

By email: [socialcare@ofsted.gov.uk](mailto:socialcare@ofsted.gov.uk)

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## **ADCS response to Ofsted's consultation on changes to the joint inspections of secure training centres**

1. The Association of Directors of Children's Services Ltd (ADCS) welcomes the opportunity to respond to the proposed updates to the joint inspections of secure training colleges (STCs). ADCS is the professional leadership association representing directors of children's services and their senior management teams in local authorities across England. Under the provisions of the Children Act (2004) the DCS acts as a single point of leadership and accountability for services for children and young people in a local area.
2. Since the airing of the 2016 documentary on the use of excessive force by Medway STC staff against the boys in their care, concerns about the health, safety and welfare of children and young people who have committed crimes and are in the care of the state have grown. Last summer Peter Clarke, HM Chief Inspector of Prisons, presented an alarming assessment of the operations of the youth justice estate in his 2016/17 annual report, describing the speed of decline as "staggering" and tragedy as "inevitable."
3. It is difficult to imagine a school, children's home or even a hospital being described in such terms and continue to operate unchallenged. In children's homes Ofsted have the power to suspend a registration whilst in children's services, the Department for Education has the power to set up an alternative delivery model to take on the running of vital services if serious concerns are identified. This is a clear double standard. Particularly when we take into account the complex and overlapping needs of children and young people in conflict with the law have, including learning difficulties, poor mental and physical health overlaid with traumas such as bereavement. In HMIP's 2017/18 annual report this picture has improved somewhat, however, children continue to feel unsafe and it was noted that levels of violence in STCs were the highest per head of those held in any type of institution HMIP inspects.
4. ADCS supports Ofsted's move to bring the new STC framework closer to the Social Care Common Inspection Framework (SCCIF) and the focus this brings to expectations, experiences and outcomes rather than processes and compliance.
5. The rationalising of the grade structure makes sense although resettlement, health and safety are all important factors and will hopefully feature prominently elsewhere (it is noted that a clear statement will be made on resettlement work in final outcome reports). A keen focus on health, safety and welfare is particularly important given the current context – levels of

**The Association of Directors of Children's Services Ltd**

Piccadilly House, 49 Piccadilly, Manchester, M1 2AP

0161 826 9484 | [info@adcs.org.uk](mailto:info@adcs.org.uk) | [www.adcs.org.uk](http://www.adcs.org.uk) | [@ADCStweets](https://twitter.com/ADCStweets)

violence and self-harm in the secure estate remain stubbornly high according to the national data, this is supported by the findings of consecutive resident surveys. ADCS backs the proposal that, in this context, 'help and protection' is a limiting judgement, this sends the right signal to all concerned about the priority areas of focus.

6. Plans to bring greater structure to the response to an inadequate inspection outcome are welcome and again this moves us closer to accepted practice in the delivery of wider children's services. STCs are inspected on an annual basis, when serious failings are identified it is right that the inspectorates revisit to ensure performance has not deteriorated further. The introduction of regular monitoring visits will make this more robust as will the proposed return visit within eight weeks and a review meeting with the relevant central government departments and agencies. We think that it is essential that representatives of the host local authority e.g. Medway or Milton Keynes, are part of these meetings too given their statutory responsibilities in relation to safeguarding and education.
7. Moving from an on-site survey of children and young people to a fixed point in time approach will allow their voices and lived experiences inform both the timing of inspection activity as well as key lines of enquiry. This is welcome and could be a potentially powerful improvement tool if the findings are utilised by STC management teams to inform improvement plans. The introduction of a short, three-day notification period is similarly welcome, we do not believe systemic failings can be covered up in this time and the unannounced nature of the current inspection adds additional and unnecessary pressure on staff of all levels.
8. ADCS would welcome the opportunity to remain in dialogue with Ofsted on this issue. Please contact Katy Block, ADCS Policy Officer, [katy.block@adcs.org.uk](mailto:katy.block@adcs.org.uk), to discuss in the first instance.