

▶ Joint Targeted Area Inspections

▶ Response by London Councils

London Councils represents London's 32 borough councils and the City of London. It is a cross-party organisation that works on behalf of all of its member authorities regardless of political persuasion.

Introduction

London Councils recognises that progress has been made in Ofsted's position in respect of offering a narrative rather than graded judgement. This is a welcome change which we would encourage more widely within the current suite of inspection frameworks. However, Ofsted's proposals fall short of adding the value which we believe the inspectorate, and partners in other inspectorates, no doubt wish to bring to our multi-agency work to protect children and young people.

Specifically, it is unrealistic to expect London boroughs to accept the adjustment from graded to narrative judgements as fair compromise in the context of introducing an additional inspection burden on our sector, which we believe the Joint Targeted Area Inspection (JTAI) would do. It is clearly not proportionate to retain the current Single Inspection Framework alongside the introduction of a JTAI and, potentially, a Single Agency Targeted Inspection.

The proposals before us fail to make a convincing case that there will be no increase in the overall inspection burden to the system. On the contrary, the proposals appear to seek to introduce new arrangements which will simply run parallel to and duplicate those which local government and Local Safeguarding Children Boards are already subject to. This will create duplication and additional cost in time and resources with no obvious added value to children or local government therefore it does not warrant the additional costs burden on the national purse.

London Councils is unable to support the current proposals without a clear and upfront commitment to not increasing the overall inspection burden on local authorities.

However, while we do not accept the proposals set out by Ofsted, we hope our comments below will assist Ofsted in continuing to improve inspection arrangements and give us all the confidence that there is a credible and proportionate framework in place which truly recognises and forms judgements on the relative strengths and weaknesses of multi-agency arrangements to keep children and young people safe.

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Proposal one:

It is unclear how the inclusion of 'deep dive' investigations as part of this methodology is necessary. Ofsted already works with local authorities to conduct thematic inspections, including in relation to CSE, and has existing powers to initiate 'deep dives' as required. The inclusion of a 'deep dive' as part of this framework appears unnecessary and would duplicate assurance and evaluation which could be sought through Ofsted's current powers and practice.

Furthermore, we would expect judgements in relation to issues like CSE, for example, to be drawn from any multi-agency inspection as part of the broader framework. If there remain concerns that the broader framework does not allow Ofsted to draw credible judgements on such specific issues then this reflects a weakness in the framework which should not be resolved through bolting on a 'deep dive' investigation.

Should Ofsted insist on moving forward with a JTAI and wishes to retain the 'deep dive' component, it would be vital for local authorities to be seen as a statutory consultee in determining future areas of practice or groups to focus on.

Proposal two

Notwithstanding the overall view of London Councils that the proposal must not move forward without a wider overhaul of inspection arrangements, and our specific concern in relation to the inclusion 'deep dive' investigations, we do not agree that the Chair of the LSCB should be the first person notified. While the principle of moving towards seeking assurance of the quality of multi-agency arrangements is correct and the Board Chair has a vital role to play, the Chair of the local board is not the accountable individual for the individual services which make up the partnership.

Under any such joint inspection efforts must be made to notify the correct accountable individual at each of the statutory partners, although we accept the practical impossibility of doing so simultaneously. We are of the view that each of the different inspectorates will hold accurate and up to date contact details for the relevant service lead and therefore it should be possible to contact each within a relatively small window. While this may not be precisely simultaneously, we believe this is preferable and contacting the Board Chair could occur at the same time.

Proposal three

London Councils does not feel it is possible to comment on the draft methodology and timescales until such point as Ofsted has responded to and resolved our deeper concerns regarding the proportionality and value-added of the system as it would be constructed under the current proposal.

Proposal four

London Councils recognises that progress has been made in Ofsted's position in respect of offering a narrative rather than graded judgements. This is a welcome change which we would encourage more widely within the current suite of inspection frameworks.

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Notwithstanding our more fundamental concerns regarding the proportionality and value-added of the JTAI, we believe that it is important for Ofsted to provide a sense of priority in the issues identified. This is important in order to give clarity to the wider public about the relative quality of local services and in assisting local partners to action plan in response to any such inspection.

As we have already expressed our opposition to the proposed 'deep dive' investigations, we do not agree that a joint overview report should be published after each round of inspections that share a specific deep dive theme. Such an outcome (i.e. the production of thematic reports on specific issues) is achievable through existing Ofsted practice by using existing Ofsted powers in partnership with the system.

Proposal five

We agree that the most reliable source of information about practice should be their most recent inspection report. It is absolutely essential that a multi-agency inspection does not create duplication and must add to each of the statutory partners other inspection arrangements.

An improved methodology should give equal weight to the identification of good practice and areas for improvement, and through that route it would be right to draw from the system examples of excellence which could be shared with the wider safeguarding partnership nationally.

Part two – Ofsted's proposals for a single agency inspection

It is clearly not proportionate to retain the current SIF alongside the introduction of a JTAI and, potentially, a Single Agency Targeted Inspection. This will duplicate case file audit activity, with no obvious benefit to children or local government, and will draw staff and leadership away from front line activity to service the inspection. Neither will it provide sufficient additional information to national government or communities to warrant the additional costs burden on the national purse. We do not support this proposal.