

Friday 17 May 2024

ADCS response to Ofsted's The Big Listen 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.

During April and May, ADCS held three virtual consultation events focused on different aspects of The Big Listen and discussed the Association's response at ADCS Council of Reference along with the relevant national policy committee. This resulted in over 130 ADCS members directly feeding into this draft and process. Given the broad nature of the role of the DCS and the clear duties placed on local authorities (LAs), this response speaks to all areas of Ofsted's work. The ADCS response firstly addresses the common narrative questions and themes across the different areas of Ofsted's inspection activity and then offers more focused feedback on specific frameworks.

Over the last decade or so, the inspection landscape of children's services has evolved significantly. Ofsted currently operate several frameworks including the EIF, which assures education settings, and the SCCIF, which is used to assess social care providers and settings, including IFAs and children's homes. The work of LAs is examined via several different frameworks; the ILACS looks at children's social care and the JTAI looks at multiagency safeguarding, with a lead focus on the LA. The area SEND (ASEND) framework looks at services and provision for children and young people with SEND in a place, again with a lead focus on the LA.

Future inspections are development e.g. for supported accommodation for 16- and 17-year-olds. There are also regular thematic inspections attached to the ASEND framework and others carried out on an ad-hoc basis e.g. the recent thematic of regional adoption agencies (RAAs) commissioned by the Department for Education (DfE).

Additionally, local youth justice services are inspected by HMI Probation, which includes periodic thematic reviews, and some LA provision may be registered and inspected wholly, or in part, with the CQC. Outside of inspection, there is a rich tapestry of accountability to scrutinise the work of children's services and children's outcomes. From the courts and tribunals service, the National Child Safeguarding Practice Review Panel, and ombudsmen, to a range of local audit, scrutiny and assurance processes and forums.

Despite this complex landscape, ADCS members generally support the principle of inspection and accountability. However, there is a growing lack of congruence between different frameworks and regulatory regimes e.g. the need to register some placement settings with both CQC and Ofsted or the duplication of inspection activity where alternative delivery models (ADMs) are commissioned to deliver children's social care on behalf of the LA. Currently these ADMs, which are wholly owned by the LA, are treated as operationally independent meaning fostering and adoption services are inspected under both the ILACS and the SCCIF. This can result in the same services receiving different gradings and further adds to the inspection burden on services that are already under intense pressure as well as close monitoring and scrutiny. The shocking abuses at the Hesley group of residential special schools also underlined the danger of different regulations and inspection frameworks not speaking to each other.

Beyond layering and associated burdens, the most common concern raised by ADCS members continues to be the usage of single worded judgements and the implications of this binary approach. Looking across the four nations, a more nuanced approach to inspection can be seen.

The Care Inspectorate Wales deliver narrative reports which focus on strengths and areas for improvement. While in Scotland, the Care Inspectorate uses a seven-point scale to assess local services, however, only Ofsted delivers overall judgements.

2. Consistency in inspection and reporting, reporting priorities and what can be improved

ADCS members are clear that consistency in approach and in reporting is important across all forms of inspection activity. It is helpful to look at the experiences of all children, pupils and learners, at the support they receive as well as the impact providers have on progress. Consistency from place to place and across different types of providers covered by the same framework is equally important with the skills, competence and confidence of the inspection team(s) being central to achieving this aim.

When inspecting a whole system e.g. SEND, rather than a setting e.g. a school, it's important that a single agency is not held to account for the performance of an entire system; the influence of the LA and DCS is limited in terms of directing the resource of partner agencies, curbing exclusive behaviours in some schools or in setting priorities in a rigidly top-down national health system. Presently, LAs and the DCS have all the accountability but in practice few levers to secure the buy in and support needed to improve children and young people's experiences and outcomes.

In children's social care, inspection reports are much shorter than under previous frameworks, meaning it can be difficult to understand what has worked well, and why, and equally, what may not have worked so well, and why. Ofsted has an unparalleled overview of local systems and practice, which is not yet being systematically captured and shared across all domains of work. In the past "getting to good" seminars were part of the inspection terrain, with an emphasis on improving children's social care. Synthesising learning and consistently sharing this back e.g. via a briefing that draws on insights or strengths seen during inspections could support future service planning and improvement work at both a local and regional level via sector-led improvement arrangements.

There are many common themes in inspection reports, particularly in the ASEND space, which are presented as issues and challenges in isolation within a specific area, rather than national challenges that individual LAs, and partnerships, are unable to solve without government intervention or support. These include the chronic shortage of education psychologists, which impacts on the timeliness of assessments and planning, or the sustained increase in demand for specialist health assessments. ADCS members felt Ofsted (and CQC) could synthesise common themes and findings into regular reports for government to inform future policy development to address the barriers and challenges that are felt across the sector and hamper improvement efforts.

The ILACS framework includes some consideration of involvement with sector-led improvement, it would be helpful if this was increased and developed across other frameworks and clearly reported on. Contributions to the wider collective endeavour to improve the experiences and outcomes of all children in a place, in the case of a school or college, for example, or all children and families across the country in the case of LAs. This could sit within contextual information as well as being considered under the leadership and management judgement.

Ofsted works on a regional basis, the experiences of ADCS members shared during the Big Listen engagements suggests there are some notable differences in approaches between regions, which adds to the complexity of the picture. More consistency and transparency between regions would be welcome e.g. on approaches to annual engagement meetings and the write ups that follow.

3. Comments on duration of notifications and fieldwork and current inspection practices

It is not clear why no notice inspection has become the norm across key inspection frameworks, or the benefits of this approach. The continued use of short or no notice periods adds further stress to the process for leaders and their teams working right across children's services, including schools. This combined with the knowledge that a poor inspection outcome could see a school be academised, a children's home closed or may even result in an LA losing control of its children's services altogether heightens both levels of stress and the stakes for leaders, and their teams.

Other inspection regimes offer significantly more notice: HMI Probation allow five weeks before visiting a local youth justice service and the newly introduced CQC inspection of adult social care has a notification period of several weeks. At present, the ILACS and ASEND frameworks include a one-week notification period but in practice inspection activity begins immediately, with data requests and meetings etc. In schools, less than 24 hours' notice is provided, although an indication of the "inspection window" is common practice.

An independent evaluation of the implementation of the ILACS framework ([University of Birmingham](#), 2019) noted that "the emotional demands of inspection are great." Numerous DCSs, and other senior leaders, shared examples of cutting short family holidays or curbing other significant personal commitments due to inspections during the ADCS engagement events. The increased level of contact as a feature of the ILACS framework plus area-based inspections and activity led by other inspectorates requires a near constant state of readiness, which senior leaders described as "taking a toll" on them and their teams. This is also a draw on productivity and takes focus away from the day job. A consistent policy across all regions for providing a window for inspection of LA services, as is the practice with schools, would be helpful for wellbeing purposes.

Recipients of an ASEND, irrespective of the outcome, report high levels of stress in managing a three-week process involving external partners who many not even have oversight of the services they're being held accountable for e.g. ICB and GPs. The group attending the SEND specific consultation event considered the merits of a longer notification period in terms of scheduling and securing engagement from children, families and practitioners. However, there was no clear consensus on this; an extension was seen by some as a risk given the level of disruption to the day job caused by inspection. Similar points were raised and considered in the social care consultation event in relation to the ILACS and the JTAI.

It is also clear that there are different approaches to gathering evidence during inspection fieldwork, with the volume of requests from inspectors for additional documents, reports and case files varying greatly in the social care space. The independent evaluation of the implementation of the ILACS framework (University of Birmingham, 2019) highlighted a gap in evidence as to how inspectors make their decisions and the experience of those being inspected. There is a focus on processes and administrative tasks and a "very heavy preoccupation with what is documented and writing things down," leading researchers to suggest inspections take a greater focus on observation of practice rather than reading casefiles. ADCS members support this view.

The experience of inspectors was a common topic of discussion across all ADCS engagement events and meetings. The currency of practice and the seniority of experience was raised as well as the benefits of involving relevant practitioners in inspections. This issue is most pressing in the inspection of systems rather than individual settings or services. It was noted that ASEND inspections are led by education inspectors who do not have prior experience of leading complex systems or of casework. The use of serving practitioners is beneficial for both the inspectorate and the sector but it is difficult to release staff from the day job. Flexibility in both training and commitments may help unlock some practical barriers for senior LA leaders to contribute here.

As the number of inspection frameworks has grown, so too has the burden and likelihood of overlap. Plans to inspect supported accommodation providers, a new focus on financial regulation in the care placement market plus an inspection regime for adult services adds further variables. Although different frameworks and inspectorates are used, senior leaders, as well as data teams, are drawn away from their core functions and into all elements of inspection activity. It was suggested a gap of at least one term, ideally two, (or three to six months) between each inspection event would be beneficial to allow services, and staff, to recover and return to business as usual.

In our consultation meetings, ADCS members noted the disproportionality in inspection frequency across the different frameworks, with schools and other education settings visited once every four years, whilst a children's home might be inspected every 12 weeks.

4. Making judgements, contextualising judgements and feeding in data, the views of parents and children's voices, into judgements

ADCS has raised concerns about the use of single worded judgements, which tell a partial and too often a punitive story, over a number of years. The new ASEND inspection does not use the usual four-point scale but three phrases which have become de facto single worded judgements. A poor inspection outcome can destabilise the services Ofsted seeks to improve, with leaders and staff leaving, challenging judgements can also have wider corporate and political ramifications and/or impact on relationships with partners. This can serve to set back the improvement journey.

Narrative reports are already a feature in parts of the system; focused visits under the ILACS framework result in a narrative report and where an LA receives a poor outcome following a full ILACS and is placed in intervention, the monitoring reports that follow also take a narrative approach offering a much more nuanced view of performance. ADCS members felt this more strengths-based approach should be adopted more widely across all forms of inspection and regulation.

Contextualising judgements across all settings, providers, ages and stages is vital in understanding how services are developed, delivered and are performing. Considering demographics and the local needs profile in education inspections would offer insights into inclusion. Providing context at an institutional or organisational level is important too; the independent evaluation of the implementation of the ILACS framework (University of Birmingham, 2019) notes that the context of a place is shared with inspectors, but this rarely finds its way into reports.

In recent years there has been greater recognition of, and work on, discrimination and disproportionality in children's services. Growing numbers of LAs are exploring anti-racist practices but inspection does not yet routinely consider the specific responses for, or the outcomes of, different groups or cohorts of children, for example, global majority children and families, who live locally and attend a school or engage with children's social care. An example raised in feedback was the differential outcomes in terms of timeliness of adoption for children from global majority backgrounds, or with different protected characteristics, as well as the need for more granularity in looking at referrals and re-referral rates at the start of the system. Case files may not provide the necessary insights so changes to the Annex A request would be needed if we are serious about addressing disproportionality and disparity of service.

Ofsted has hitherto avoided a focus on funding, but the impact of 14 years of austerity on local government, on schools, communities and on children's outcomes is undeniable. As is the ability of LAs to respond to the rising levels of needs in our communities in the current financial context. Similarly, approximately two thirds of LAs are in some form of financial intervention from the DfE under either the Safety Valve or Delivering Better Value processes. This reality is not considered as part of the ASEND framework, nor it is a feature in reports.

ADCS members discussed the potential for reintroducing the 'capacity to improve' judgement previously utilised in the SLAC framework across the full range of current frameworks. This would allow inspectors to consider contextual information, e.g. the impact of longstanding national funding formulae variants that result in some areas receiving more, or less, funding than others, this applies to per pupil funding in schools as well as high needs funding for an area. In relation to an LA, being in Section 114 territory, or the fact a relatively new leadership team has recognised challenges and drawn up improvement plans, but the impact of this work is not yet evident, could also be a consideration here.

An inspection is, by definition, a snapshot in time, yet the current approach allows little room for the benefit of the doubt. Drawing in data, testimonials and views of children, young people, families, professionals and partners would better allow for the triangulation of findings and offer assurance that judgements are robust. ADCS members raised concerns about the survey approach in ASEND inspections, which introduces a significant element of subjectivity that could usefully be triangulated with data. The scale of survey responses being received is unprecedented and there does not seem to be a validation process that focuses on current experiences, nor is there a right to reply to any issues raised via this channel. Plus, the findings of the survey have not routinely been shared back with the partnership, but these insights would contribute to future planning and improvement efforts.

There was broad consensus across all meetings that there is not yet a strong enough focus on the child's voice in the ILACS, JTAI or ASEND frameworks, with surveys and virtual meetings frequently relied on.

5. Does the number of good and outstanding grades indicate system quality?

As stated, ADCS has challenged the use of single worded judgements, particularly when assessing complex systems such as children's social care or SEND. When a school is judged to be outstanding, it does not mean that there is no room for improvement or that every child has the same wholly positive experience or outcomes. The same applies to LAs, to children's homes and to childcare settings. Supporters of this approach often cite ease of accessibility for parents and carers, but this is too simplistic, and can be misleading.

ADCS maintains that the continued use of single worded judgements places undue pressure on leaders of these services, whether a headteacher, a DCS or a registered manager of a children's home, who rightly or wrongly, feel this judgement is theirs to own and hold alone. This can have significant consequences for leaders of all services for children. Given the tragic death of a headteacher and a subsequent coronial inquest is the backdrop to this consultation, it is understandable that schools are centred in both debate and this exercise. However, it is important that the wellbeing of all leaders is genuinely considered across all frameworks and in any plans for change arising from this consultation.

6. Ofsted should have the power to inspect groups e.g. MATs, childcare or placement providers

ADCS supports the ability of Ofsted to look at the contribution MATs, or larger providers of childcare or placements for children in care, make to children's outcomes and their use of public funds. In recent years there has been a trend towards business mergers and acquisitions giving rise to some very large providers and an expansion of private equity investment in children's homes, which is increasingly being seen in the childcare sector too. Current inspection frameworks do not take account of this new reality nor is some of unacceptable behaviour that is apparent actively challenged e.g. placement providers serving 24 hours' notice on a child in care, adding to their trauma and rejection.

The ability of to inspect groups of providers would also allow for Ofsted to take an umbrella view across a whole provider network, enabling them to bring evidence together to understand whether performance issues or concerns of failure are isolated incidents or indicative of systemic failures. Without this oversight, there is a risk patterns of concern and indeed scale may not be identified.

7. Ofsted's openness to feedback and reflections on how easy it is to do this to support improvement

The opaque nature of the longstanding complaints process following an inspection was a commonly raised concern across all ADCS meetings. There is little information and few insights available to LAs about the evidence base used to arrive at judgements or the QA and moderation process. Judicial review has hitherto been the main avenue available to seek an independent review of an inspection outcome, however, it is noted that a new independent complaints process as well as plans to regularly audit complaints have recently been announced. These developments are welcome, but it will be important to understand whether the concerns raised by the sectors Ofsted inspects and regulates are being sufficiently addressed as a result.

Greater transparency around QA and the post-inspection moderation process is also needed. Multiple DCSs shared examples of verbal feedback at the end of fieldwork not reflecting the outcome of the final written report, which is difficult for practitioners and leaders alike to both understand and manage. Leaders also shared examples of judgements and reports changing during the moderation process without a clear rationale being shared for these changes.

In the future, ADCS members felt that follow up surveys with the inspected and regular evaluations and independent research to understand the implementation and impact of inspection frameworks and activity would be helpful feature of the system.

8. How can Ofsted best raise standards and improve lives for children?

Looking across the four nations, the other inspectorates in Scotland, Wales and Northern Ireland appear to have a more central focus on improvement of services and crucially of children's outcomes. In the English context, ADCS members observed that there is a stronger focus on learning from inspection in the education system when compared to inspection in the social care system.

Thematic inspections in children's social care made a helpful contribution to social work practice, local service developments and informed national policy developments as well. However, since the introduction of the multi-agency JTAI, use of thematics has become more ad-hoc and sporadic. The ASEND framework allows for thematic reports, outside of this the most recent examples of thematic reviews were commissioned by the DfE to look at regional adoption agencies (2024) and sexual abuse in schools and colleges (2021). In the education arena, Ofsted produces regular [curriculum research reviews](#) to: "support and inform those leading the thinking on subject education in our schools," with nine such reviews being published since the start of 2023. Taking a similar approach to other areas of Ofsted's work would be helpful to feed into established sector-led improvement activity via regional alliances in children's services.

9. Specific feedback about the inspection of education settings

In the education arena, the approach to reporting was agreed to be the strongest to date in terms of meeting the needs of school leaders, parents and carers and other key stakeholders, such as the LA. The focus on research and improvement in education was also picked out as a strength.

The education system in England is increasingly fragmented and schools operate in a more autonomous and competitive environment, which has come at the expense of inclusion. Recent reforms have not paid enough attention to the needs of learners who are not well suited to a high stakes system that prizes academic attainment and inspection outcomes above all else. The EIF

sought to stop practices that marginalise disadvantaged and vulnerable learners, such as children in care or with SEND, but these cohorts remain far more likely than their peers to be excluded. ADCS has previously called for Ofsted to introduce an inclusion profile as part of future inspection frameworks to ensure schools accurately reflect their local child population and therefore meet the needs of their local community ([ADCS, 2023](#)).

ADCS members also felt a stronger focus on children who have left the school, and the reasons for leaving, since the last inspection would offer insights into inclusion. Often “parental choice” is recorded but some parents and carers say they felt they have no choice but to move schools or home educate due to fear of fines or exclusion. This is worrying given the significant increases in home education.

Inclusion has strong links to safeguarding both inside and outside of the school walls. It is about more than pupil behaviour as schools have an important role as a protector but also disruptor of risk and harm. Another lens on both inclusion and safeguarding discussed in the education focused consultation event related to inspectors paying specific attention to attendance and ensuring a full-time education for all pupils and learners, with clear transition plans where this is not possible.

In schools, the impact of a double ‘RI’ judgement can be greater than a school being judged inadequate for a second time, with the continued use of academisation as the main tool for improvement used by the government. This again serves to raise the stakes for school leaders.

In terms of **early years** settings, a stronger focus on the development of children, with a specific lens or focus on those with additional needs, was called for by ADCS members. It was also noted that greater granularity would be helpful to understand how the different needs of the youngest children and those who are pre-school age are being met. Understanding links with education and health partners as well as local family hubs or children’s centres are important when assuring early years provision. It was noted in discussions that there is an incongruence in the majority of settings and providers being rated as good or better and the concerns being raised by school leaders about children’s readiness to learn when they enter primary education.

In terms of **initial teacher education**, a greater focus on practice, quality, support and an evaluation that looks at the progress of former trainees in the profession would help come to a more rounded view about impact and effectiveness of providers. Focusing on how to develop and deliver a curriculum that is based on needs was raised in feedback. Given the growing shortages of teaching staff in a growing number of subject areas, understanding efforts to recruit and retain trainees and qualified teachers in certain or specific subject areas was also suggested.

10. Feedback on safeguarding in schools

Safeguarding is a fundamental part of leadership and governance, so ADCS members felt that detaching it from leadership and management could result in it having a lower profile. If disaggregation is supported by the majority of respondents to this consultation, then making it a limiting judgement was discussed, but there was no clear consensus about this at the education focused event.

The proposal to hold back a report and revisit a school if deficiencies in safeguarding are found during the first inspection was felt to be a risk; deficits or gaps in policies or recording could be addressed in three months but systemic failings could not. Delaying publication may also serve to increase parental anxieties, media attention and therefore stress on school leaders.

It was noted that looking at safeguarding once every four years risks the experiences of an entire year group at an infant school going unassured, but the resource implications of an annual safeguarding visit would likely be prohibitive. So, a more dynamic, risk assessed approach that

takes into account e.g. new head, new governing board, new sponsor or significant event, was proposed by ADCS members.

LAs have previously been asked to volunteer soft intelligence about schools during an inspection, whilst the LA may hold insights into e.g. inclusion, systemising this process would be more transparent and consistent. Setting some expectations or parameters around the ask would be helpful noting the variation in LA capacity as funding to support school improvement has been reduced or removed altogether in recent years. An unintended consequence to guard against would be the closer working relationship LAs have with maintained schools, which could skew insights.

11. Specific feedback about the inspection of children's social care:

There was widespread agreement that the **ILACS** is one of the strongest frameworks used to assure the work of children's social care to date. The use of more regular touch points and the ongoing dialogue and relationship with the regional team has shifted inspection from a single event once every few years to a continuous process, with a lens on specific areas of practice via the focused visits. However, ADCS members felt reporting could be more strengths-based; the framing and presentation of ILACS reports feels tangibly different to education reports or those for short breaks providers and adoption services.

KIT meetings during the ILACS were felt to be helpful but an unintended consequence of these happening at the end of the day means that staff are often working late or overnight to pull together evidence to support or counter emerging findings, which adds to the anxiety levels and the overall burden of inspection. Holding the KIT the following morning would allow the LA to respond during the working day and was felt to be beneficial for inspectors too in allowing time and space to form and reflect on their feedback. In at least case, a DCS reported the use of morning KITs during a recent ILACS, noting this was preferable and avoided a late, or indeed a sleepless, night.

Multiple ADCS members cited examples of inspectors extrapolating findings from a small number of cases in a focused visit, or a JTAI, to make a judgement on an entire service or system. Drawing in a greater mix of evidence and ensuring appropriate triangulation would make findings more robust.

The principle of assuring multi-agency working was supported by ADCS members but there was a broad consensus that the calibration of the **JTAI** is not yet right. It falls on the LA to manage the JTAI process and to lead subsequent improvement plans again with few levers to influence partners in practice. Feedback meetings involving all the inspectorates and partners were described as akin to "wedding receptions," and scheduling a fine art. The current approach also does not easily allow medical professionals with clinics or children who are at school to engage or be engaged in the 9am – 5pm schedule of inspectors. A challenging JTAI outcome can damage partnership relationships, which is clearly not an intended outcome.

In relation to the **SCCIF**, there was a call for a stronger focus on inclusion for children and young people with the most complex needs, noting the lack of incentives for providers to work with those facing harms outside of the home. This cohort are perhaps most directly and personally impacted by inspection activity, which can result in a short notice move, jeopardising short term progress and longer-term outcomes.

Over the years, the placement market has changed significantly in ways that are well rehearsed and clearly captured in Ofsted research on the sufficiency challenges facing LAs ([Ofsted, 2022](#)). However, ADCS members felt that this awareness isn't always evident in inspections. Whilst it is right to have high standards and expectations this also needs to be set in the context in which LAs are operating.

There was a view from numerous ADCS members that children's home inspections are overly focused on compliance with increasingly outdated regulations rather than the progress and experience of children. There is too much emphasis on children's behaviours and too little recognition of the impact past abuses and trauma can have, and how this can manifest. Again, a more strengths-based approach to reporting that recognises the distance travelled and the aspirations staff have for the children in their care was called for. There is a strong focus on "matching" at the point of a placement being made but not yet enough attention on how placements end for children, which is too often abruptly with little or no notice.

Again, there was a strong view that reports and findings need to be contextualised. For LAs, this should take in the corporate and political context as well as demographics e.g. deprivation. It's right to have a strong focus on children's experiences and outcomes but the context can no longer be ignored. For providers of all placements for children in care, this might include information about ownership and finances, particularly where there is private equity backing, the extraction of huge profits and growing levels of debt.

12. Specific feedback about ASEND inspections

ADCS members agreed that the ASEND is perhaps the most complex and challenging inspection Ofsted currently undertakes. It is an assurance of local systems and partnerships that are in crisis as captured and described in detail in the government's SEND Review, green paper and subsequent improvement plan. The foundations of the system, including a clear vision and narrative, commensurate resources and sufficient workforce are not present, but judgement inspections persist.

Unlike children's social care or education, there isn't yet an agreed understanding of "what good looks like" in this space. And, despite being a multi-agency, multi-inspectorate endeavour, the improvement notice is only directed at the LA when the partnership is found to have widespread and/or systemic failings.

Given all this, ADCS members believe that the ASEND inspection should be paused whilst work is undertaken to fundamentally rebuild the foundations of the system. In the interim, a series of thematic visits could be used to provide some assurance whilst identifying innovative practice and learning to support improvement in local areas and the development of new policy at a national level.

ADCS members again focused on the importance of inclusion, noting the disconnect between the majority good or better outcomes of school inspections and the findings of ASENDs; both cannot be right. There are also some perverse incentives and barriers acting against inclusion and improvement e.g. the radical changes to school structures and governance in recent years. There was concern that children who are not in school, especially children with an education, health and care plan who are missing education, or who are home educated, are not sufficiently visible in either education inspections or the ASEND.

While there is an attempt to hear the voice of children and young people in the framework, in practice this feels unsatisfactory as virtual engagement meetings are typically scheduled during the school day. In the future, the approach here needs to be more in line with the needs and preferences of children and young people.

As already stated, there were concerns and queries frequently raised in ADCS meetings about the weighting put on parental views and organised lobby groups responding to the survey used in the ASEND. It was suggested that practice is brought in line with other frameworks e.g. the ILACS generally looks at the last six months of activity. If this was replicated in the ASEND, this could help mitigate against historic issues or challenges encountered years ago being used as evidence of current practice and experiences.

Finally, the group noted where concerns arise about a specific child's plan, there is less systematic practice than in the ILACS in terms of the provision of case numbers so the LA can follow up and provide additional evidence to inspectors.

13. Concluding remarks

Looking across the totality of inspection activity there incongruence, contradiction and inconsistencies between various frameworks and different methodologies can be seen. Over time new layers of inspection have been added by different governments, often in response to failings or tragic events, but the narrative or rationale for the system looking and working as it does is absent. How little or no notice inspections have become the norm was frequently cited as an example of this. ADCS members do not shy away from accountability, but The Big Listen offers an opportunity to take stock and ensure that inspection and regulation activity is positively contributing to children's lives and outcomes and that it is supporting whole system improvement.

Several years ago, ADCS, along with the LGA and Solace, published a joint policy position paper on inspection, which articulated the main functions of inspection and some guiding principles, which still stand nine years later ([ADCS](#), 2015):

1. **It must facilitate a learning culture that supports LAs to develop their services and drive improvements in outcomes for children** - *Open and transparent quality assurance processes between inspector and inspected and between findings 'in the field' and moderation; greater use of thematic studies, particularly focused upon issues that all local areas struggle with; identification of good practice.*
2. **It should ascertain whether the range of services being provided lead to better outcomes for children and their families and that inherent risks are being appropriately managed** - *Children's outcomes are paramount no matter how they are procedurally achieved; it is not possible to eradicate risk, but it can be managed and the making of judgments require current, or at least recent, leadership and practice experience.*
3. **It is a vehicle through which public sector organisations are held to account for the effectiveness of outcomes achieved for children and their families in relation to expenditure** - *Given the scarcity of public funds, inspection findings should comment upon the effectiveness of the outcomes achieved in relation to expenditure; the smarter use of metrics – nationally collected and local data.*

To discuss any of the issues raised in this response with members of ADCS, please contact the relevant policy officer, Katy Block, in the first instance via katy.block@adcs.org.uk.