

Legislating For Sure Start Children's Centres: Public Consultation

Response by the Association of Directors of Children's Services

The Association of Directors of Children's Services (ADCS) is pleased to submit this consultation response on behalf of the Children and Families Policy Group. ADCS is the national leadership organisation in England for directors of children's services appointed under the provisions of the *Children Act 2004* and for other children's services professionals in leadership roles. The Association provides a national voice as a champion for children, with local and central government, and with the public.

Question 1: Do you support putting SSCCs on a firm legislative basis?

In principle, ADCS support putting SSCCs on a firm legislative basis to ensure they are considered an established part of the Local Authority's duty of care toward children and their families.

Question 2: Do you agree that local authorities should have this duty?

Yes, it builds on good practice already offered by Local Authorities.

Question 3: Do you agree that these are the defining characteristics of a SSCC?

In response to paragraph 16, whilst there is agreement with the definition of a SSCC as a whole, it is vital that whilst securing integrated Early Childhood services, SSCCs should be platforms of a range of integrated services, combining various funding streams, within localities to benefit **all** vulnerable children, young people and their families, and should therefore not be limited in its scope.

The consultation does not reflect the 0-19 vision of linking the Children's Centre and Extended Services agendas within the wider Children's Services vision.

Question 4a: Do you agree that these duties would reinforce partnership working between key local services?

ADCS agree with the proposals.

Question 4b: Are these the right partners to include?

Yes.

Question 5a: Do you agree these elements of current good practice should be included as requirements in the legislation?

ADCS would view consultation between the Children's Trust Partnership and SSCCs as good practice. The Advisory Board, with representation from children, young people, parents and carers; the centre management team; service delivery partners and the Local Authority, would be the favoured approach. However it is deemed that a flexible approach to engaging parents would be more appropriate. One option would be that parents and carers form a separate Parent's Forum from which they would then have representation on the Advisory Board. This would encourage some of the more hard-to-reach families to attend, as it would be a less formal meeting, where they felt more able to actively participate. In addition, it would avoid re-creating the weaknesses of some of the Sure Start Local Programmes where representation by parents was not consistent.

Question 5b: Should there be any others?

The paper should emphasise the commissioning role of Local Authorities.

The paper needs to reinforce the Local Authority's strategic functions. The Local Authority's role is crucial to ensure that the Children's Centres like all other services meet the needs identified through robust strategic needs analysis and strategic commissioning of relevant services in all areas and localities. The success of SSCCs are dependent on the ability of Local Authorities to shape and monitor impact of services.

Best Value will be achieved through integrated working, with economies of scale and a reduction in the duplication of services - Local Authorities and Children's Trusts, through their commissioning activities, are best placed to do this. This will ensure that whatever the role and functions SSCCs provide locally, they will be expanded into wider provision and retain local flexibility.

Question 6: Do you agree that there should be a duty to inspect SSCCs at the request of the Secretary of State?

ADCS supports this.

Question 7a: Do you agree we should take a power to make such changes through secondary legislation?

ADCS does not support the proposal at 7a.

This undermines the Children's Centre ethos of local ownership and wider engagement, which would be better reflected by empowering the Advisory Boards rather than formalising governance arrangements through statute.

Through an Advisory Board, with representation from children; young people, parents and carers; the centre management team; service delivery partners and the Local Authority, local flexibility can be maintained whilst fitting in to the overarching strategic aims.

We would be especially concerned about the arrangements put forward in paragraph 25, regarding the secondary legislation of setting up Governing Bodies and introducing a delegated budget.

Question 7b: Do you agree with the list of potential requirements?

No, ADCS do not agree with the potential requirements.

Question 7c: Can you think of any others at this stage?

Further clarification on the above points is needed before an answer can be provided.

Question 8: If you are a SSCC provider, how would these proposals affect your organisation?

Not applicable.

Question 9: Do you have any other comments you would like to make?

No.

This response has been prepared by Moira Swann, Corporate Director of Children's Services, Cumbria County Council and ADCS Children's Centres Policy Lead. Any queries regarding this response should be addressed in the first instance to Robert Belli, Administrative Officer, ADCS (e) robert.belli@adcs.org.uk .

4 November 2008