



Department
for Education

Reforms to unregulated provision for children in care and care leavers

Government consultation

Launch date 12 February 2020

Respond by 8 April 2020

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Introduction

The Department is seeking views on proposed new measures to ensure that the use of independent and semi-independent provision (commonly known as unregulated provision) provides the right level of support and does not place children in care and care leavers at risk.

Children in care and care leavers are some of the most vulnerable children and young people in society. Every child and young person should have access to a stable and secure placement in accommodation that can meet their needs and, most importantly, keep them safe. We need to work together to make this happen and deliver the support these vulnerable children and young people deserve.

The government is committed to ensuring that all care placements provide children and young people with the support they need. That is why we will review the care system.

Most children in the care system are placed in foster care or children's homes, which are regulated by Ofsted. A growing number of children, particularly older children and Unaccompanied Asylum-Seeking Children, are being placed in independent and semi-independent settings, which are not registered or inspected by Ofsted.

These placements form a vital part of the care system in meeting the needs of older children who are ready to live with an increased level of independence. However, we are concerned that independent and semi-independent settings are not always good enough, and that some children are being placed at risk and/or in settings that cannot meet their needs. We are particularly concerned that increasing numbers of children under the age of 16 are being placed in situations where either the provider is only offering support and not care, or care is being provided but the provider is operating illegally (an unregistered setting). It is unacceptable for any child or young person to be placed in a setting that does not meet their needs and keep them safe, for any amount of time.

Whilst there is a place for independent and semi-independent provision in the care system, to support young people to transition to living independently, it is clear that reform is needed to ensure it is being used appropriately and meets the needs of the young people placed there. The Department proposes new measures to do that and, through this consultation, is inviting views on proposed new measures and their potential impact. The proposed measures include:

- new measures to ensure that the use of independent and semi-independent placements for children and young people is appropriate, including ending the use of this provision for children under the age of 16; and
- introducing new checks and balances into the system to drive up the quality of provision, including national standards.

We want to bring about lasting change to ensure that children and young people get the support and care that they need. Working with the sector, this consultation is the start towards achieving that. We may begin implementing policy changes resulting from this consultation before the wider review of the care system has concluded. If this happens we would ensure that the findings inform the review.

Who this is for

- Children, young people and families with experience of care
- Local authorities
- Children's Social Care workforce
- Children's Social Care providers
- Relevant national public, private and charitable sector organisations
- Police

Issue date

The consultation was issued on 12 February 2020.

Enquiries

If your enquiry is related to the policy content of the consultation you can contact the team on 0370 000 2288 and ask for the Children's Social Care unregulated policy team.

or email:

CSCUnregulated.consultation@education.gsi.gov.uk

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the DfE Ministerial and Public Communications Division by email: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the [DfE Contact us page](#).

Additional copies

Additional copies are available electronically and can be downloaded from [GOV.UK DfE consultations](#).

The response

The results of the consultation and the Department's response will be [published on GOV.UK](#) in Spring 2020.

About this consultation

This consultation invites views on a range of proposed new measures to ensure that independent and semi-independent provision for children in care and care leavers is used appropriately and is of good quality.

We will use the findings of this consultation to inform future policy changes, to ensure that children in care and care leavers receive high quality care and support in settings that can meet their needs. These findings will be considered alongside the review of the care system, which the government has committed to.

Respond online

To help us analyse the responses please use the online system wherever possible. Visit www.education.gov.uk/consultations to submit your response.

Other ways to respond

If for exceptional reasons, you are unable to use the online system, for example because you use specialist accessibility software that is not compatible with the system, you may download a word document version of the form and email it or post it.

By email

- CSCUnregulated.consultation@education.gsi.gov.uk

By post

Sheila Shuttlewood
Department for Education
8th Floor
Sanctuary Buildings
Great Smith Street
SW1P 3BT

Deadline

The consultation closes on 8 April 2020.

Setting the context

Children in care and care leavers are some of the most vulnerable children and young people in society, and we must work together to do all that we can to ensure that they have access to suitable, safe and secure accommodation that can meet their needs and keep them safe. Having a high-quality form of provision for older children is becoming increasingly important as more older children come into the care system.

We set a high bar for the level of care that must be delivered in a children's home or by a foster carer. When local authorities place young people in 'other arrangements', offering independent or semi-independent provision (often referred to as unregulated or unregistered),¹ they are responsible for ensuring the placement provides the level of support that the young person needs.

Independent and semi-independent provision plays an important role in supporting young people to develop their independence and the use of it continues to grow. 6,180 looked after children were placed in this provision at 31 March 2019, a 19% increase from the same point in 2018.²

We are particularly concerned about increases in the number of children under the age of 16 being placed in this type of provision. There were 100 children under the age of 16 placed in this provision at 31 March 2019³; and that, while local authorities have local measures in place to quality assure the provision, the quality of the provision is variable, and does not always meet the needs of young people and keep them safe. We know that young people placed in this provision are more likely to go missing and can be particularly vulnerable to exploitation.

These issues were covered extensively in research which the Department commissioned last year, overseen by Sir Alan Wood, which has been published alongside this consultation document. This research, '[Use of unregulated and unregistered provision for children in care](#)' can be found on GOV.UK. Some of the key findings reported by local authorities in the research included:

- local authorities reported a clear distinction between 'planned' and 'unplanned' placements. Where placements are planned, they tend to be commissioned

¹ Unregistered settings are settings that deliver both accommodation and care, so should be registered with Ofsted, but are not, and are therefore operating illegally

² <https://www.gov.uk/government/statistics/children-looked-after-in-england-including-adoption-2018-to-2019>

³ <https://www.gov.uk/government/publications/looked-after-children-in-independent-or-semi-independent-placements>

based on the needs of individual children and local authorities have strong quality assurance regimes in place. Unplanned 'emergency placements' in independent and semi-independent provision are often 'spot-purchased' and therefore tend to have fewer quality assurance checks in place.

- there is a very mixed picture in the use of quality assurance regimes for providers, and local authorities report that overall quality of provision available is highly variable.
- there is some misunderstanding amongst local authorities as to what provision constitutes 'care' and should therefore be registered with Ofsted. This can lead to local authorities and providers inadvertently operating unregistered provision.

It is not in accordance with the legislation to place a looked after child in a setting that does not meet their needs and keep them safe, and it is unacceptable for any child or young person to be placed in such a setting. We therefore intend to take action to ensure this does not occur and are consulting on a range of proposals and their potential impact to ensure that the reforms we take forward are proportionate and have the desired effect, ensuring any unintended consequences are properly considered.

Our proposals include:

- banning the use of independent and semi-independent placements for children and young people under the age of 16;
- driving up the quality of support offered in independent and semi-independent provision, through the introduction of new national standards, and ensuring that young people's interests are appropriately represented by their Independent Reviewing Officer (IRO);
- introducing new measures so that local authorities and local police forces liaise before a placement in this provision is made; and
- giving Ofsted new legal powers to act against illegal providers.

It is clear that reform is needed to ensure that children and young people placed in independent and semi-independent settings are receiving the support they need. This consultation is an opportunity to inform how we do that. We want to work with children and young people, local authorities, social workers and providers to bring about lasting change that delivers the impact we need for our children.

Consultation questions

Appropriateness of placements

Every child and young person has different needs based on their age, background, experiences and interests. For looked after children, making the right placement decision is paramount in meeting their individual needs.

Different placements will be appropriate for different children and young people – there is no one size fits all. However, each placement must, at the very least, keep the child safe and provide them with the care and support that they need to achieve positive outcomes – local authorities have a duty to safeguard and promote the welfare of all looked after children. These points need very careful consideration, particularly when children and young people are placed in independent and semi-independent settings, given these settings are not subject to the same level of scrutiny as other registered settings.

We propose introducing new measures to ensure that placements in these settings are appropriate. We intend to:

- **ban the use of independent and semi-independent** placements for children and young people **under the age of 16**;
- introduce new measures so that **local authorities and local police forces** share information before an **out of area placement** in this provision is made; and
- **amend legislation to clarify the distinction between unregulated and unregistered provision**, so that local authorities and providers are absolutely clear about what is legal, and what is not.

Ending the use of independent and semi-independent provision for children under the age of 16

As children grow up and become young people, they gradually gain more independence from their parents. In line with the Children Act 1989, the care system seeks to replicate this with a transition to independence that begins at 16, when a young person could ask to leave care or to move to semi-independent accommodation. This form of provision can therefore be appropriate for older children where it is part of a carefully managed transition to independence as part of their care plan. However, an increasing number of children under the age of 16 are being placed in independent and semi-independent provision. While there is currently no age limit on placing a child in this type of provision, local authorities are under a duty to place looked after children in the most appropriate placements to meet their needs.

Many children in the care system under the age of 16 are very vulnerable and often have complex needs. We do not believe that independent and semi-independent

settings can meet all of these needs and therefore children of this age should not be placed in these settings under any circumstances.

We are therefore proposing legislating to ban the placement of children under the age of 16 in independent and semi-independent settings. This would prohibit the placement of under-16s in any setting that is not a regulated setting, such as a children’s home or a placement in foster care.

We know that local authorities can find themselves making difficult decisions to place children when there is an absence of available regulated placements, and that this can lead to children under the age of 16 being placed in independent and semi-independent settings temporarily, even where this is not deemed to be the best option in meeting the needs of the child. However, we must ensure that the standards and expectations for children are high, and that they are safe, and we do not think that children under 16 being placed in these settings is acceptable. We are keen to understand the potential impact of this change, especially on the placement market, and any implementation considerations.

1) Please set out any positive and/or negative impact you think this change would bring about, and the areas we should consider to ensure it is effectively implemented.

.....

As stated above, we have heard that local authorities are making difficult decisions to find the most appropriate placement to meet the needs of the child, and that the ideal placement is not always available, particularly in circumstances where children are first brought into care, or where placements have broken down and new ones have to be sourced quickly. In order to consider how the Department could possibly support local authorities with these issues, it would be helpful if respondents could share any examples they have of good practice in being prepared to deal with emergency placements.

2) Please share your examples of good practice here.

.....

Requiring local authorities to liaise with police forces when making out of area placements

One of the concerns that we have frequently heard is that the children and young people placed in independent and semi-independent settings are often already vulnerable to harm and exploitation and that these placements, sometimes far from their local area, increase the risk of them being subject to harm or exploitation. In some cases, the areas and settings in which these young people are placed are well-known to local police forces for criminal activity, which is a significant concern. We think that there

is a need for local authorities to share information with local police forces when they place children in these settings out of their local area.

We propose to introduce a new requirement for local authorities to liaise with the relevant police force when they place children in other local areas. This will ensure that the police can share any information they may have about particular providers or areas, in order for the local authority to make a considered judgement over whether to place that particular young person in that area and provision, including whether any additional support or monitoring should be put in place for the duration of the placement.

3) Do you agree that we should introduce a new requirement for local authorities to consult with relevant local police forces when they place a child out of area in independent and/or semi-independent provision?

Yes / No

4) Please explain your answer, including any positive and/or negative impact you think this change would bring about.

.....

Defining ‘care’ to clarify when ‘other arrangements’ may be used by local authorities and to clarify the distinction between ‘unregulated’ and ‘unregistered’ provision

Local authorities are able to place looked after children in ‘other arrangements’ which are arrangements that are not with a parent, person with parental responsibility for the child, foster placements or children’s homes. These ‘other arrangements’ are described as unregulated provision and this term is often used to describe provision that is not registered and inspected by Ofsted i.e. independent and semi-independent provision.

Most of this provision is entirely legitimate. It is provision that offers accommodation (wholly or mainly for children) only, usually with some level of support. This type of accommodation does not deliver what Ofsted considers to constitute ‘care’ under the Care Standards Act 2000. This provision was intended for older children ready to live with the level of independence that these settings afford, and local authorities are required to ensure that settings are suitable, in accordance with the legislation and statutory guidance.⁴

⁴ The Children Act 1989 guidance and regulations. Volume 2: care planning, placement and care review.

Any setting that provides care as well as accommodation, and meets the other requirements in the Care Standards Act 2000, must be registered as a children's home. It is a criminal offence to carry on or manage an unregistered children's home.

Through our research, local authorities often reported, or demonstrated, limited clarity on what constitutes 'care' and therefore which settings should be registered with Ofsted. Some of the examples of settings and provision shared by local authorities should be registered with Ofsted as they are providing 'care and accommodation wholly or mainly for children' but were not registered.

Instead they were being used by local authorities as independent or semi-independent settings. In some cases it appears that the placements start out as placements which don't require registration but, over time, the level of support being provided to the child increases to what Ofsted would consider to be 'care' bringing them within the Care Standards Act definition and requiring the setting to be registered as a children's home. Where this occurs, the provider is operating an 'unregistered' illegal setting.

At present, there is no definition of 'care' which would take its ordinary meaning. It is not clear whether what constitutes 'care' might differ by age group, whether the child has special needs, medical conditions or disabilities, or any other factor. Some local authorities have told us this can be unhelpful, particularly for older children, and that they would welcome greater clarity, to prevent the risk of inadvertently placing a child in a setting which would be operating illegally in accommodating and providing 'care' for the child.

We propose amending legislation and the associated statutory guidance to make it clearer when a setting is providing 'care' and to bring clarity on what the difference between 'unregulated' provision and 'unregistered' provision is.

5) Do you agree that we should amend legislation to define 'care', in order to provide clarity on what amounts to 'other arrangements' i.e. 'unregulated' provision, and what constitutes 'unregistered' provision?

Yes / No

6) Please explain your answer, including any positive and/or negative impact you think this change would bring about.

.....

Beyond the proposed changes above, we would find it helpful to receive additional suggestions on where we might go further to ensure that the placement of children and young people in independent and semi-independent provision is appropriate, keeps them safe, and meets their needs.

7) Do you have any suggestions for areas where we might go further? In making your suggestions, please provide any supporting evidence or information you have.

.....

Checks and balances in the system

To get the best possible start in life, children and young people need good quality provision that, as an absolute minimum, meets their needs and keeps them safe. At the moment, while we know local authorities often have local regimes in place to assure the quality of provision they use, this is inconsistent and there is no shared understanding of what good quality provision for older children looks like. To ensure that independent and semi-independent settings are appropriate and high quality, we want to improve the checks and balances in the system.

We intend to:

- introduce **new national standards** for providers of independent and semi-independent provision (and we are consulting on how these should be enforced) setting a quality benchmark and giving local authorities more assurance that provision will meet the needs of young people.
- **strengthen statutory guidance for Independent Reviewing Officers (IRO)**, to ensure that requirements on IROs are clear, including visiting every child or young person in an independent and semi-independent setting.
- **increase Ofsted's enforcement powers**, so that robust action can be taken quickly where providers are found to be acting illegally.

National standards for providers

Quality of provision is crucial – we will not tolerate poor provision that fails our most vulnerable children. In order to improve standards and make it easier for local authorities to assess the quality of provision, we propose introducing new national standards for providers of independent and semi-independent accommodation. We are also consulting on how these standards should be enforced – either by mandating local authorities to only use providers that meet the standards, or by legislating to introduce a new quality and inspection regime similar to the regime already in place for children's homes.

Independent and semi-independent provision has an important role in supporting young people towards independence. There are currently no shared standards for independent and semi-independent provision. While high quality provision exists, the absence of shared standards leaves too much room for poor provision that does not meet the needs of young people.

New national standards will ensure that the provider market is working to a shared understanding of what is expected of them in terms of a minimum level of service, and help local authorities identify placements that can meet the needs of young people in their care. Most importantly, national standards will drive up the quality of provision for children and young people, keeping them safer, and delivering better outcomes.

The proposed national standards will not seek to:

- curtail the flexibility of providers to offer high quality, bespoke packages of accommodation and support in addition to the minimum, or to set a higher standard when recruiting staff to deliver bespoke services;
- determine whether a specific setting is suitable for, and meets the needs of, a particular young person; this assessment must always be made by the placing local authority; or
- prevent local authorities from setting their own additional requirements of providers before placing young people in a setting.

Learning from the standards that are already in place for children's homes⁵, we think there are four broad standards that are applicable to independent and semi-independent settings. These are set out below.

Given the nature and purpose of these settings, and the level of support provided within them, we do not think that the standards for independent and semi-independent settings should be as prescriptive as those that are in place for children's homes, to ensure providers and local authorities retain flexibility in how best to meet the individual needs of older children, who will require very different levels of support dependent on the age, backgrounds and experiences. Instead, the proposed standards focus on setting out a minimum level of service to be provided to all young people in these settings.

The proposed areas to form new national standards are below. These are not intended to be final or exhaustive at this stage but seek to set out the broad areas that the standards would cover. In response to the consultation, we will work closely with the sector to design the specifics of the new national standards before implementing them. This will include considering other national standards and how they should align. As set out in the next section, we will also consider how the standards should be enforced.

The purpose and intent standard

This standard would set out that every setting should have a published statement of purpose setting out:

- how it meets the national standards;
- the level of support the setting provides;
- the young people the setting is equipped to accommodate; and
- how it meets their needs.

⁵ Guide to the Children's Homes Regulations including the quality standards – April 2015

Every setting should make clear that it cannot provide 'care and accommodation wholly or mainly for children' as it is not registered as a children's home, and set out expectations on the maximum age and presenting needs of young people age 16 and over it accommodates.

Every setting should make clear what their approach is to emergency placements, whether these are offered, and how these are managed by the setting.

The standard would set out minimum requirements on the level of service settings provide to support young people, and how they work with local authorities and other services to ensure that the needs of the young person are met, as set out in their care plan.

The quality of accommodation standard

This standard would set out the accepted types and minimum requirements for accommodation and buildings, including:

- the living space in which young people are accommodated, and the furnishings and fittings expected;
- the services and facilities available in the setting;
- the state of repair of a setting, and health and safety requirements, for example, gas and fire safety checks and other regulatory requirements;
- clear expectations of who is responsible for maintenance and upkeep of the setting;
- security and safety of settings; and
- the provision of physical support for young people with disabilities.

The support standard

This standard would ensure that settings have all of the provision in place to deliver on the statement of purpose they have set out and would ensure settings set out how they will support young people to:

- access education, employment and training;
- maintain positive relationships and facilitate the provision of any extra support they receive from e.g. their local authority;
- access other local services they need, e.g. local GPs, dentists and mental health services;
- move towards independence and ensure that they have continued access to and support from services; and
- access to advocacy services.

Settings must provide information to young people and placing local authorities outlining their welfare support, financial advice and other services on offer at or through the provider.

Settings must provide young people with access to appropriate advocacy support. Looked-after children are entitled to an independent advocate and where possible this should be provided by a person they choose. The advocate should advise them and ensure they have the support needed to express their views, wishes and feelings about the services they receive, including pursuing complaints.

The protection of children and young people standard

This standard would make clear what is expected of settings and providers in the protection of young people from safeguarding and health and safety risks.

There should be a workforce plan which would set clear expectations on the employment and recruitment of staff, managers and supervisors of provision, including:

- a requirement for every person involved in delivering any form of service to young people having undertaken an enhanced DBS check;
- all managers and supervisors of services to have undertaken a 'fit and proper persons' assessment;
- the necessary management and staffing structure, (including any staff commissioned to provide health and education), the experience and qualifications of staff currently working within the staffing structure and any further training required for those staff;
- the processes and agreed timescales for staff to complete induction, probation and any core training (such as safeguarding, health and safety qualifications);
- the process for managing and improving poor performance; and
- the process and timescales for supervision of practice and keep appropriate records for staff in the home.

The plan should be updated to include any new training and qualifications completed by staff while working at the home and used to record the ongoing training and continuing professional development needs of all staff.

All settings would be required to have policies and procedures in place to protect young people from abuse, neglect, exploitation, and other risks that may cause young people harm, and have procedures in place for reporting concerns for the welfare, wellbeing or safety of a young person to the relevant local authority. Where incidents do occur providers must have policies and procedures in place for informing all of the relevant authorities, such as local authorities and the police. The standard would set out a series of incidents that would warrant action in this regard, including children going missing.

The provider's policies and procedures around the protection of children should reflect

any requirements of other relevant legislation.

8) Please set out any positive and/or negative impact the introduction of new national standards would have

.....

9) Please set out any other areas you think should be covered in the new national standards

.....

Status of national standards

We propose developing the new national standards closely with the sector. Once agreed, we will publish them.

Through this consultation we are inviting views on how we might implement the standards. We are currently considering ways of doing this and welcome views on how best to do this to raise the quality of provision:

1. Changing the regulations, to make the standards mandatory for local authorities: We would require local authorities to only place children in provision that meets the standards. This would enable Ofsted to assess local authorities on their use of independent and semi-independent provision, and compliance with the requirement to only place with providers who uphold the standards, under the Inspection of Local Authority Children’s Services Framework. Under this option, Ofsted would not register and inspect providers.
2. Legislating to introduce a new quality and inspection regime: This would require all providers of independent and semi-independent provision to register with Ofsted and be inspected against the new standards, and these could be established, through legislation, as National Minimum Standards, as defined under section 23 of the Care Standards Act 2000. The framework and associated standards would differ from the ones in place for children’s homes, reflecting that the nature of this provision is different, though the regime for registration and inspection would be similar. Local authorities would be required to place children in provision which is registered with Ofsted, and Ofsted could take enforcement action against providers that do not meet the standards.

Under both proposals, there would be a grace period to enable providers and local authorities to prepare for any new regime coming into effect. We would expect that providers would begin to voluntarily implement the new standards during this grace period to support an effective transition to any new approach.

10) How effectively do you think either option 1 or 2 would raise the quality of independent and semi-independent provision?

Not at all/ a little/ no change/ a lot/ very

11) Please explain your answer, including why the options would be particularly effective or ineffective.

.....

12) Please set out the consequences and implementation challenges that should be considered when introducing new standards?

.....

Independent Reviewing Officers

Independent Reviewing Officers (IROs) were introduced to check that children’s needs are met and local authorities are meeting their duties, offering challenge where they are not. They have an important role to play in scrutinising local authority decisions, particularly around changes of placement, and can request reviews as well as refer matters to the Children and Family Court Advisory and Support Service (CAFCASS) if needed.

IROs provide an independent assessment of the suitability of placements and if they have a concern about a placement, they should raise this with the local authority who should act to address it. This role can be vital in ensuring that young people are getting the support they need.

Whilst this already happens effectively in some places, it is inconsistent and the IRO role is not always as effective as it could be. To ensure that this key check and balance is working effectively we are proposing to make changes to statutory guidance to ensure it is clear that IROs **should undertake a visit to a placement to be able to assess whether it is meeting the needs of the child or young person, and that this report must be sent to the local authority to inform their decision making process about next steps for the individual child or young person.** This would sit alongside the work we are already undertaking to deliver our commitment in *Fostering Better Outcomes* to improve IRO effectiveness.

Ofsted already consider IRO effectiveness in local authority inspections. We will therefore work with Ofsted to ensure they are looking at IRO scrutiny of placements as well as local authorities’ responses to concerns raised as part of local authority inspection.

13) Do you agree that we should clarify statutory guidance, to ensure that IROs undertake visits to a placement to be able to assess whether it is meeting the needs of the child or young person and that they must send a report to the local authority to inform their decision making process about next steps for the individual child or young person?

Yes / no

14) Please explain your answer

.....

Ofsted powers

Some independent and semi-independent providers are operating settings illegally, usually by providing care and accommodation wholly or mainly for children, but not being registered. This is not acceptable. Where Ofsted find provision is operating illegally, they take action, but their powers are limited to prosecuting providers, and they have no powers for earlier intervention.

We propose to increase Ofsted’s enforcement powers. We would amend legislation so that Ofsted have a legal step before prosecution to issue enforcement notices, replacing their existing ‘cease and desist’ letters, so that their action has more bite. This should see illegal providers being either forced to close quickly, register their service, or face some form of penalty, as well as reducing the appeal of setting up such provision. Ofsted would publish details of all providers that have been served with an enforcement notice, and local authorities not to use any providers listed.

Ofsted would retain their power to prosecute providers. In implementing this proposal, we would work with Ofsted to develop a framework for determining under what circumstances Ofsted would proceed immediately with a prosecution or issue an enforcement notice.

15) Do you agree that we should legislate to give Ofsted powers to issue enforcement notices to illegal unregistered providers before proceeding with prosecutions?

Yes / no

16) Please explain your answer

.....

Next steps

We want to take decisive action to ensure that independent and semi-independent provision meets the needs of the young people who are placed in it. In taking this action, we want first and foremost, to listen to the views of children and young people placed in this accommodation and their families. We are also keen to hear views from others with an interest, including from:

- providers of this provision;
- social workers who make the risk based assessments to place these children in this provision;
- the IROs who have a key role in ensuring the children and young people's needs are being met; and
- local authorities that have the statutory responsibility to meet children and young people's needs.

This consultation is an opportunity to shape our proposals and next steps in terms of what and how we might implement the proposals. Following the consultation, we will consider the responses received and publish a response which will include a timetable for any reforms that will be taken forward.



Department
for Education

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