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ADCS response to Ofsted's proposals for inspecting supported accommodation

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 to this Ofsted consultation.

ADCS held an extraordinary meeting of our national Standards, Performance and Inspection Policy Committee last month to discuss the proposals for inspecting supported accommodation from spring 2024 onwards. This response draws on those discussions.

1. Whether there should be three possible outcomes for the first round of inspections

- On grading, there was some concern about the framing and impact of the 'serious and widespread concerns' judgement, particularly as a re-inspection is not expected to take place for six months. It was felt the emphasis would be better placed on young people's experiences and outcomes, so this judgement could become: "serious concerns about the experiences and safety of young people"
- Given the significant variation in types of provision falling under the banner of supported accommodation, the group supported the plan not to grade the first tranche of inspection reports, however, it might be helpful to indicate in feedback what the judgement would have been to support learning and improvement in the system. This information is helpful to us as commissioners too.

2. Whether providers should have two days' notice before an inspection

- On the proposed notification period, two days was not felt to be sufficient given it is a provider being inspected rather than an individual setting. Such a short notice period will also impact on the ability of young people to meet with inspectors and share their views and experiences. Given the age profile of the cohort, there is scope for significant and meaningful involvement here.

3. What effective supported accommodation looks like, and what inspectors should look at during inspections?

- It's not clear the inspectorate has a reliable baseline of 'what good looks like' in this space, both in terms of provision and of the outcomes achieved. It is very different to residential children's homes sector
- When looking at young people's plans, it will be helpful to consider whether the accommodation is meeting their needs so there is an ongoing link back to outcomes achieved
- Clearer expectations about what good access to technology represents would be helpful in anticipating what inspectors are looking for
- A similar point was made regarding financial stability, what criteria will inspectors work to here and what could recommendations look like in this space
- On missing and exploitation, the focus could more usefully be on ensuring the provider has the right policies, procedures and relationships in place so that staff there know how to confidently respond when such concerns arise

- It is important to be clear from the outset that the registered manager role for supported accommodation is significantly different to that of a children's home.

4. Other comments

- The group expressed some unease about references to children rather than young people here which could send mixed messages about the care v support principle.
- How inspectors interpret the new regulations and standards will be crucial. There should be regular review points involving all relevant stakeholders as this new process is rolled out to ensure that individual placements, or indeed the entire market, is not unintentionally destabilised; it could be disastrous for young people if stable arrangements ended at short notice because of inspection activity, as can be the case in the children's home sector.
- It is important that the inspection framework is flexible enough to recognise the diversity of provision, and providers, and can acknowledge that for certain children and young people, a short-term placement in a mobile setting is the right intervention to stabilise them during a crisis, for example. In reality, it may also be the only available option whilst the search for a longer term placement continues. In such circumstances, it would be important for inspectors to consider the bespoke package of wraparound support for the placement.
- Recent research ([County Councils Network, 2023](#)) indicates that up to one in five providers may withdraw from the market ahead of the new inspection regime getting underway and the costs of placements could rise by almost a third. Given this context ADCS continues to call for caution in these reforms, as already sated, any loss of capacity in the sector would be disastrous at this time, see below.
- There are a series of complex and interconnected factors in the wider safeguarding and care systems which ADCS remain concerned about from placement sufficiency, workforce recruitment and retention and funding perspectives. The recent High Court judgement ending the use of Home Office hotels for unaccompanied asylum-seeking children, many of whom are ultimately placed in supported accommodation, is also a pressing issue.
- Finally, it is not clear why there is a built-in delay in responding to the consultation (which is due by February 2024 yet inspections are expected to commence next spring). The consultation does not explicitly state that piloting will take place, or when. Although providers will be assessed under the umbrella of the established Social Care Common Inspection Framework, this is an entirely new area of activity. ADCS members are clear that careful testing and learning is required for the benefit of a newly recruited inspection workforce, those providers who have no prior experience of inspection and the sector as a whole.

ADCS would welcome further discussions with the inspectorate on any of the points raised in this response. Please contact the relevant policy officer in the first instance via katy.block@adcs.org.uk.