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JTAI consultation response from ADCS, the LGA and Solace

The idea of introducing a multi-agency inspection to gauge the effectiveness of local safeguarding arrangements is supported by ADCS, the LGA and Solace, but we require further clarity on how this new inspection fits with the overall arrangements for inspection for children's services under the existing Single Inspection Framework (SIF), and going forward, how this will feed into the post-SIF framework due in 2017.

We all need to be mindful of the efficiency of the overall system and the need to ensure that new arrangements do not add unreasonable burden for either inspectors or the inspected. We would therefore like to propose that after undertaking the first six JTAs, between November 2015 and March 2016, there should be a pause to consider whether there is value in this approach. It is important that the learning from this exercise informs the methodological basis on which the next universal inspection framework is formed and that immediate consideration is given to how to incorporate this important aspect within the new inspection regime in a sustainable way.

Specifically we welcome the following aspects of these proposals:

- We believe that the narrative judgement proposed in the JTAI will prove an effective and efficacious tool and should be carried forward in all future inspections
- That inspectors from each of the relevant inspectorates jointly auditing case files is a positive development
- That a thematic approach to inspection continues post-SIF
- The JTAI proposals recognise that the LA is not the sole agency responsible for safeguarding children and young people. Each inspectorate should report to their own agency against their own frameworks and monitor improvements as appropriate.

A methodology, which brings together the wider safeguarding partnership, is essential however there has been a complete lack of transparency and clarity regarding the rationale, framework and longevity of the programme of JTAs. The focus on leadership and the effectiveness of the LSCB duplicates key areas of the SIF and our respective memberships are disappointed that the consultation offered extremely limited opportunities for comment and that the timescales to respond are so tight. The JTAI proposals are complex and have been developed after limited consultation, without sight of a framework and in the face of no local areas coming forward to volunteer to pilot the proposals.

In terms of auditing case files it is unclear from the information provided in the consultation document how these cases will be selected, the methodology that will be employed and how

moderation will take place. If this exercise is focussed on a single thematic area then an audit of five cases was felt to be sufficient.

ADCS, the LGA and Solace welcome the progress that has been made to introduce narrative rather than graded judgements and we would encourage this approach to be adopted across the current suite of inspection frameworks. It is, however, unclear what kind of quality assurance processes will be in place to ensure the approaches taken by each of the inspectorates, and the judgements they arrive at, are consistent.

We value thematic inspections and it is not clear that the 'deep dive' element of the JTAI framework will offer the same benefit. We suggest that the inspectorates should take stock of its success after the first six inspections. We acknowledge the political imperative of selecting CSE and missing from home, school or care as the theme of the first six JTAs and ask that the sector is involved in the determining future themes if this proposal is taken forward as part of the next universal inspection framework. Other subjects that might usefully be covered include radicalisation, children living with domestic violence and responses to unaccompanied asylum seeking children.

While the principle of quality assuring local multiagency arrangements is correct, and the chair of the local safeguarding partnership has an important role to play, they are not accountable for the services which make up the partnership. Independent chairs are only contracted to work a small number of days each month and it is usual for the LSCB manager to work part time, which could cause delays in the dissemination of an inspection notification across the partnership. We believe that notification should be to the accountable individual in each of the statutory agencies of the impending inspection. If there needs to be a single point of notification to the designated lead officer for children in statute, the notification should be received by the director of children's services (DCS).

As this is a partnership inspection we believe feedback should be delivered in a joint forum and each local agency should also have the opportunity to receive tailored feedback from the relevant inspectorate. Prioritising recommendations in the final report would assist the local partnership in its response to the inspection and assist in the formation of future improvement plans. A single joint response, if time permits, should be crafted on behalf of the local partnership, if this is not logistically possible in the allocated time then the option of each agency providing a separate response should be provided.

Earlier this year ADCS, the LGA and Solace published an alternative proposal to the SIF which outlined ways in which the inspectorate could better gauge the effectiveness of services for children and young people via smarter use of the range of data LAs submit to a plethora of government departments. This approach would reduce the burden on authorities and allow good practice to be identified, as would the triangulation of data between, and across inspectorates, and seeking the views of children and their families.

Our members disagree with the notion that the JTAI could be applied to local authorities alone. It is unclear under what circumstances this will be deployed and the benefits this ultimately offers to children and young people. This move will only serve to draw staff and senior leaders away from frontline activity to service inspection.

In conclusion, to maintain the JTAI beyond the proposed six inspections would be unsustainable for inspectors and inspected, unaffordable to government, and represent a significant increase in the inspection burden placed upon LAs. It is simply not proportionate to retain the SIF, commence a multiagency JTAI, a single agency JTAI focussed only on the local authority and begin a new inspection of SEND provision within the same short timeframe.