irm independent review mechanism ENGLAND

Independent Review Mechanism

Annual report 2025 to 2026

April 2026

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Summary

The Independent Review Mechanism (IRM) was established under the Adoption and Children Act 2002 and subsequent regulation, began operating in 2004 and is now in its 22nd year of operation. The IRM has been holding independent reviews for applications for adoption since 2004 and for fostering since 2009.

The IRM is responsible to the Secretary of State for Education for reviewing Qualifying Determinations (QDs).[1] The QDs made by a fostering service provider (FSP) or an adoption agency (AA) cover a number of different areas:

- An individual's suitability to foster or adopt
- The terms of approval for foster carers, where the fostering service wish to change the terms and the foster carer is not in agreement
- Applications to receive information from adoption records.

The IRM does this by holding independent review panels. The panel reviews the proposed decision, using information provided by all parties and providing a fresh recommendation, with reasons, to the agency decision maker to assist them in making their final decision.

For applicants, the IRM provides them with the opportunity to have their case independently reviewed and to ensure that any information that they feel was not properly considered by their agency is looked at by the independent panel. For agencies, it supports their responsibility to foster carers and adopters to operate within the framework of adoption and fostering regulations and guidance.

The Review Panel can provide feedback to the agency on its policy, practice and procedure and any learning the panel thinks would be helpful for them to consider from the case. This is an important quality assurance function which benefits both applicants and agencies.

[1] A Qualifying Determination (QD) is a letter from an Agency Decision Maker (ADM) indicating that they are minded to make a final decision. The letter sets out the reasons for that decision and the options available, including the right to apply to the IRM for an independent review.

As the IRM operates throughout England, it has a window into fostering and adoption practice across the country. This provides an opportunity to identify and share information with all those interested in fostering and adoption services in England about issues and challenges that have been identified through the IRM's work.

The IRM is delivered under contract to the Department of Education by Coram Children's Legal Centre (CCLC). The IRM is partially funded by the Department for Education, this funding is supplemented by a £2,591 contribution to each case from providers whose decisions are reviewed by the IRM panels. This contribution is a regulatory requirement with payments based on a sliding scale should a case be withdrawn. [2]

[2] The Independent Review of Determinations (Adoption and Fostering) Regulations 2009 (legislation.gov.uk)

Overview of service

The IRM received 119 applications in the year to the end of March 2026.

- 117 fostering applications, of these 34 were from connected persons
- 2 adoption applications

The IRM accepted 116 applications in this period, 114 regarding fostering and 2 regarding adoption. There has been a small increase in connected person applications this year: 21 were made following a full assessment; 5 following a brief assessment and 8 were regarding ongoing suitability.

Adoption applications have reduced once again, with 3 in 2024-2025, reducing to 2 in 2025-26. Of the 2 applications, 1 followed a full assessment and 1 focused on ongoing suitability. This is the third consecutive year that the number of adoption cases has reduced, although the numbers are consistently low.

There were 17 cases withdrawn following an application being made. These were all fostering applications. This is a slight increase from the previous year. One fostering case became ineligible following the resignation of the carers from fostering and 1 adoption case was refused as it was made outside of the timescale specified in regulation.

The IRM panels reviewed 103 cases during 2025-26. This is an increase of 15 from the previous year. It should be noted that some accepted applications will not be reviewed until the following reporting year.

How the IRM operates

The IRM is a digital service which reflects the need for it to be accessible, cost efficient and being mindful of its environmental impact. Panels are held virtually, and the application process is electronic, though adjustments can be made for additional needs and a face-to-face panel could be offered in exceptional circumstances to meet a specific need. However, no face-to-face panels have been required this year.

The digital service provides communication that is fast and cost effective and reflects the digital world within which the IRM operates.

Virtual panels give improved accessibility for applicants and agency representatives. It reduces costs for applicants and agencies as well as removing the stress of travel and potential delays. The virtual nature of panels does not appear to have had a negative impact. For example, the IRM continues to make reasonable adjustments for applicants where English is not their first language, including those where British Sign Language (BSL) is their first language and by allowing additional time and breaks for those with a learning need. The adjustments inevitably impact on the length of the panel meeting.

Virtual panels have the additional benefit of increasing the flexibility of panel dates and the ability of panel members to attend. It is also easier to arrange an additional panel at short notice if required. Panel dates are set well in advance, with each panel only hearing one case. Two panels are usually held in a day. Unfortunately, due to unforeseen circumstances, cases do, on occasion, need to be postponed or withdrawn and it is not always easy to slot new ones into these panels. The busiest month for the IRM in this period was March 2026, when 14 panel meetings were held.

All IRM staff are home based. The IRM no longer has an office but continues to operate a Post Office box for the limited mail it receives. An IRM caseworker is available to take calls when the phone lines are open (weekdays 9.30 to 12.30). The IRM team meets both virtually and face to face.

Panel members participate in an annual appraisal process and attend ongoing training. In this period panel members have completed training on the role of the local authority designated officer, with particular reference to adoption and fostering and unconscious bias training.

Cyber attack

The IRM was the subject of a cyber-attack in the Summer of 2025. The hacker was able to access some information held on the affected IRM server. An investigation showed that it was not possible to determine which files were affected. However, the IRM worked on the basis that all information was potentially compromised. Each file was considered individually to ascertain what personal information it contained in order to assess any potential risk. Those potentially affected were also informed.

The cyber-attack was not the result of any negligence or lack of vigilance on the IRM's part. Security protocols were followed and all data was contained and secured. The incident was reported to the Information Commissioner's Office (ICO) and the Department for Education (DfE) who fund the IRM service. IRM is not considered to have been at fault. The ICO closed the case in late October 2025 and the DfE confirmed closure of the IRM data incident in January 2026. Applicants were given details of services available should they find unauthorised activity with regard to their personal information. There were no applications withdrawn as a result of the data breach, and the service continued to operate as usual throughout this period.

Fostering activity in 2025 to 2026

Activity in fostering has remained constant, with 117 fostering applications in this reporting period. Of these 117 applications, 83 were from mainstream carers and 34 were from connected persons. These figures are very similar to the previous year.

The IRM responded to a further 50 enquiries from potential applicants and fostering service providers (FSPs). Some of these later turned into applications but others were “standalone” enquiries or requests for advice. The enquiries covered a range of different topics including:

- what potential adopters or foster carers could do when they were told that they would not receive a positive recommendation from the approval panel, but they did not wish to withdraw their application
- from applicants who wished to complain about their fostering service provider, rather than make an application to the IRM
- what options were available if foster carers had resigned but were still being taken through a formal deregistration process
- options available to applicants when their assessment was stopped at stage 1
- timescales for applications and if an application would be accepted, which is outside of the timescales set in the regulations
- concerns about processes not being followed by fostering service provide
- from family members or friends who are supporting an applicant and want to help them consider the options available to them.

3 applications were not accepted for the following reasons:

- 2 of the applications were outside the regulatory time scales for making an application to the IRM
- 1 applicant decided to resign from fostering.

Seventeen applications were withdrawn for various reasons as set out below. This is an increase from 2024-25 when 12 applications were withdrawn but a decrease from 2023-24 when 19 cases were withdrawn. Reasons include:

- Applicants (Connected Person) obtained court orders for the children in their care
- The deterioration in health of the applicants
- The fostering service provider withdrew their qualifying determination (QD) and further assessments were to take place to assess the suitability of the carers
- Applicant decided to work with their fostering service provider
- Decided to make a complaint about the fostering service provider in instead
- Withdrawn by the IRM as the applicants did not respond to contact made by the IRM.

Types of application

- 6 applications followed a full assessment of suitability to foster
- 1 application followed a brief assessment of suitability to foster
- 76 applications related to the ongoing suitability of approved foster carers
- 21 applications were from connected persons seeking assessment to care for specific children
- 5 applications were from connected persons following a brief assessment
- 8 applications were from connected persons regarding their ongoing suitability to foster.

Of the 114 applications accepted during the reporting year, 65% were from Local Authorities and 35% were from independent fostering providers (IFPs). Children's Trusts are included within the Local Authority category for reporting purposes. This represents an increase in the proportion of accepted applications from Local Authorities, from 56% in 2024-25 to 65% in 2025-26.

IRM panels and outcomes

The constitution of panels is set out in the IRM Regulations 2009 (as amended), which specify that panels must include

- social workers
- individuals with experience of fostering and adoption, such as care-experienced people or foster carers
- health professionals and, where there are medical issues, registered medical practitioners.

Preparation for panel meetings is undertaken by the IRM team. Each application is allocated to a caseworker, who is a registered social worker, responsible for ensuring that panel members have all the information they need to consider the case as fully as possible. Caseworkers work closely with a designated legal adviser to prepare cases for review. The legal adviser is also available by telephone to provide advice to the panel while it is sitting.

Where relevant, the caseworker may seek advice from a medical adviser. The medical adviser will provide written advice to the panel and may sit on the panel where this is considered appropriate. The number of panel members varies depending on the type of application being considered. Where suitability to foster or adopt is being assessed, the minimum number of panel members is 5 in addition to a panel adviser and panel secretary.

On average, panels are comprised of 7 members. For virtual panels, one panel member acts as the ‘host’, managing the technical and administrative aspects of the meeting.

IRM panels heard 103 fostering cases in the year ending 31 March 2026, the majority of which concerned the on-going suitability of mainstream foster carers.

The IRM panel made a different recommendation from that of the originating agency in 14 cases. This represents an increase from 10 cases in 2024-25.

The ADM disagreed with the IRM panel's recommendation in 7 cases. The reasons for this include:

- The Connected Carers no longer had the children living with them and no other children would be suitable.
- The Decision Maker remained concerned about the ability of the carers to work with professionals and was not confident that additional support would be effective (this was a factor in a number of cases).
- The Decision maker remained concerned about the carers ability to work in an open and transparent way with the agency (this was a factor in a number of cases).
- Continuing concerns regarding home conditions and failing to meet the national minimum standards.

In 7 cases, the ADM agreed with the IRM panel recommendation and overturned the qualifying determination (QD). All of these cases concerned mainstream foster carers.

Demographics

The IRM identifies applicant and agency geographical locations for reporting purposes. All other information is given voluntarily by applicants who chose whether or not to provide it.

Geographical locations

These provide insight into those that access the service. The applications received were from a spread of geographical areas:

Location	Number of applicants
East	6
South West	10
North West	18
North East	16
Central	33
South East	18
London	18
Wales	0
Other	0

The majority of applicants are located within the same area as the agency with a small number of connected persons located in different areas to their agencies.

Relationships (applications)

From the information received for accepted applications (some applicants do not provide information):

Relationship status	Number of applicants
Single Male	5
Single Female	28
Married	53
Partnership/Civil Partnership	12
Widow	1
Widower	0
Separated	1
Divorced	0
Other	1

Sexuality (as defined by applicants)

Sexuality	Number of applicants
Not Provided	6
Heterosexual	86
Lesbian	1
Gay	2
Undecided	1
Other	3

Ages

The age profile of applicants was concentrated among older age groups. The largest proportion of applicants were aged 55-59 (25 applicants), followed by those aged 45-49 (20 applicants). Overall, 71% of applicants were aged 45 or over, while fewer than one in ten applicants were under the age of 35. Applications were received across a broad age range, although numbers declined among applicants aged 70 and above. Age range is calculated per household, however, if the household has 2 applicants with the same age only one person's age is included.

Age range	Number of applicants
18 - 24	1
25 - 29	3
30 - 34	8
35 - 39	8
40 - 44	11
45 - 49	20
50 - 54	14
55 - 59	25
60 - 64	16
65 - 69	16
70 - 74	5
75 - 79	3
80+	0

Ethnicity

In this reporting year, the majority of applicants were White British, with the next largest groups identifying as Black British/Caribbean and Asian British/Pakistani.

National Statistics on fostering indicate that 20% of foster carers are from non-White ethnic backgrounds. Among applicants to the IRM who provided ethnicity information, 33.6% were from non-White ethnic backgrounds. This is a notable increase compared with 23.8%% in year 2024-25.

Ethnicity	Number of applicants
White - British	61
White - Irish	2
White - Other	8
Asian / Asian British - Indian	4
Asian / Asian British - Pakistani	8
Asian / Asian British - Bangladeshi	2
Asian / Asian British - Other	4
Black / Black British - Caribbean	10
Black / Black British - African	3
Black / Black British - Other	0
Chinese	0
Mixed - White & Black Caribbean	1
Mixed - White & Black African	1
Mixed - White & Asian	0
Mixed - Other	1
Other	1
Black / Black British - African Caribbean	1

Religion

Religion	Number of applicants
Not Provided	6
No Religion	25
Christianity	52
Islam	11
Judaism	0
Buddhism	1
Hinduism	1
Sikhism	2
Mormon	0
Agnostic	0
Other	1

Additional vulnerabilities

In 20 cases, applicants disclosed additional vulnerabilities, and appropriate arrangements were made to support their full participation in the IRM panel process. The most commonly identified needs included English not being the applicant’s first language, dyslexia, and neurodivergence. This represents an increase from 2024-25, when additional vulnerabilities were identified in 15 cases.

Adoption activity in 2025 to 2026

Adoption activity continues to be small and has reduced further. There were 2 adoption applications this year, a reduction from 3 in 2024-25 and 5 in 2023-24. The IRM responded to a further 9 enquiries, mainly from potential applicants.

IRM panels and outcomes in adoption

Only 1 case has been heard in this period, as the second application has yet to be heard at panel.
Further information is not being provided on this case to ensure confidentiality of the applicant and agency.

Applications received per month over the last 3 years

The figures below demonstrate that applications do not seem to follow any kind of regular pattern and vary from year to year. These numbers represent the numbers of applications and do not represent the numbers of accepted applications as discussed above.

	2025-2026	2025-2026	2024-2025	2024-2025	2023-2024	2023-2024
	Fostering	Adoption	Fostering	Adoption	Fostering	Adoption
April	9	0	13	0	10	2
May	4	0	10	0	11	0
June	9	0	7	1	11	1
July	13	1	11	0	5	0
August	17	0	3	0	10	2
September	5	0	8	1	7	0
October	4	0	6	0	8	0
November	12	0	12	0	10	0
December	12	0	10	0	8	0
January	7	0	13	1	8	0
February	13	0	13	0	6	0
March	12	1	12	0	14	0
Totals	117	2	119	3	108	5

Common themes

There are a variety of reasons for applications being made to the IRM. However, there are some common concerns from fostering providers when making their qualifying determination. These include:

Inability to understand the role of foster carer or adopter and to maintain appropriate boundaries and standards	36%
Inability to meet/understand the needs of a looked after child	24%
Safeguarding concerns	12%
Inability to work in partnership with the FSP	24%
Issues relating to current and historical personal and family circumstances	9%
Physical and mental health issues	8%
Drug and alcohol concerns	1%

Applications may be categorised under more than one theme; therefore, the percentages shown may exceed 100%.

There continue to be challenges caused by the variable quality of qualifying determinations (QD) and final decision letters and what they should contain. A number of agencies continue to fail to provide copies of final decisions (despite this being a regulatory requirement) which results in ongoing contacts, sometimes over several months, to ensure that process has been followed and the outcome recorded.

The IRM sends guidance information about the final decisions with the minutes to support this process, but it is crucial that the agency liaison passes these onto the decision maker. In some cases, the agency does not provide clear reasons for both the QD and the final decision. Some agencies offer an excellent service and provide applicants with the information they need in a way that they can understand. They relate to applicants as individuals, rather than simply listing the national minimum standards that have not been met without explaining how those standards have not been satisfied.

Concerns about foster carers' understanding of the needs of children in care continue to feature in cases considered by the IRM, although this has decreased by four percentage

points since 2024-25. While agencies provide preparation and training for the fostering role, these findings highlight the importance of robust preparation, ongoing training and support to help foster carers meet the often-complex needs of children in care.

Delay in agencies responding to allegations in a timely way continues to be a theme in applications. Insufficient monitoring of practice concerns and allegations means that issues are sometimes dealt with in isolation rather than identifying an emerging pattern over time. This issue is particularly important when applicants then choose to move to another agency, as previous concerns can be overlooked.

Agency practice could be strengthened through more effective use of the annual review process and fostering panel oversight. This would provide opportunities for the agency and foster carers to identify areas for development, agree clear and achievable short-term objectives, and review progress regularly. By working together to address concerns at an earlier stage, agencies can better support carers to maintain the required standards and to prevent the need for de-registrations. This approach is likely to lead to better outcomes for both foster carers and agencies.

In many cases a breakdown in the professional relationship between the foster carers and the agency is a factor highlighted in the QD. This often stems from issues related to understanding the role of foster carers. However, in some cases when the carers have been able demonstrate suitable reflection and learning the ADM has reversed their original QD and made the decision in favour of the carers. This highlights the importance of ongoing partnership working, communication and support for foster carers This will allow any concerns identified to be addressed in a timely manner and before they escalate.

There continues to be confusion in some agencies about the status of applicants after a QD has been issued. The foster carers remain registered at this point and until a final decision is made, although some agencies inform the foster carers incorrectly that they are no longer registered foster carers. This is confusing and stressful for applicants.

There is also some confusion about the role of the IRM. A number of initial enquiries from foster carers relate to complaints about their fostering agency, and these enquirers are directed to the appropriate complaint procedures. The IRM's remit is limited to considering the suitability of applicants or the terms of their approval, as set out in the relevant

regulations, and it does not investigate complaints about agencies. Depending on the nature of the complaint, applicants may wish to pursue their concerns through their agency's complaints process or, where appropriate, through the Local Government and Social Care Ombudsman. The IRM provides applicants with the opportunity to have their case considered afresh by a wholly independent panel. Applicants may make a complaint to their agency and apply to the IRM simultaneously.

There has been an increase in applications that involve concerns about the health of the foster carers. This has increased by 4 percentage points from 2024-25, resulting in more cases requiring the involvement of the IRM medical adviser seeking further specialist advice. Regulations do not provide clear guidance to agencies regarding the frequency of medical reviews, resulting in significant variations to practice.

There continues to be a variation in the availability of documents for sending to the IRM panel. When an application is accepted for an IRM review panel, the agency needs to provide all the documents that their panel considered together with any additional documents considered by the agency decision maker in reaching the QD. Agencies need to ensure that any documents presented to their panel will be able to be sent to the IRM should an application be made, this is particularly relevant for documents containing confidential information, for example those from the Local Authority Designated Officer (LADO).

There has been a small increase in the number of connected carers applications in 2025-26 being 34 applications. Ofsted national statistics for fostering for the year ending 31 March 2025 indicate that 21% of foster carers are connected carers, while applications to the IRM from connected carers makes up 29% of the fostering applications made, so is disproportionally high.

Sharing learning

The IRM has continued its work over the past year to raise awareness of its role, share information about how it operates, and highlight emerging themes from applications. Several webinars have been delivered for agencies to increase understanding of the IRM and its processes. The IRM intends to continue this engagement in the coming year and has already scheduled further events with stakeholder organisations.

The IRM has continued its involvement in the Ofsted Social Care National Consultative Forum and its fostering and adoption sub-groups, which bring together key sector representatives and provide opportunities to discuss practice and development.

The IRM continues to hold a list of stakeholder / agency contacts and uses this to circulate information, including the IRM updated information sheets and those about Qualifying Determinations and Final Decision letters, as well as giving information about the webinars that are offered.

Complaints, concerns and compliments

There was a significant increase in complaints during the year, largely as a result of the cyber-attack and subsequent data breach. A total of 22 complaints were received, of which 21 related to the data breach and one concerned information shared by the agency.

The IRM offers applicants, representatives and supporters who attend panel meetings the opportunity to provide feedback on their experience through a questionnaire. This feedback is used to inform practice and improve processes, helping to ensure that the service continues to meet the needs of its users

The IRM uses an online link which is provided to applicants, agency representatives and supporters.

Virtual panels are viewed as positive by all involved.

Examples of positive feedback

“All staff were very polite and knowledgeable.”

“Staff were all fantastic, polite explained the process well and clearly.”

“Very professional supporting team made me feel like I was being heard. Helped deal with my questions with great clarity.”

“Lots of information was received and kept informed of what was going to happen.”

“I was treated with respect and kindness.”

“It was a well-planned and organized meeting that allowed all individuals to make their points. I thought the process of how questions asked was something I will take way to discuss with our own panel when managing complex panel meetings.”

“I liked that they listened, were neutral and repeated questions and gave time to talk it through as some of the questions were complex and broken down into different parts. I also liked the focus on strengths.”

“We found it a positive experience and felt the panel had prepared appropriate and pertinent questions to both the applicants and the agency.”

Suggestions for improvement

“It would be helpful to understand the criteria used by the IRM when accepting a case, as from our perspective this appeared straightforward.”

“More time needs to be allocated.”

“We had no verbal communication with IRM staff, despite being informed that we would have a case worker who would communicate with us. This did not occur, and we feel that more direct contact would have been helpful in preparing us and clarifying expectations.”

“We were advised to prepare for a meeting lasting up to four hours. However, the meeting ran only for only 1 hour 20 minutes.”

The IRM values feedback from applicants, representatives and supporters, recognising it as an important source of learning and service improvement. Feedback is regularly reviewed to identify themes, highlight good practice and understand where processes or communication could be strengthened. This commitment to listening to service users helps to ensure that the IRM remains transparent, responsive and focused on providing a fair and accessible service for all applicants.

Feedback received from panel members

In this period the IRM has also formalized the feedback from panels regarding the reports presented to it. This includes the legal advice from the IRM legal adviser, which is always well received. Positive comments include:

“The legal report was very detailed and helped panel to focus on the key issues”

“The legal report highlighted the key points and was set out in a structured manner.”

Some other comments refer to duplication of documents and the manner in which documents have been uploaded for panel members to read, making it more difficult. Learning has been taken forward from this feedback.

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