring, coaching and support networks, as well as opportunities for shared reflective practice (Pg 108).
- Levels of payment will not determine where and who are the best people to care for a child. Rules, regulations and payments will align to allow young people to stay with foster carers (if that is what they want to do) for as long as is required.
- There will be no place for profiting in how Scotland cares for its children (Pg 111). Scotland will be avoiding the monetisation of the care of children and the marketisation of care will be prevented (Pg 111). Regulatory bodies will scrutinise any presence of profit to ensure that funds are properly directed to the care and support of children (Pg 111).
- Services within the 'care system' will not profit from care. Any presence of surplus funds generated within any part of the 'care system' will be directed to the care and support of children and young people. There will no longer be targets associated with adopting children and young people, including financial and profit based targets (Pg 75). Processes of regulation, scrutiny and commissioning will support the removal of profit from the care system.

Flexible fostering approach

The different elements of the flexible fostering proposed are:

- *High quality alternative family-based care which provides a positive family experience for infants, children and young people in the foster carer's own home.*
- *To build the potential and capacity of existing foster carers to support and facilitate family time where appropriate, in line with the child's care plan, so that children, including infants, can keep in touch with people that are important to them.*
- *As part of the child's plan, foster carers may, in some situations, have a role in supporting birth families whose children are in foster care, to facilitate reunification of the child or young person with their birth family.*

- *Foster carers may be well placed to have a role supporting families on the edge of care to enable more children to remain home.*
- *Building on existing short break provision, regular breaks, which are also child centred, would be provided to existing foster carers, or to families experiencing difficulties.*
- *Alongside professionals, we propose using more experienced foster carers who no longer wish to foster full-time, to mentor new foster carers, deliver foster carers' training and share practice and knowledge.*
- *Potentially, the facility, where it is appropriate, for a foster carer to stay in a family home, for a short time, to provide immediate support and care at times of family crisis.*

What are your views on the proposed flexible fostering approach?

What are your views on the seven different elements in the flexible fostering approach?

The Promise Scotland welcomes the Scottish Government's proposals to introduce more flexibility to Scotland's approach to foster care and to learning from innovation across the UK and beyond. It is good to see clear connections to Getting It Right for Every Child (GIRFEC) and a recognition of the importance of supporting children, young people and their families when it is needed, for as long as it is needed, in line with the ten principles of intensive support identified in the promise.

It is also helpful to see links being made between the approach and the recommendations in 'Hearings for Children' and an acknowledgement that there is no 'one size fits all approach'. The promise is clear that children thrive when they feel safe, loved and respected and a flexible approach that allows for the normal ebbs and flows of everyday life and for support to both step up and down to keep children safe is in line with the findings of the Independent Care Review.

The approach would be further strengthened by making more explicit connections to children and adults' rights, drawing clearer links between the changes identified and the incorporation of the UNCRC in Scotland. It must be clear that the seven elements help to realise children's right to be safe, protected and to belong to loving homes, for example.

The elements must be more explicit about the Independent Care Review's core conclusions about consistent, loving relationships. There must be alignment between the work to ensure children are not moved lots of times and the vision and approach for foster care described within the consultation document. 'Hearings for Children' was also clear that, where possible, children should remain

with consistent caregivers. If necessary, children should return to these caregivers—this must be reflected in the fostering approach.

The approach must also be clear about the importance of working within a child's developmental milestones. The option of expanding use of 'foster to adopt' models / dual registration and concurrent planning must be explored as part of this approach. For many children it will be possible for foster carers to work in the way described by the flexible fostering approach. For others, it will not be possible for children to return home—the 'care system' must not create unnecessary delays and must create opportunities for children to remain with loving carers when it is not possible for them to return home.

It is also important to be clearer about the need for support for children in foster care and for foster carers themselves—including mental health support.

The proposals contain a welcome commitment to working collaboratively with the sector and foster carers, to consider implications of implementing this approach. This must include care experienced children, young people and their families, as well as adults. Undoubtedly, some of the proposals contained within this approach will cause concern and worry in terms of the potential changes to the role of a foster carer. Ongoing dialogue and discussion will be important as the approach is firmed up, and the core conclusions of the Independent Care Review must be central to any changes so that they are understood, and members of the unpaid and paid workforce feel supported— "Scotland must hold the hands of those who hold the hand of the child."²

Specific comments on the seven elements

High quality alternative family-based care: See below our detailed comments on support for foster carers. This approach does not refer to the need for appropriate, safe housing—this is a core part of ensuring children and young people feel safe and are able to stay with their brothers and sisters and is a major barrier to keeping siblings together. The fostering approach must refer to the importance of warm, safe and loving homes.

Family time: Foster carers are well placed to support and maintain connections and relationships. The Promise Scotland supports the proposal that foster carers could take more of a role in supporting and facilitating family time, recognising that this expands beyond 'face to face' time together and includes messaging, letters, phone and video calls and other ways that children and young people may wish to be connected. This must complement, rather than replace, the work of skilled social workers through partnership working.

The Independent Care Review heard consistently the importance of maintaining strong relationships with important people in children and young people's lives.

² Independent Care Review, the promise, Pg 20

The promise is clear that maintaining these relationships, including with birth families (where safe) is critical for a child's identity, emotional wellbeing, and long-term outcomes. We also know that many children will return home to their families of origin, so supporting families to stay in touch, where this is safe, is an important part of keeping connections.

The Hearings System Working Group heard from foster carers who could help to support ongoing connections in this way, and some who were already doing so. Some, however, felt there were systemic barriers getting in the way which would prevent this—for example, the (current) adversarial nature of the Children's Hearings System can raise temperatures, develop a sense of 'opposing sides' and can exclude foster carers.

In order to adequately support the intention of this element, there will be a need to address these systemic barriers, to ensure that children and their family members and carers are safe, and that family time is in everyone's best interests. Where there is a breakdown in relationship between family members and foster carers, there will be a need for additional support to navigate complexities.

Foster carers will also require additional support and robust scaffolding, for when things are difficult, alongside bespoke training focussed on the unique needs and voice of babies and infants.

Supporting birth families to facilitate reunification: It is good that the consultation recognises that foster carers may have a potential role in supporting birth families whose children are in foster care to provide advice and support to strengthen family connections and encourage sustainability of relationships. Some caution is required around the use of the term 'facilitate reunification', not least because it introduces new system jargon that is unlikely to be recognised by children and families. It is also important to ensure that the different roles of the social worker and the foster carer are clearly understood. While there are opportunities for foster carers to better support connections between children, young people and birth families, foster carers are not social workers and there must not be a blurring of the boundaries of the two roles.

The work to 'support reunification' must be multi-disciplinary, and all members of the unpaid and paid workforce involved must have high quality training and support to enable this.

This element also references assessments and planning for children returning home. While foster carers must be a part of the planning process (including planning for what happens if a return home does not work), the responsibility for the transition planning must not lie with foster carers.

The references to Lifelong Links are welcome. Further clarity is required on how this service will be offered to all children and young people who would find it

useful, and how it will be sustainably resourced and equitably accessed across Scotland.

It is important to ensure there are no rules and regulations getting in the way of foster carers building and maintaining loving relationships with children, including their ability to make decisions that allow children to have normal, healthy childhoods. This includes, for example, decisions about school trips and going on sleepovers. When children return home, when it is appropriate, there must also be improved mechanisms for foster carers who have played an important role in a child's development, to maintain connections and keep in touch if that is what the child wants.

Supporting families on the edges of care: The suggestion that foster carers could support families on the edge of care aligns with the Independent Care Review's focus on early help and support and the evidence around the importance of a child's early development. It is therefore good to see the inclusion of this element, and references to evidence-based programmes such as 'Step Up, Step Down', as a way to develop innovative practice and wraparound support for families in line with the ten principles of intensive family support described in the promise.

The creation of a distinct foster care role would help to ensure that foster carers working in this way alongside families can be properly trained and supported, and as such it is welcome to see reference to mentoring skills, practice support and advice and high-quality training for foster carers. The promise is clear that foster carers must be seen as members of the workforce and provided with opportunities for feedback, reflection and additional support. We have commented more on this in our answers around implementation of these elements.

Building on short break provision: Like all families, the opportunity for children and foster carers to have regular breaks is important. The word "respite" must never be used, and the primary reason must not be about foster carers getting a break from the children in their care. Children must only ever stay away from their home with other people whom they trust and have an ongoing relationship with. Being away from their main home must be a time of fun, treats and enjoyment. There must be active consideration about the breadth of adult relationships available when a child is placed in a care setting, so that time away from home feels natural, normal and a good place to be.³

Involvement of experienced foster carers: The promise was clear that foster carers must be supported, including through extensive training, reflection, feedback and development opportunities. Peer support and mentoring, in particular, will help to improve mental wellbeing and resilience amongst carers,

³ Independent Care Review, the promise, Pg 88

and impact on retention. These are key factors for ensuring that the new foster care approach is sustainable and works well for both children and for carers.

Foster carer staying in a family home: The ten principles of intensive family support are clear that there must be no ‘out of hours’ services and that Scotland must invest in innovative ways of working alongside families to keep children safe. The inclusion of the suggestion that, where appropriate, foster carers may stay in a family home to provide immediate support and care at times of family crisis will lead to some courageous and important discussions.

It is important that there is not a blurring of the boundaries between a social worker and a family support worker. This element is more akin to the work undertaken by family support workers rather than foster carers, and it is therefore important to consider which members of the workforce have the most appropriate skills to work in this way alongside families.

There are clear advantages to keeping children in their homes, schools and local communities and minimising disruption. It is therefore important to discuss this element more broadly with children and families, members of the care community, social workers, foster carers and other members of the workforce to consider how it might work in practice.

What implications does a flexible fostering approach have for how fostering is funded and how foster carers are remunerated?

The proposed flexible fostering approach has significant implications for how fostering is funded. The expansion of roles and responsibilities is likely to lead to an increased need for more sophisticated and detailed training and support.

Foster carers must be able to adequately and appropriately support the children in their care—and to do so they must be able to adequately and appropriately support themselves. This includes ensuring they can access safe and affordable housing that encourages and enables brothers and sisters to stay together, including larger sibling groups. The promise is also clear that foster carers must have all the support they need in order to avoid ‘crisis’, mirroring the principles of intensive family support. This is in line with the existing provisions contained within Part 13 of the Children and Young People (Scotland) Act 2014. This must be fully resourced and implemented in full.⁴

As set out in the promise, foster carers must be seen as part of the workforce. Resourcing will therefore be required for peer support, mentoring and appropriate facilitation of reflection and development.

⁴ Independent Care Review, the promise, Pg 77

The promise was clear that “children must never again feel the monetisation of their care. They must be included in a meaningful loving way within the foster family without barriers.”⁵ Payments for foster care must help to support foster carers, but there must not be a sense of monetary gain or financial motivation in caring for children. This includes a cultural shift in how financial support is perceived, to ensure that, whenever foster families are caring for children alongside their birth children, that they are treated equally.

See below for our comments on ‘retainer’ payments.

How can the Scottish Government, working with you, support the delivery of the flexible fostering approach?

While the flexible fostering approach has significant potential benefits, its implementation must be guided by the following key principles:

- The **voices and experiences** of children, young people and care experienced adults and foster carers must guide its development and be underpinned by design approaches that embed voice and experience. This includes careful consideration of what the Independent Care Review and the Hearings System Working Group heard—there must be no ask of people to retell their stories. What has been heard already must be taken into account and new ideas, solutions and innovations must be tested.
- The immediate priority must be **on implementation of existing duties** relating to foster carers, including Part 13 of the Children and Young People (Scotland) Act 2014, and enhancing support (including financial support) for kinship carers. Transformational change is not possible without a strong foundation upon which to build.
- The **broader external environment and workforce challenges** must be addressed in tandem. In particular, foster carers cannot support children well if there are not enough social workers. Planning around workforce recruitment and retention must be stepped up and changes made that sequence with the flexible fostering approach in order for it to be successful.
- There must be **clear communication** across the system and amongst children, families and foster carers about what is changing and why.
- There must be **no confusion between distinct roles and foster carers must be clear of the expectations of changing practice**. It must be clear that foster carers are part of multi-disciplinary teams where their voices (in

⁵ Independent Care Review, the promise, Pg 77

addition to the voices of children and families) are listened to and respected, in recognition of the important role they play in children's lives.

- **Increased funding** must be available for expanded training, mentoring, peer support, mentoring, trauma recovery and intensive family support and short breaks.
- Considering how to **reduce inequity and ensure there is not significant variation in practice and expectations across the country.**
- There must be **clear mechanisms for monitoring and evaluation** of a flexible fostering approach so that we know what is working and what is not and, crucially, to ensure it meet children's needs.

These steps will help achieve the vision outlined in the consultation while advancing Scotland's commitment to keeping the promise.

Independent fostering agencies

What is the role of Independent Fostering Agencies (IFAs) in the future of fostering?

Should we require all IFAs to have charitable status? Please explain.

Should we limit how much local authorities can pay to IFAs? If so, why and how would we do it?

Should IFAs be required to pay their foster carers the Scottish Recommended Allowance (SRA)?

What more could be done nationally to support local authorities when paying for placements from IFAs (including forecasting, market shaping and procurement)?

The Independent Care Review's conclusions were clear: Scotland must ensure that its most vulnerable children are not profited from. The application of that principle must be delivered in a way that does not impact the current delivery of good, important services for children. [Follow the Money](#) and [The Money](#) demonstrate that Scotland needs to take a different approach to how it invests in its children and families.⁶

In order to do this, the promise states that regulatory bodies must scrutinise any presence of profit to ensure that funds are properly directed to the care and support of children. It also states that Scotland must avoid the monetisation of the care of children and prevent the marketisation of care.

⁶ Independent Care Review, the promise, Pg 111

We are aware that this is a complex issue that expands beyond foster care into all types of care that impact on the lives of children and families. However, the consultation clearly raises a number of issues that must be addressed in order for the promise to be kept. Specifically:

- If Independent Fostering Agencies (IFAs) continue to operate in Scotland as part of the vision and flexible fostering approach described in this consultation, they must operate in line with the core conclusion from the Independent Care Review that there is no profit in care and that all funds are properly directed to the care and support of children.
- The new approach to foster care must facilitate a managed transition to ending profit in care. In the interim period, IFAs must be required to pay their foster carers at least the Scottish Recommended Allowance (SRA) or higher.
- In the short term, there must be increased transparency around fees and profit.
- IFAs must prioritise children's needs and rights rather than administrative costs. There is a need for greater accountability around how funds are allocated.
- Multiple moves and moving children away from local communities linked to use of IFAs must be stopped.
- There must be clearer mechanisms for formal market oversight in respect of care services and scrutiny of IFA costs.
- There is a need to ensure alignment between any proposed changes to IFAs and other efforts to reduce and remove profit in Scotland's 'care system'.
- As stated in the consultation document, there is a reliance on IFAs and indicative evidence that local authorities could provide some placements more cheaply than by purchasing them from IFAs. The Competition and Markets Authority Children's social care market study found that IFA placements in Scotland were higher than in England and Wales
- There is ongoing work in England and Wales to reduce profit from their respective 'care systems' must be reviewed and lessons learned for Scotland.
- The conclusions of the Independent Care Review are clear that 'Scotland must make sure that its most vulnerable children are not profited from' and there are opportunities to learn lessons about how to achieve this from parallel work to fulfil this ambition within England and Wales's 'care systems'.

There is a lack of consistency across local authorities and compared to IFAs – whether that is access to training, peer support, and 24/7 assistance. There is an opportunity for the Scottish Government and local authorities to work collaboratively to identify what is working and how some of the training and support can be enhanced and shared.

Recruitment of foster carers

What are your views on the 'offer' described above?

What more can the Scottish Government and local authorities do to recruit foster carers? Please explain your answer. You may wish to share successes and challenges of recruitment of foster carers in your response.

There are benefits to be gained from taking a national approach to some aspects of recruitment and support for foster carers, including national action to recruit more foster carers.

The proposed national recruitment campaign, funded by the Scottish Government, is crucial for raising awareness and attracting new foster carers. A coordinated campaign can amplify efforts and reach a broader audience, potentially increasing the number of foster carers. The Independent Care Review emphasises the importance of visibility and recognition for foster carers, which this campaign could enhance.

Recruitment campaigns must be trauma informed, building on learning from when previous efforts across Scotland have reinforced stigma. There must be co-design with children, young people and adults with experience of foster care and foster families to ensure campaigns are positive and effective. The [Independent Care Review's Evidence Framework](#) may also be useful.

That said, national and local recruitment campaigns alone may not be enough. There is a need to explore more innovative and radical approaches to attracting a wider demographic to foster care. Doing more of the same is unlikely to deliver the change needed.

Foster care is one of the places where children may live, and if work to embed concurrent planning is underway, consideration must be given to consistent and aligned communications across different home settings.

The focus must be on children remaining in consistent homes with consistent, loving adults for as long as is needed—and it must therefore be clear that some children may be with foster carers for longer periods of time.

Retention of foster carers

What is your experience of the SSSC 'Standard for Foster Care' and do you find it helpful?

Should there be a new national learning framework for foster carers which could also be a pathway for continuous development?

What more can the Scottish Government do to nationally support the learning and development of foster carers?

What, if any, specific support might be needed to ensure that foster care in Scotland is attuned to the unique and specific needs of infants and very young children?

What other practical support would help foster carers?

What, if any, additional learning and development would be needed for the 'flexible fostering' approach?

The Scottish Government's focus on the retention of foster carers is crucial for ensuring that children and young people in care receive the support they need.

It is critical to ensure that the Scottish Social Services Council (SSSC) Standard For Foster Care, is implemented consistently across all local authority areas. Scottish Government and CoSLA should jointly consider how best to ensure that all local authorities adhere to these standards and accountability is clear. Regular audits and feedback loops can help maintain consistency and quality in training and support.

The development of trauma training and resources is a positive step, particularly for foster carers working alongside children who have experienced significant trauma. In addition to pilot programmes in 2025, ongoing trauma-informed training must be integrated into the Continuous Professional Development (CPD) framework for all foster carers. This could include online modules and workshops that address evolving needs.

Foster carers have consistently expressed a desire for more consistent reflective supervision, peer support, and mentoring. The Scottish Government could facilitate the establishment of structured peer support networks, akin to the Mockingbird model, which has proven effective in enhancing carer retention and support. This would allow foster carers to share experiences and strategies in a supportive environment.

Foster carers require timely and transparent financial support to feel valued and secure in their roles and to ensure the children they are caring for get the help and support that they need. This includes support to help manage finances, such as financial literacy programmes. See our comments below regarding financial support for foster carers.

Foster carers—and the children living with them—often face complex challenges that may require specialist support. That support must be readily available without foster carers having to fight for it, including access to mental health support, counselling, trauma recovery or therapeutic support. The needs of unaccompanied asylum-seeking children, children from black and minority ethnic

communities and children with additional support needs must be met so that the burden of seeking support is not placed on foster carers.

To ensure that learning and development initiatives remain relevant, it is crucial to gather feedback from foster carers regularly. This should include routine 'exit interviews' for those who no longer want to be foster carers, to identify reasons for this and areas for improvement in support systems.

Too often, mental health challenges are not adequately addressed in current support systems for foster carers. Developing targeted mental health resources and counselling services specifically for foster carers will help them cope with stress and emotional challenges. The Independent Care Review underscores the importance of supporting caregivers' mental health as a key factor in maintaining stable homes for children.

There must also be appropriate emergency support in place to prevent crisis when issues escalate and foster carers need additional support, without children being moved to another home. Establishing immediate assistance support can help to maintain stability and ensure foster carers are equipped with the help they need.

The engagement work to develop Plan 24-30 also highlighted the following areas underpinning the current crisis that must be addressed in order to improve recruitment and retention of foster carers:

- **Availability of appropriate housing stock.** Some local authorities are supporting foster carers to make changes to their homes or move, in order to support brothers and sisters stay together, in particular larger sibling groups. More must be done to help alleviate the problems caused by the lack of appropriate, safe housing.
- **Continuing care.** Although there is broad support for continuing care, there are concerns that its implication is limiting the number of foster carers who are then available for younger children or children just entering the 'care system'.
- **National Transfer Scheme.** The increasing numbers of children arriving in Scotland through the National Transfer Scheme, with different needs, mean that current foster care arrangements are under increasing pressure and are too often not fit for purpose.

Financial support

All foster carers receive a weekly fostering allowance which is calculated to cover the cost of caring for a looked after child, which it is acknowledged is greater than the costs of looking after a for child who has not got experience of care. This includes food, clothes, toiletries and other reasonable expenses, and it is not remuneration

for the caregiver. The allowance received will depend on the age of each child. The Scottish Government committed to setting a Scottish Recommended Allowance for Foster and Kinship carers (SRA). The SRA was introduced in August 2023 and a review of the SRA is taking place. It will assess whether the policy intent, which was to bring transparency and consistency to allowances in Scotland, has been achieved in practice, what is working and what is not, and areas for improvement.

How effective is the current financial model for foster carers? Is there an alternative? Please explain your answer.

The introduction of the Scottish Recommended Allowance (SRA) was very welcome, albeit long overdue. The introduction of the SRA represents a significant step towards standardising financial support for foster carers across Scotland. By providing a minimum allowance, the SRA enhances transparency and consistency, addressing long-standing disparities in payments across local authorities. The promise is clear that adequate financial support is essential for foster carers to provide quality care.

However, foster carers have highlighted ongoing concerns that the SRA may still fall short of covering what is needed financially to care properly for children, and that this could hinder recruitment and retention efforts.

The ongoing review must seek to understand what additional financial support is required for foster carers in order to keep the promise and implement the proposed flexible fostering approach. The findings must be implemented.

There must also be further work to ensure that the SRA increases in line with inflation and adequately supports foster carers over time. The current SRA has not yet been adjusted for inflation, potentially leading to a real-term reduction in support as living costs rise. The Scottish Government must commit to annual reviews of the SRA, adjusting it in line with inflation to ensure it remains sufficient to meet the needs of children in the 'care system'.

There must also be further consideration of national guidelines for fees and allowances and the need for improved scrutiny and monitoring, in line with the conclusions of the promise about removing the monetisation of care.

Engaging with stakeholders, including foster carers themselves, is essential for understanding the effectiveness of financial support structures. Continuous dialogue can help identify areas for improvement and ensure that policies reflect the realities faced by foster carers. Regular consultations with foster carers and representative organisations can provide valuable insights into how financial supports can be enhanced.

While the current financial support model for foster carers in Scotland has made significant strides—particularly with the introduction of the SRA—there are critical areas needing attention. By addressing variability in payments, ensuring

transparency, adjusting for inflation, and engaging stakeholders, the Scottish Government can create a more equitable and sustainable financial framework that supports foster carers effectively. Many foster carers, like many families, who dedicate their lives to loving and nurturing children have reported living in poverty and accessing food banks— this must be urgently addressed by ensuring allowances are adequate and proportionate and housing needs are met.

Fees are separate and are paid in addition to allowances. They may be paid by fostering services to reflect the expertise and nature of the tasks undertaken by foster carers. There is variation in fees across Scotland.

**Do you think there should be national approach to fees for foster carers?
Please explain your answer.**

Yes. The current model allows for variability in fees and additional payments across different fostering services, which can create inequities. The lack of standardisation means that foster carers may receive significantly different levels of financial support based on where they live or which agency they work with.

However, it is important to reemphasise again that the Independent Care Review clearly concluded that there is no place for profit in Scotland's 'care system'. Fees and allowances must support foster carers to look after children and young people and themselves.

While the national allowance is designed to cover all the costs of caring for a looked after child, many fostering services decide to provide some additional payments to cover 'one off' expenses. It is for fostering services to determine what those might be, but common extra payments include a birthday and religious festival payment, start-up costs or other payments. There is variation in additional payments across Scotland.

**Do you think there should be a national approach to additional payments?
Please explain your answer.**

Yes. See previous responses.

When foster carers do not have any children placed with them, some, but not all, fostering services pay a retainer fee. The fee is usually for a time limited period and may not cover the whole duration they do not have a child or young person in their care. While a retainer fee is being paid, the fostering service would expect the foster carer to be available to receive a child into their home, to maintain availability of a

bedroom, and to not take on additional work. There is variation in retainer fees across Scotland.

Should the financial model for foster carers include a retainer fee for when a foster carer does not have a child placed with them? Please explain your answer.

Yes. The provision of retainer fees when foster carers do not have children or young people living with them is inconsistent and may not provide sufficient financial stability. Many foster carers may find it challenging to maintain availability without adequate income during this time. Establishing a clear policy on retainer fees that ensures fair compensation would help foster carers feel more secure in their roles, thereby improving retention rates.

This is essential if the vision of flexible fostering is to be realised.

Continuing Care allowances- some fostering services will continue to pay an allowance and fee to a foster carer when a young person remains in that placement after their 18th birthday. There is variation in continuing care allowances across Scotland.

Do you think there should be a national approach for Continuing Care allowances and fees? Please explain your answer.

Yes. The option for some fostering services to continue paying allowances after a child turns 18 is crucial for supporting young people transitioning out of care. This reflects an understanding of the ongoing needs of care-experienced young people. The Scottish Government must promote best practices around continuing care allowances to ensure that all young people receive necessary support as they transition into adulthood.

Thought must also be given to the implications of sustaining relationships between young people and carers after they transition out of the home. Advice, support and allowances may need to be available to ease the transition and the ongoing relationship.

There is a need to avoid 'cliff edges' of entitlements associated with arbitrary ages. Birthdays should be a time filled with love, enjoyment and fun, not dates to be feared or worried about.

The legal requirements to publish information relating to carer allowances and fees are inconsistent. For example, local authorities are under a duty to publish (among other things) the rates for kinship carer allowances²⁰, but not the rates for foster

care allowances. Similarly, IFAs are not required to publish their foster carer allowance rates.

Would an enhanced framework of transparency with a legal requirement, for example, on local authorities and independent fostering agencies to publish foster care allowances assist foster carers and wider recruitment and retention?

Yes. The inconsistency in legal requirements for publishing information about allowances and fees can mean that it is harder to know what progress is being made to keep promise in this area. Without clear information, potential foster carers may be deterred from applying due to uncertainty about financial support. Implementing mandatory reporting requirements for all fostering services regarding allowances and fees would enhance transparency and help build trust within the fostering community.

Status, recognition and value

We have heard evidence from fostering services, foster carers, and those representing them, that more needs to be done to improve the status, value and respect given to foster carers. All the proposals in this consultation, including a national recruitment campaign should help increase the recognition and value placed on foster carers. We are also consulting, through a different exercise, at a broad level on the current definition of a “relevant person” as set out in the Children’s Hearings (Scotland) Act 2011 for the purpose of participating in children’s hearings Children’s Hearings Redesign - Scottish Government Consultations - Citizen Space. Additional proposals to improve the value and recognition of foster carers are set out below and include a national charter; day to day decision making; a national register; allegations guidance; support on raising concerns; and wider issues.

National charter

- *The development of a national charter of support for foster carers and fostering services (Local Authority and IFAs) which, we would recommend, all fostering services would have in place.*

- *The national charter would be co-designed with foster carers and local partners, and it would be principle based with a focus on supporting the value and recognition of foster carers. We hope this would empower foster carers to have a key voice and ensure foster carers feel recognised for the role they play in the children and young people’s lives they care for.*

- *The charter would set out what foster carers can expect from the fostering service and what the fostering service can expect from foster carers.*

• *The Scottish Government would develop a charter template which local authorities and IFAs could adapt for their service.*

What are your views on the proposal for a national charter of support for foster carers?

The Promise Scotland supports the proposal for a national charter of support for foster carers and fostering services. This must be rights-based and centred around what children and young people's rights are when they are living in foster care and how they can expect their rights to be upheld.

It is important that the charter would be co-designed and would offer clarity about what the fostering service can expect from foster carers and vice versa.

The charter should include specific commitments regarding training opportunities, emotional support, financial transparency, and recognition of the unique challenges faced by foster carers.

That said, having a charter is not enough on its own. Given that the charter will not have legal status there must be clear alignment with the Care Inspectorate's scrutiny and inspection role so that if the charter is not being upheld there are mechanisms for this to be raised and addressed. There must also be clear ways for children, young people and foster carers to raise concerns if they feel that the charter is not being upheld in their local area.

What else could national government do to increase the value, status and recognition of foster carers?

It is clear that support for foster carers is also support for children and young people, and vice versa. Foster carers must have timely access to support, including peer support and bespoke support, and children and young people entering 'care' must be able to access an immediate mental health assessment if appropriate.

Across Scotland, there is a wealth of evidence and wisdom on both the unique needs of babies and infants, and how these can be sensitively responded to in the context of care. This must be systematically embedded both in the context of foster carers providing loving care and support, and in the timely access to specialist help and support.

As stated above, the role of 'foster to adopt' / dual registration and concurrency planning should be considered. Decisions around permanence must be made in a child's timescales and focussing on their relationships: work to promote where appropriate the opportunities around this must form part of the vision for foster care.

Day to day decisions

A foster carer is looking after the child on behalf of the local authority and will not have parental rights for the child in their own right. What a carer can do day to day depends on whether the decision is necessary to safeguard the child's health, development and welfare in accordance with section 5 of the Children (Scotland) Act 1995, and what the person with parental rights and responsibilities for the child has agreed. Scottish Government guidance exists to support this²¹. For foster care to be successful, enabling the carer to take appropriate day to day decisions should be encouraged, and there are opportunities for carer and birth parent to work together to make this happen.

Is the existing framework under which foster carers can make decisions clear?

Would further guidance, for example good practice, be helpful to support decision making for foster carers (sometimes called delegated decision making) be helpful? If yes, please explain what you'd like it to include.

No, the existing framework under which foster carers can make decisions is not clear enough.

Further guidance and improvements are required to help support decision making for foster carers and to ensure that decisions can be made that help children to lead safe, healthy and positive childhoods and maximise their opportunity to develop lasting relationships and experience 'normal' childhood experiences.

The Plan 24-30 theme [around 'rules, processes and culture'](#) describes some of the red tape and bureaucracy that must be addressed in order to ensure children can have healthy, safe childhood experiences and concerns around 'risk' are rebalanced. The work to develop the route map for this theme must include how foster carers make day to day decisions.

A national register

What are your views on a national register for foster carers in Scotland?

How can the Scottish Government support local authorities with resource planning of foster carers, including building an evidence base and data on placements, including those outside local areas?

The Independent Care Review concluded that a national register for foster carers should be considered, recognising that they care for children within their own

home. The promise states that this *"should operate in a supportive way that is aligned to the underlying values of how Scotland must care."*⁷

The register offers improved opportunities for collaboration, information sharing, enhanced training, continuous professional development and a more standardised approach to recruitment, retention, training and support. There are also opportunities to improve safeguarding and easier ways of finding foster carers in local communities. It could also provide valuable data to inform workforce planning and help to align the interests of children and young people and foster carers better. It may offer children more choice and flexibility and more opportunity for brothers and sisters to remain safely together.

Having a national register is also a recommendation from The Fostering Network's recently published 'State of the Nation's Foster Care' report⁸, which states that Government's should introduce a register for foster carers to increase foster carer's status and support matching of children with foster carers. This recommendation is accompanied by others which focus on many of the areas discussed throughout this consultation, following their 2024 survey completed by over 3,000 current and former foster carers and 114 fostering services.

We are aware of mixed views in terms of how effective the implementation of a register would be. Concerns have been raised about data protection and whether a national register would merely duplicate existing mechanisms and add additional bureaucracy and complexity.

In balancing the contrasting views, it will be helpful to consider other areas where a national register approach has been taken, for example, the Safeguarders Panel in the Children's Hearings System, where significant lessons can be shared. The conclusions of the Independent Care Review and the broad aspirations of the flexible fostering approach must guide final decision making.

There is an opportunity for the Scottish Government to take a strategic approach to the development of a national charter and register which would, for example, ensure that registered foster carers are bound by the charter and held to account for their delivery of it. There may also be an opportunity to align or amalgamate other national registers such as those for Safeguarders Panel and Children's Panel members.

If a register is introduced where should the register be held?

The answer to this question would depend in part on the purpose and scope of the register and its links with the charter. Where possible, it would be better to

⁷ The Independent Care Review, the promise, Pg 78

⁸ The Fostering Network (2025) State of the Nations' Foster Care, Full Report 2024

align any new foster care register with existing national registers, to avoid increasing complexity and bureaucracy. Alternatively, it may make sense to have an existing regulatory body hold the register, for example the Care Inspectorate or SSSC.

What are your views on the potential to linking continual professional development to a register?

Given the current need for ongoing support for foster carers, including with respect to child development, neurodiversity and trauma, it makes sense to link continuous professional development to a register. The promise was clear that there must be ongoing support and space for reflection for foster carers to continue to care without becoming overwhelmed or inured, recognising the potential for foster carers to experience secondary trauma.⁹

What are your views on a national approach to foster care placement matching?

The Independent Care Review clearly heard that relationships must be at the heart of decision making. Any approaches around where children live must be rooted in this, meaning that decisions support the maintenance of other relationships, and promote consistency. This consistency would reduce the need for children and young people experiencing care from multiple foster carers and stop them being moved from their community and school if that is not in their best interests.

As stated above, a national register could help to align the interests of children and young people and foster carers better and ensure children remain with consistent caregivers in the local community. Careful thought and further exploration and consultation is required to ensure that these proposals are workable in practice.

Allegations

Should the Scottish Government update its guidance on managing allegations against foster carers? If yes, please explain what you'd like to see updated or added.

⁹ The Independent Care Review, the promise, Pg 77

What more can the Scottish Government do to ensure that allegations against foster carers are dealt with quickly and fairly?

Keeping children safe is the most important priority for everyone caring for children and young people. As with all members of the unpaid and paid workforce working alongside children and families, there must be a suitable accountability framework to ensure that children living with foster carers are safe and protected. The voices and experiences of children and young people must be taken into account when processes around managing allegations relating to foster carers are being assessed and developed.

This process needs to take account of the complex, and at times messy, relationships that exist in different families. In this context, accessible, high quality early help and support for families is key.

All processes must ensure that children's voices are central and that when children raise concerns about their carers they are taken seriously. This is particularly important when very young children and babies are concerned—there must be methods to pay attention to different types of communication so that even the very youngest children are heard.

Raising Concerns

Given their significant involvement in the upbringing of a child, foster carers are often well placed to highlight poor and unsafe practice in fostering, and child protection more generally or issues relating to the fostering services. Many foster carers already do that and are supported by fostering services and local authorities who have policies in place to support and encourage raising concerns without it adversely impacting upon the foster carers, or the care that is provided to the child.

Is there a need for the Scottish Government to take action in this area? If so, please explain why and what would be helpful, for example best practice guidance?

The Independent Care Review concluded that foster carers must be provided with adequate and appropriate support to ensure they are able to love and care for the children in their care. They must be seen as part of the broader workforce and as part of this change, the Scottish Government must ensure that they are able to raise concerns about children or about aspects of the system.

Foster carers must be listened to and taken seriously and offered opportunities to share their views and to offer feedback to ensure continuous improvement and accountability of the system. There must be mechanisms to ensure that foster carers understand what action has been taken once they have raised concerns and how they can contribute to reforming the existing system.

Wider issues

Is there anything not covered in the consultation which impacts on fostering that you would like to tell us about, or take action on? E.g. housing, poverty, etc.?

The Scottish Government's Programme for Government for 2024/25 restates its commitment to the importance of whole family support. The principles of effective whole family support apply to foster families as much as they do to any family, and it is vital that the new vision for foster care is taken forward in that context.

Please do not hesitate to get in touch with The Promise Scotland's Policy Lead, Chloe Riddell, with any questions or comments about this response: chloe@thepromise.scot