

Friday 5 September 2025

ADCS response to the local government outcomes framework 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 is committed to the principles of equity, diversity, and inclusion which are fundamental to all areas of our work. We are committed to highlighting issues of disproportionality, discrimination and systemic barriers that limit opportunity where they exist, recognising that not all children, young people and families are impacted equally. ADCS welcomes the opportunity to respond to this Ministry of Housing, Communities and Local Government (MHCLG) consultation on draft plans for a new local government outcomes framework.

2. General comments about the framework

MHCLG has selected indicators that already exist to reduce burdens; however, this aim will only be realised for children's services if there is alignment with the Department for Education's (DfE) timelines for the submission and/or publication of these data. If a single submission date is set for all metrics across all 15 outcomes, local authorities (LAs) will either be duplicating efforts or submitting unverified, and therefore less reliable, data.

This may result in data included in this framework not matching the DfE's final publication. It is unclear whether there would be any consequences or penalties for mistakes in unvalidated data being submitted before it has been smoothed out over a longer timeframe - there is a lag of several months between the submission of key children's social care datasets to DfE and final publication. MHCLG requiring submission of data through new or different channels or processes would be a new or additional burden.

ADCS members also noted that the framework does not yet provide a strong focus on partnership working, which is limiting. Many of the outcomes listed, particularly in relation to public health, can only be delivered in partnership with other agencies. MHCLG has suggested the framework could provide a lever for LAs as place leaders, however, this would require a different and clearer narrative plus levers for change e.g. shared accountability.

Detailed comments on specific indicators relating to children and children's services can be found later in this submission. ADCS members noted that whilst many of the metrics selected are broadly as expected, many are process- and/or activity-focused rather than outcomes-focused, and there are no quality indicators outside of the Ofsted scorecard for schools, which is not yet in use.

The consultation states that the framework is to be used by the public and central government. The needs and understanding of each of these audiences are very different and it is not clear from the proposals how these will be met in a single tool or publication. And, while the principle of a holistic, outcomes-focused framework is helpful, in practice this could become a significant burden if the departments and team(s) reviewing these datasets do not understand the context of children's services and local areas. ADCS members have noted that there is some learning to draw on from the various ad-hoc surveys and reporting requirements stood up across government during the Covid-19 pandemic period.

Children's services are about to enter a period of great uncertainty and change as a result of government reforms. Layered on top of this is local government reorganisation being pursued at an unprecedented pace and scale, adding an extra layer of complexity for over 40 LAs. Other key public services and safeguarding partners are also being reformed, most notably health.

Some LAs are already piloting and pathfinding elements of children's social care reform, so their metrics will differ from usual rates or levels, making comparisons with previous performance within the same LA, across regional groupings and/or for national benchmarking purposes increasingly difficult.

This new framework is due to come into force in April 2026, which will be the first year of transition in the children's social care reforms. Whether, and how, this affects child protection activity, as well as the numbers of children in care, remains unknown. The policy intent is for a greater focus on prevention, leading to reductions in episodes of care; however, these gains could be ameliorated by ongoing impacts of a decade and half of austerity, increasing deprivation, or the policy decisions of other departments, leading to a potentially confused picture. Changes to the education system, including special educational needs or disabilities (SEND), are also expected soon, meaning 'established norms' will be replaced by a similar period of uncertainty.

Some concerns were shared by ADCS members about the mixed approach to use of actual numbers, rates, and percentages; in a small area, falls or increases involving a handful of children can appear dramatic.

Children's services are highly regulated and accountable to the DfE, Ofsted, as well as local politicians and residents; clarity about how the framework fits with the existing accountability terrain is needed.

The final version of the framework would benefit from a data development section to emphasise that further refinement is needed in specific areas of interest where data is not yet available, developing or incomplete.

Over time, as the framework is introduced and beds in, it would be helpful to have a route or forum to propose new metrics or insights that could be included e.g. generational experiences of care.

3. Specific commentary on the homelessness and rough sleeping outcomes

Number of households with children in temporary accommodation	Rates, rather than numbers, would be more useful to LAs for benchmarking purposes to help understand local performance.
Number of families in B&Bs over six weeks	As above.

4. Multiple disadvantage outcomes

A significant number of children, young people and families involved with children's social care are experiencing domestic abuse, poor mental health and substance misuse. In feedback, some ADCS members suggested the development of further data sub-sets to support shared ownership and collective responsibility for improving the outcomes of parents and carers, as well as care experienced adults.

5. Best start in life outcomes

The original programme guide determined that family hubs were for families with children aged 0 – 19 years old, rising to 25 years old if the child or young person has additional needs or disabilities. The framework focus is very much on the early years and the early childhood context, which risks

confusing policy intentions. This limited focus is also at odds with the new guidance on *Families First for Children Partnerships*, which positions family hubs as the frontend of the reformed system.

To strengthen the framework, some ADCS members suggested disaggregating data by deprivation and rurality to provide meaningful insights for places with more dispersed populations, mirroring proposals included in the new the local government funding formula.

On the ask about family hubs metrics or insights, an important contextual factor is whether the LA received funding for family hubs over the last three years, or not. Starting points will vary from place to place and should be considered.

ADCS members felt that the use of public health metrics included elsewhere in the draft framework could be used to gain insights into the reach and impact of family hubs e.g. oral health and childhood obesity, to complement those in development.

6. Every child achieving and thriving outcomes

KS2 attainment (maths, reading, writing) for LA maintained schools	<p>There were mixed views among the ADCS membership about whether all state-funded schools should be included here or none; however, there was agreement that excluding academies offers only a partial view.</p> <p>The inclusion of all schools would speak to the plans in the <i>Children's Wellbeing and Schools Bill</i>, which will give LAs a clearer and larger role in the education system and see closer alignment of rules, guidance, and expectations for all state funded schools.</p> <p>In practice, LAs have no statutory powers to intervene and limited levers to influence strategic direction, governance, or leadership of academies and trusts.</p>
KS4 attainment (Attainment 8 data) for LA maintained schools*	<p>As above, it is possible that the majority, or even all, local secondary schools are academies, meaning figures would be blank or partial, so system-level insights would be limited.</p> <p>The education landscape has shifted significantly as a result of academisation policies. While LAs have certain statutory duties in relation to the sufficiency of school places, safeguarding, or promoting the outcomes of vulnerable pupils, for example, they do not hold accountability for academy schools.</p> <p>Reforms to school structures have created disconnect between the measure and the measured. LAs are being judged on factors they cannot control, while the true agents of school improvement, such as DfE Regions Group and the boards of trusts, are not held similarly accountable. This represents an accountability gap.</p>

Percentage of young offenders who go on to reoffend	This is outdated language and not child first. It is preferable to say <i>children in conflict with the law</i> .
Ofsted report outcome for LA maintained schools	<p>As above, either all state funded schools in a locality should be included, or none.</p> <p>Ofsted inspection cycles take several years to complete, so data relied upon here could be dated and inaccurate. Additionally, changes to the inspection framework have resulted in shifts in what is being measured, creating variability and making comparison unreliable.</p> <p>A more balanced approach could seek to triangulate Ofsted outcomes with a wider set of performance indicators, aligned to the statutory role of the LA.</p>
Participation in youth services	<p>There is no obvious youth services metric at this time, given the mixed economy of delivery and commissioning.</p> <p>Many LA youth services have been severely impacted by budget cuts under previous governments, resulting in stark inequalities in access and provision. This will provide only a partial picture of what is available in real terms and could lead to misinterpretation from the available data or a NIL return in many cases.</p>

On education, some ADCS members proposed additional metrics to better reflect the role and impact of LAs on education. These included a sharper focus on the progress and attainment of vulnerable groups, such as children in care or those with SEND. Other suggestions included a lens on school sufficiency, fair access and post-16 destinations, as these things are directly influenced by LA strategy and local partnership working.

The focus in this section is very heavily on education as well as young people who are a “problem” i.e. involved with the youth justice system. This section would benefit from the inclusion of metrics that highlight the importance and benefit of informal learning to young people’s development e.g. volunteering. A lens on participation is not likely to achieve this aim. ADCS would welcome further discussions with DCMS on this.

On the ask around a metric to include here on the LA contribution to youth justice services, it is important to note that youth justice services are part of children’s services. Whilst multi-agency in nature, the team and duties sit primarily with the LA. A focus on community sentences / orders is most helpful here, as LAs are holding significantly more risk in the community due to the dramatic decline in the custodial population over the last 10 to 15 years. ADCS would welcome a further discussion with the MoJ on this.

There may also be merit in including a lens on diversionary activities, but with a variety of approaches in both practice and recording e.g. the use of Outcome 22 rather than community resolutions, will make comparisons more difficult.

7. Keeping children safe outcomes

Rate of children in care per 10,000 children (for unaccompanied asylum-seeking minors, and non-UASC children)	It is helpful to have a lens on episodes of care for UK citizen children and on unaccompanied asylum-seeking children (UASC), as entries to care for the latter cohort are unplanned and driven by national immigration policy e.g. the national transfer scheme.
Percentage of children who leave care due to SGO or CAO arrangements	Care arrangement orders (CAOs) are more commonly used in private rather than public law so this is not likely to provide meaningful insights into kinship care, if that is the intention.
Percentage of child protection plans which are a second or subsequent plan	<p>It is important to understand whether the plan is for a different reason or the same reason. Consecutive plans for different reasons can be seen as a positive rather than a negative, as the system is correctly identifying need as family circumstances change.</p> <p>It should be noted that LAs would generally look at this over a specific time period, such as two years, to understand service impact and performance.</p>
Percentage of children in care with three or more placements during the year	This headline metric will not distinguish between voluntary episode of care under Section 20 of the <i>Children Act 1989</i> and does not consider that moves might ultimately be positive, to meet changing needs, or if the final placement is to a long-term arrangement, and therefore, could be misleading.
Percentage of care leavers in suitable accommodation	It should be noted that custody does not count as suitable accommodation. This placement is not the LA's decision, it is made by the criminal courts.
Percentage of children living in foster, residential care, or secure children's homes	<p>Reporting the percentage of children with a secure children's home placement will not provide meaningful insights. There are only 200 beds nationally, so it is likely this number will be so small in most, if not all, LAs it will be suppressed.</p> <p>On the use of residential care, it is important to note that children's homes are not a last resort; they hold an important place in the system.</p> <p>Rather than look at the percentage of children placed in different types of placements, some ADCS members suggested a focus on placements at distance instead.</p>

Percentage of local authority spend not on children in care	<p>It is unclear to ADCS members what the value of this metric is in understanding LA performance?</p> <p>With increasing costs of provision, percentages may appear stable, however, the actual spend is increasing if fewer children enter care but the costs of packages increase, this insight is then lost or hidden.</p> <p>The inclusion of this measure will require a clear definition to support the submission of consistent, and therefore comparable data, given the arrangement of local services and budget responsibilities differ from LA to LA. To illustrate, home-to-school transport is a significant and growing budget pressure - in some LAs this falls under children's services, whilst in others transport teams commission these services. LAs treat other expenditure e.g. on children's centres or youth work, differently too.</p>
Workforce vacancy rates	<p>Some ADCS members felt that the veracity of a single vacancy rate is questionable, as it is both limited and potentially misleading.</p> <p>In contextual information, it is important to note that vacancy rates are heavily influenced by national labour market conditions, cost-of-living factors, geography, and the availability of agency staff, which are often beyond the control of individual LAs.</p> <p>Headline vacancy measures do not account for caseload pressures or skills mix, which impact both the effectiveness and consistency of support for children and families.</p> <p>Children's social care reforms promote the use of alternatively qualified practitioners in the family help space. It is not clear what impact this will have in the longer term on workforce patterns and trends, so this should be considered in the contextual information.</p>

Several ADCS members suggested including some adoption measures to reflect the full range of permanence outcomes, which could include timeliness metrics as well as the percentage of children achieving permanence via adoption.

8. Child poverty contextual metric

On the ask around child poverty, the Income Deprivation Affecting Children Index (IDACI) was put forward as a suggestion, although this is not updated regularly.

Many LAs use the number of children eligible for, or claiming, benefit-related free school meals, which are at record levels, as a proxy measure of deprivation. While this doesn't necessarily offer a lens on LA impact, it is available more frequently than other national metrics e.g. IDACI. However, it was noted this metric excludes children whose parents don't qualify for free school meals but who are struggling with the rising costs of living.

ADCS members underlined the need to include housing costs in calculations of child poverty to ensure that those living in highly urban, and some rural, contexts with very significant housing costs, are accurately captured and reflected here. This is supported by research which notes that housing is a more significant contributing factor to poverty in England than in other UK nations ([JRF, 2025](#)).

Child poverty impacts on outcomes, most notably health and education, so this could be an important part of the narrative or context accompanying the framework.

9. Commentary on the open consultation questions

In terms of how best to use the framework, rather than having quiet conversations with LAs, ADCS members felt it could be a tool to help MHCLG track and understand government performance and how national policy decisions and reforms are working in practice or highlight areas where policy focus and attention is required. Previous research has highlighted the lack of focus on implementation, or an "implementation gap". Government has an important role in creating the "conditions for success" in local areas.

Used well, the framework could become a self-assessment and planning tool for LAs; however, the government need to tread with some caution. There has been a push, post-pandemic, for more regular reporting of data, but current systems, and the way data is collected via large annual statutory returns, does not support this drive.

ADCS members welcome the inclusion of local and contextual information about a place. Suggested items to include here are: deprivation indices, local housing/market pressures, population make up, growth and employment market position/conditions. Allowing for local narrative alongside metrics to account for regional variation, particularly in rural and coastal areas, was also suggested.

Including a lens on early or family help would offer a lens on preventative work that stops the escalation to statutory services. A keener focus on children's mental health was also suggested, although some of the proposed metrics and areas of interest lie outside of the LAs scope of influence or role e.g. access to mental health services.

To discuss any of the points raised in this submission, please contact the relevant policy officer in the first instance via katy.block@adcs.org.uk.