

Friday 29 April 2022

ADCS response to the [‘Opportunity for all: strong schools with great teachers for your child’](#) white paper

Introduction

1. The government’s white paper ‘Opportunity for all: strong schools with great teachers for your child’ sets out the government’s ambition for a fully trust-led system to deliver the right support, in the right place, at the right time for every child. The reforms set out in the white paper are focused on achieving access to excellent teaching for every child, delivering high standards of curriculum, behaviour and attendance, targeted support for every child who needs it and a stronger and fairer school system. The Association of Directors of Children’s Services (ADCS) is the national leadership organisation in England for directors of children’s services (DCSs). The DCS acts as a clear and unambiguous line of professional accountability for children’s wellbeing in a local area and is tasked with working in partnership with headteachers, governors, academy sponsors and principals to promote educational excellence, take rapid and decisive action in relation to poor performance and promote high standards.
2. The local authority (LA) and DCS have a number of statutory duties relating specifically to children’s education including: to ensure fair access to school places, to deliver suitable home to school transport arrangements and to ensure high quality education for children and young people with special educational needs and/or disabilities (SEND), plus securing alternative provision outside mainstream school. Further, the *Children Act 2004* includes the statutory responsibility for the LA to ensure all children and young people receive appropriate quality education. This requires the LA to receive sufficient assurance information and have sufficient authority within the education system to be able to deliver on this responsibility.
3. ADCS welcomes the government’s commitment to ensuring all children achieve their full potential within a stronger, fairer school system, and that they can access the right support at the right time. LAs have long played a key role in education from championing the best interests of every child, through to promoting school improvement and planning places to meet local need and in partnership with local schools. As the paper recognises, the current school system is fragmented, however, it is compounded by an accountability system that does not reward inclusive practices leading to rising school exclusions and a widening of the attainment gap between the most disadvantaged children and their peers. We hope that the measures set out in the white paper take us towards a more coherent education system that works for all children, whatever their needs, wherever they live.

The Association of Directors of Children’s Services Ltd

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ADCS is clear that education is about more than just the acquisition of qualifications, it is also about promoting resilience and wellbeing and supporting those children who need extra help to achieve their potential, including children from disadvantaged backgrounds, those in care or with SEND.

An excellent teacher for every child

4. ADCS welcomes the government's commitment to investing in the teaching workforce through training and development opportunities. However, it is important that the entire schools workforce, who play a vital role such as in attendance and pastoral support, also receives appropriate support and training. The teaching profession has been under immense pressure in recent years, which has been exacerbated by Covid-19. The pandemic continues to have a disruptive impact on schools today with the lifting of national restrictions and ending of free testing. The experience of the last two years has been extremely difficult for many children, young people, teachers and school leaders. It is therefore vital that the government continues to put in place measures to retain enough experienced teachers as well as improving future supply entering the workforce; recent surveys have shown a frighteningly high number of staff, including school leaders, who have been leaving or plan on leaving the profession all together in the near future. The past two years will have exacerbated this significant issue.
5. The confirmation of the continued roll out of National Professional Qualifications and investment in the development of the early years workforce are equally important. The early years present the best opportunity to close the attainment gap and improve social mobility, yet this cadre of the workforce has not received sufficient attention or investment in recent years. ADCS members are clear that greater investment in the early years workforce is required, not only in developing and retaining existing staff but also attracting people to this rewarding career, including investments in new and existing routes into the profession. The early years sector continues to feel the impact of the pandemic, which saw reduced usage and the loss of experienced staff who felt overlooked and at personal risk as a result of pandemic responses and policies. ADCS would welcome a focus on this workforce that goes beyond the economic imperative to support parents and carers to work but focuses on providing children with high quality early education and the best start in life.

Delivering high standards of curriculum, behaviour and attendance

6. The effects of the pandemic on children's lost learning has been significant and it is right that there is a focus on recovery. However, this should not be at the expense of delivering a balanced curriculum. Whilst the white paper

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makes reference to a “broad and ambitious” curriculum, schools must also be incentivised to have sufficient focus on subjects other than literacy and numeracy to cater to the needs of all learners. Practical and arts based subjects are vital for health and wellbeing but remain disrupted by Covid-19 to this day.

7. ADCS welcomes the focus on attendance and recognition of the role LAs can play in identifying patterns in absence and closely working with schools and children to address issues and concerns at the earliest opportunity. The reasons for persistent absenteeism are often a symptom of wider issues in a child's home life and it is important that the value of early help and support services is recognised. In our [response](#) to the recent Department for Education consultation on improving consistency of support for school attendance, ADCS noted that the introduction of a national framework for the use of legal intervention must provide room for flexibility where necessary as each LA operates within its own context. As leaders of place, LAs have a unique understanding of the challenges children and families face at any given time in their local area and this must be reflected in any regulatory framework.
8. ADCS supports the introduction of a register of children not in school, including those who are electively home educated. ADCS has long called for such a register and we welcome the proposal to bring forward this legislation. According to ADCS [research](#), the number of children becoming electively home educated has been increasing by approximately 20 per cent year-on-year, with the number increasing even further during the pandemic period. It is vital that LAs have the powers to assure themselves that all children and young people in the locality are safe and receiving a suitable education.
9. Whilst ADCS agrees that a positive behaviour culture in schools is important, this should be underpinned by a strong focus on inclusivity. ADCS would have welcomed a more strengths-based approach to the recently updated Behaviour in Schools guidance to emphasise how schools can support pupils overcome barriers to learning. The pandemic and ensuing lockdowns will likely have exacerbated ongoing issues that previously existed, such as rising child poverty and disadvantage, increased domestic violence and poor mental and emotional health and wellbeing. However, inflexible school behaviour policies too often do not allow for reasonable adjustments to be made when children have previously, or are currently, experiencing adversity. The issues raised here link heavily with the *SEND and Alternative Provision Green Paper* and we are keen to work with government, and others including parents, health partners and schools,

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on the new national SEND standards as they develop and see a shift towards a more inclusive education system which ADCS has long called for.

Targeted support for every child who needs it

10. ADCS welcomes efforts to provide additional support to all pupils who fall behind including engagement with parents and carers. Schools continue to work hard to mitigate the effects of the pandemic on pupils so that they are supported to reach their potential and sustained funding to support this activity will be key. However, ADCS would also welcome a stronger focus on children's wider needs beyond academic attainment. It is vital that schools are able to provide wraparound support with a focus on children's mental health and emotional wellbeing as well as enrichment activities. Beyond learning, children lost myriad other important experiences and milestones as a result of the pandemic, from school trips and plays to transition visits to new schools. Vulnerable children will have been disproportionately impacted by the pandemic and thousands more children have been pulled into poverty during this time. Whilst the continued roll out of mental health support teams is positive, this is not nearly ambitious enough with only 35 per cent of schools by 2023 set to benefit from this vital support.

A stronger and fairer school system

11. The announcement of LA-run trusts potentially provides a new and exciting opportunity for local schools to stay part of the local government family and maintain vital local links. LAs have a strong record of running high performing schools in their local areas and will continue to work with all schools, irrespective of governance arrangements. Where LAs do establish a trust, it is important that they do not become a 'trust of last resort' but instead are able to take on a variety of schools. It is also important that there is equity between LA-run trusts and other established multi-academy trusts by applying the same standards and regulations, however, ADCS would question the need to limit LA involvement on a trust board. LAs have long supported both maintained and academy schools without conflicts of interest arising. Children's rights, their experiences and educational outcomes are our priority, not structures.

12. The investment in Education Investment Areas where education performance is lower as part of the levelling up plan is an important part of education recovery, particularly for those from disadvantaged backgrounds. We know that more deprived areas and communities were disproportionately affected by Covid-19 in terms of infection rates as well as disruption to schooling. Despite this, it is disappointing that the paper is silent on the impact of poverty and does not include strategies to reduce, and ultimately,

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end child and family poverty. Given what we know about the impact of this on children's ability to learn in the first place e.g. via access to quiet places at home to study or resources to partake in extra-curricular trips, this is a missed opportunity and a barrier to levelling up.

13. ADCS welcomes the government's commitment to provide greater clarity on the role of each actor in the system, including additional powers for LAs to match their responsibilities. As detailed above, LAs have a central role in the education system and providing LAs with new powers to more effectively deliver on their sufficiency duty, including backstop powers to direct trusts to admit a child where collaborative working breaks down, is right. It is important that new arrangements are delivered in a locality via genuine partnership, with all players working in concert to ensure that all children and young people receive a good education.
14. Inspection activity in recent years has lagged behind the reality of education reforms meaning there is a noticeable gap in our collective understanding about the contribution multi-academy trusts make to improving children's outcomes as well as their use of public funds. The white paper's commitment to hold trusts clearly to account and the launch of a regulatory review in May 2022 is a welcome development. Further, the definition of trust strength as set-out in the white paper will be a central part in delivering reforms to the SEND system through high quality and inclusive education with fair access for all learners. ADCS looks forward to working with the Department for Education, and Ofsted, as these plans evolve and take shape.
15. Finally, moves to provide greater clarity on the role and contribution of schools and other education settings to Local Safeguarding Partnerships are welcome. The planned cycle of safeguarding audits of school policies seem helpful too and must extend to independent schools in the local area. This will ensure equity and protection for all children and young people following the first hand disclosure of tens of thousands of allegations of harassment and abuse last year via the Everyone's Invited website.