

Solace response to the consultation on *'Integrated inspection of services for children in need of help and protection, children looked after and care leavers and joint reviews of LSCBs'*

16th September 2014

Introduction

Solace is the representative body for over 1300 Chief Executives and senior strategic managers working in the public sector in the UK. We are committed to promoting public sector excellence. We provide our members with opportunities for personal and professional development, and seek to influence debate around the future of public services to ensure that policy and legislation are informed by the experience and expertise of our members. Whilst the vast majority of Solace members work in local government we also have members in senior positions in health authorities, police and fire authorities and central government.

In May 2014, Solace set out its views on the future approach local government and the wider public sector should take to improving the lives of children and young people. ['Reclaiming children's services'](#) also set out the Society's views about strengthening sector led improvement & the development of a new, localist assurance regime.

Summary

- While we share the ambition to create a more joined up-multi agency inspection regime, these proposals do not come close to achieving this.
- We agree that an inspection regime which properly reflects the contribution of all local agencies is important; however we believe the proposals as set out will only achieve this in a limited way. Furthermore, they will do so only at a potentially significant cost in terms of the resources needed by LAs and other local partners to support inspection activity.
- We also have concerns about the extent to which integrated inspections will be truly integrated. Aligning timescales and written judgement structures will only achieve so much. Genuinely integrated approaches require continuous learning and development, conversation and challenge across inspectorates.
- We also continue to believe that the production of a single judgement (beyond 'above' or 'below the line') is an overly simplistic assessment of a complex, multi-faceted set of services. We continue to support a 'narrative judgement' model (as advocated by other sector bodies, including ADCS).
- We do support the intention for a single, shared judgement about the effectiveness of LSCBs, subject to some detailed points of information.

The mechanics of an integrated approach

Solace welcomes the intention of these proposals, to achieve a more multi-agency view of local arrangements and to seek to reduce the inspection burdens for local authorities and their partners. A truly multi-agency, outcome focussed inspection would be welcome, however we have a number of concerns about the proposal as set out.

Firstly, we have concerns about the logistics and resource demands of the proposals on local authorities and their partners. We are already aware of concerns in some local authorities that the demands of the SIF process during the four weeks are extremely high. Adding in additional inspectorates could easily add to this burden.

Feedback we have received from some of our members involved in the multi-agency inspections indicated that burdens were not necessarily reduced. Further, feedback from some LAs indicated that they felt they had taken a disproportionate share of the logistical burden. We would welcome further detail about how the different inspectorates involved will work together to coordinate their approach and ensure that demands are proportionate on everyone involved.

Secondly, we have previously indicated our concerns about the variability of the quality of inspectors across the workforce and consequent impacts on the consistency of inspections. While we recognise that any workforce will vary it seems logical to assume that an increase in the number of individuals in an area at any one time will increase the opportunity for inconsistency or poor communication between different inspectors and inspectorates. We would urge all inspectorates involved to consider specific measures to help address this challenge.

Achieving integrated judgements

Solace remains to be convinced that simply conducting a number of inspections in parallel will achieve the desired outcome. While the consultation does focus on harmonising the judgement structure, inspections depend, in reality, on much more than the criteria laid down on paper. They are a function of the professional judgement and interpretation of inspectors. We therefore have concerns about the proposed approach, whereby different inspectorates will operate, it seems, quasi-independently and issue separate judgements. Feedback from members involved in the pilots raised concerns about different inspectorates 'doing their own thing' with a lack of sufficiently joined up or common approach.

We would suggest that if such an approach is pursued, every opportunity is taken to allow for challenge and continuous engagement between different inspectorates – through joint learning and development, regular meetings during the inspection process and clear mechanisms of collective debate and decision making. Otherwise, we fear that judgements will, in reality, continue to be a collection of individual statements – not a collective narrative about the performance and practice of a place.

Local Safeguarding Children Boards

Given our above concerns, we welcome the proposal for a shared judgement about the effectiveness of LSCBs. Given the multi-agency nature of Boards, this seems only appropriate. However, as above we would ask for further reassurance about how the process will ensure judgements are genuinely system-wide and multi-agency.

We would also welcome assurance that - while judgements clearly articulate a system-wide view of effectiveness – the underpinning narrative and supporting statements effectively delineate the contribution of different local partners and agencies to the overall judgement. This is important in allowing local partners and the public to understand how different parts of the system are contributing to the LSCBs work.

We would also, as with earlier comments, urge inspectorates to be aware of the resource demands on LSCBs. They are, in practice, partnership boards with a part-time chair. Any demands made on them will reduce the time they are able to spend scrutinising and challenging their local safeguarding system and, as such, must be proportionate.

Relatedly, we would wish to be assured that reviews and judgements focus on the role for LSCBs laid down in statute (i.e. as a strategic oversight and scrutiny body). Anecdotal feedback from the LSCB reviews conducted as part of the SIF process has indicated that inspectors in some areas have had unrealistic or unreasonable expectations about the degree to which LSCBs could or should involve themselves in operational decision-making.