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ADCS response to the children's social care national framework and linked data dashboard consultation

1. Introduction

The Association of Directors of Children's Services Ltd. (ADCS) is the national leadership organisation in England for directors of children's services (DCSs) 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, including children's social care and education. ADCS welcomes the opportunity to respond formally to this important consultation by the Department for Education (DfE).

ADCS held a series of internal meetings to inform our response to *Stable homes built on love*, and the two related consultations. Views shared in these engagement sessions, plus discussions at relevant ADCS policy committee meetings in recent weeks, have informed this submission on plans for a new national framework and data dashboard.

2. Framework

ADCS members were broadly supportive of the re-introduction of a national framework and agreed with the draft purpose of children's social care and the principles that underpin this important work. However, there were some concerns about the absolute focus on local authorities (LAs) and the ability of leaders of children's services to affect change in both the framework and linked data dashboard given the wider aim of multi-agency, multi-disciplinary working in the independent review and the government's implementation plan. Safeguarding is everybody's business.

Throughout the framework, leaders of children's services are called on to 'ensure' a range of actions are undertaken, some of which sit outside of our influence. The buy-in of other relevant departments and agencies as well as local partners is required but not yet secure. A duty to cooperate is more than attendance at meetings, it means making resources, including staff and funding, available to fulfil statutory responsibilities. A commonly raised difficulty at present is raising the profile of children and young people in the work of Integrated Care Boards before we even get to effective joint commissioning and funding arrangements with health, which is a stated expectation for LA leaders in the framework.

On balance, it was agreed that the addition of a third enabler focused on multi-agency partnership working would be beneficial. It was also felt that metrics relating to the DfE's role and progress in creating the conditions for success in the delivery and arrangement of local services should be added to the leadership enabler e.g. funding, guidance, setting policy direction.

The presentation of the draft framework is repetitive and requires rationalising for greater clarity and impact. It also somewhat muddles strategic intent with process and values in some places. Metrics in the dashboard are biased towards process and output measures,

see below for expanded comments on specific indicators. ADCS would welcome ongoing discussion with the DfE to refine and shape the measures used via existing mechanisms, such as Regional Improvement and Innovation Alliances (RIAs) and the Association's national policy committees.

3. Data dashboard

Some of the proposed data metrics are not captured or recorded in the way DfE proposes collection, yet LA systems are often configured against the data requirements of statutory returns collected by DfE. Some work under the auspices of the Data and Digital Solutions Fund (DDSF) on case management systems is likely to be helpful here but the dashboard is being progressed at the same time as these projects, which feels somewhat counter-intuitive.

On the data dashboard, ADCS members felt greater clarity was needed on its purpose and use. Utilising indicators already in use may support testing the proof of concept whilst we enter more detailed discussions about purpose and what is desirable or possible to collect and report on, now and in the future. There are a multitude of research and data projects now under way and completion of these projects plus other pilots and linked developments will allow for more detailed consideration of what is collected, when and how.

ADCS would welcome discussions on the development of new metrics to address gaps in our knowledge and insights, some of which are covered in the DDSF e.g. the voice of the child. It is also the case that data does not hold all the answers, instead research projects and qualitative insights might be used to better fill gaps in our collective understanding.

Whilst the DfE states that the data dashboard is not intended to be a performance management tool or to be viewed as a league table or scorecard, past experience tells us this is what will happen. The absence of space to provide meaningful local context to assist in the interpretation of what are largely process focussed measures, was felt to be a significant omission by ADCS members.

Careful thought about the definition of measures is needed to ensure like for like is being both recorded and submitted, for example, the DfE has a different definition of children in need (CiN) (which includes children in care) to the one routinely used by LAs to understand local practice and performance. Accompanying guidance will be equally important to ensure that it is clear whether a higher or lower number is desirable. Again, providing space for the inclusion of contextual information alongside figures will be particularly important given the now established link between poverty and child welfare interventions, see Bywaters et al, 2016 and various.

ADCS would welcome a discussion in the round on the different types of data submitted at various intervals including national data returns, which are a huge undertaking both locally and nationally (it routinely takes DfE 12+ months to cleanse, analyse and publish statutory returns) and the quarterly dataset of management information submitted by RIAs.

LAs already submit a suite of 24 indicators via the RIIA dataset, the draft plans for the dashboard include 31 measures, not all of them are new but the proposed quarterly frequency is, as is publication. A decision about quality versus timeliness must be made by the DfE given the dashboard will be published. Quarterly is too frequent to complete and quality assure based on current capacity. Instead, annually was felt to be most appropriate given these data will be published and a thorough validation process will be required before submission.

ADCS members queried how these data will be used by DfE, and other government departments or agencies, the dashboard in particular could create a lot of noise in the system. However, if this ultimately provides a more solid evidence base for DfE to seek, and crucially secure, investment from HM Treasury, then this would be a positive outcome. During ADCS consultation meetings, members were clear that raw data is unlikely to offer ministers the system assurances they're looking for, children's social care is complex and understanding local context is key. Data can only ever prompt discussions, not provide the answer. Is there a role for RIAs here in having qualitative conversations? Or the DfE's Regions Group?

At present, only the education, employment and training measures for care leavers are outcome focused but some specific consideration is needed for formerly unaccompanied migrant children, see below. ADCS members wondered how research can be built into this new development, this capacity has eroded over time in LAs and is virtually non-existent in places. Data can only take us so far, particularly when focused largely on volumes and pressures.

In 2019, researchers from the Rees Centre at the University of Oxford published proposals for a new outcomes framework for children's social care (La Valle et al, 2019) to better support service planning, practice improvement and accountability. In that exercise, the importance of understanding local context, corporate and political support as well as the role of local agencies was underlined alongside the need to triangulate data to reflect the complexity of children's social care. This nuanced and multifaceted approach was felt helpful at the time but isn't yet sufficiently reflected here.

- **Outcome 1 – families stay together and get the help they need**

Feedback on initial dashboard indicators:

The school attendance of CiN metric is not easily available, the cohort is fluid and school census data can be lagged by up to two terms. The real time collection of attendance data from schools is still a work in progress, coverage is not complete and data is not yet multifaceted. Thought may need to be given to how best to consider children and young people with SEND, who are automatically allocated CiN status, here as they face a different set of challenges and can have significant health needs which impact on school attendance.

On repeat referrals, it will be important to understand whether this is for the same or a different reason, this measure can also speak to the appetite for risk across the local partnership.

Rate of new entrants to care and rates of children in care are both examples of the importance of seeking local context given the established link between poverty and children's social care activity. UASC presentations are higher in some authorities with an entry port, for example, which again illustrates the need for contextual information to be provided alongside raw numbers. Further, ADCS members were concerned that this measure could imply that keeping numbers low is more desirable or that having high rates of care may somehow imply poor practice when our focus should always be on ensuring the right children are in care and that they're in the right placements.

- **Outcome 2 – Children are supported by their family network**

Feedback on initial dashboard indicators:

ADCS members felt the proposed measure on the percentage of Section 31 proceedings that end with the child living with parents is an example of the need to have clear guidance and definitions. Whilst *Stable homes built on love* places a strong emphasis on children remaining in family networks, there are widespread and ongoing concerns by LAs, as well as the President of the Family Division, about the persistently high use of Care Orders at Home in some regions and localities.

On the percentage of children living within their family networks, again clarity of definition is key, there were differing interpretations amongst ADCS members about the inclusion of connected carers, for example.

- **Outcome 3 – Children are safe inside and outside of their homes**

Feedback on initial dashboard indicators:

On the number of Section 47 investigations, this will correlate with the size of the authority and its child population, seeking the rate is therefore helpful. There will be an associated link with levels of deprivation locally too. It is also the case that having a Section 47 assessment isn't an outcome for a child, it's a gateway to a practice response.

On the measure around the percentage of children whose plan was de-escalated and did not present again with unmet needs within two years, it is unclear what the rationale for this measure is. Further nuance might be needed to gain better insights into children's experiences. A child may present with different needs within the two-year timeframe, how will this be factored in or captured?

- **Outcome 4 – Children in care and care leavers have stable, loving homes**

Feedback on initial dashboard indicators:

The stability measures around placements in residential care, distance and stability could send some unhelpful signals to the sector resulting in unintended consequences. Residential care is not bad in and of itself; it has an important role in the system.

Strengths and Difficulties Questionnaire scores show these data have been collected but do not demonstrate the impact on practice or how these insights have been used to improve children's outcomes.

On progress and attainment for children in care, length of time in care is an important contextual consideration as a growing body of evidence shows that the stability offered in care improves educational outcomes over time compared to the nearest peer group, CiN (see Rees Centre research, 2015 and 2020).

On the care leavers metrics, it will be important to specifically consider challenges former UASC, which are a growing proportion of the care leaver cohort across the country, face in relation to access to employment, training and skills measures. If their immigration status is yet to be determined and they have no recourse to public funds, they are unable to legally work or study in this country. We do not have influence over the immigration system to resolve these barriers to participation.

- **Enabler 1 – The workforce is equipped and effective**

Feedback on initial dashboard indicators:

Here, the dashboard indicators of turnover rates, use of agency social workers and caseloads will require careful definition to ensure LAs are not counting or reporting different things. It is also the case that average measures, here for caseloads, can disguise significant anomalies or outliers. ADCS members were clear that the proposed measures will not offer clear insights into the quality of practice.

Since April 2022 the RIIA dataset has included workforce data metrics, there is an annual child and family social worker statutory collection and the DfE consultation on the use of agency social workers includes plans to create a linked dataset too. Workforce data are difficult to capture and report on given this information is generally held by corporate or HR services within the LA. The experience of extracting and reporting a small number of social work workforce measures via the RIIA dataset has been difficult, DfE support could make this task smoother. ADCS would welcome discussions about how to limit burdens on LAs from overlapping requests and collections.

- **Enabler 2 – Leaders drive the conditions for effective practice**

Feedback on initial dashboard indicators:

Funding children's social care activity is drawn from multiple sources and streams, from Supporting Families and the public health grant to contributions from partners and locally raised council tax. The bulk of funding is not received via the DfE but via the DLUHC revenue support grant. It is also the case that the principal financial data collection on spend in children's services is highly variable and unreliable, indeed there is a DDSF project looking at the Section 251 return for this very reason. The parameters of social care spend are permeable and ADCS members queried whether spend on mental health services in the community or EHCPs for children in care should be included here, for example.

ADCS members felt that a focus on broader funding for children's services, accompanied by an indicator of year-on-year trends, is a more appropriate financial measure. Often the framework seems to refer to children's social care as an entity in and of itself, which it is not. The parameters of this broader lens are clearer and would provide an insight on corporate and political priorities too – children's services, and children's social care, do not operate in a

vacuum. The local financial context after more than a decade of fiscal austerity and the impact this has had on the delivery of public services will be an important contextual factor to consider here.

On the proposed DCS and practice leader turnover measure, ADCS members felt the stability and consistency of middle leaders, including team manager and heads of service, is arguably more influential on social work practice than the DCS. A clear definition of practice leads will need to be provided given the variation in arrangements across LAs and the added complexity of larger LAs operating locality teams.

Finally, ADCS members felt there should be some metrics and focus on government's leadership of, and support for, the delivery of children's services and children's social care. The role of the DfE in shaping the system as a whole with a clear link to the contribution regional teams make to RIAs was felt to be helpful. As already stated, the framework and dashboard could be used as a lever for a bolder approach to the multi-agency safeguarding partnership elements of reform.

To discuss any of the specific issues raised here in further detail, please contact the relevant policy officer in the first instance via katy.block@adcs.org.uk.