

# Inspection of local authority children's services framework implementation review

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This paper presents the review of the implementation of the inspection of local authority children's services (ILACS) framework. The review uses a variety of methods to evaluate the extent to which the ILACS framework has been implemented as intended, including independent inspection shadows and interviews carried out by the University of Birmingham.

The review finds that:

- the ILACS framework provides a proportionate and efficient inspection system
- the inspection system rigorously investigates the social work practice of local authorities
- the judgements from standard and short inspections are sufficiently reliable
- our inspection reports are clear yet concise
- further work is required to support inspection teams to make full use of new methods and processes, ensuring that all teams consistently adhere to the framework.

This paper details the successes and challenges of the ILACS framework along with the changes we have made to improve implementation and adherence to the framework. The full report provided by the University of Birmingham is provided in Appendix 2. Appendix 3 details our responses to recommendations made by the University of Birmingham.

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## Contents

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<b>Introduction</b>	<b>3</b>
<b>Methodology</b>	<b>4</b>
<b>Findings</b>	<b>5</b>
Proportionality of ILACS framework	7
Efficiency	11
Inspection system rigour	11
Reliability of inspection judgements	17
Risk assessment processes	20
The on-site inspection process	24
Consistency of inspection reports and focused visit letters	30
Inspector well-being	33
<b>Appendix 1: Detailed methodology</b>	<b>37</b>
<b>Appendix 2: Independent Evaluation of the Implementation of Ofsted’s Framework for Inspection of Local Authority Children’s Services (ILACS)</b>	<b>41</b>
<b>Appendix 3: Inspection of local authority children’s services framework: University of Birmingham recommendations to Ofsted and Ofsted’s response</b>	<b>67</b>

## Introduction

1. We published the ILACS framework in November 2017 and implemented it from January 2018. It replaced the single inspection framework (SIF) for all inspections of LA services for children in need of help and protection, children in care and care leavers.
2. Inspections under the ILACS framework, as with the SIF, evaluate the effectiveness of local authority (LA) services and arrangements, including:
  - help and protection of children
  - the experiences and progress of children in care wherever they live, including those children who return home
  - the arrangements for permanence for children who are looked after, including adoption
  - the experiences and progress of care leavers.
3. Additionally, ILACS inspections evaluate:
  - the effectiveness of leaders and managers
  - the impact they have on the lives of children and young people
  - the quality of professional practice.
4. Under the SIF, we delivered a standard four-week inspection to all LAs. The ILACS framework is a more complex system of inspection. Our aim was to create a proportionate inspection process based on intelligence gathered throughout the year. The main differences between the SIF and ILACS frameworks are:
  - a move from a universal, four-week inspection to a more tailored inspection menu, which includes:
    - LA self-evaluations of social work practice
    - annual engagement meetings with LAs
    - focused visits (two days on-site)
    - monitoring visits of inadequate LAs (two days on-site)
    - joint targeted area inspections (JTAs)
    - short (one week) and standard (two week) inspections
  - more frequent, individualised contact with LAs to regularly assess risks and improvements
  - less focus on processes and a greater focus on social work practice; in practical terms, this is a shift from a greater number of meetings that made

- up SIF inspections to the aim of inspectors spending 80% of their time talking to social workers and directly observing practice
- inspection teams working together to collect, collate and evaluate evidence in all strands being inspected or reviewed; evidence collection and evaluation was much more individualised in SIF inspections
  - shorter, more concise inspection reports that aim to provide clear direction on areas for improvement rather than covering all evaluation criteria
  - lead inspectors being more involved in evidence gathering in ILACS inspections; this is alongside leading the team, dealing with the necessary administration and being responsible for inspection quality (with support from quality assurance managers (QAMs)).
5. This review is underpinned by Ofsted’s strategic guiding principle to be ‘a force for improvement through intelligent, responsible and focused inspection and regulation’.
  6. The objective of the review is to evaluate the extent to which we have implemented the ILACS system as intended. This work was preceded by an initial review to solve any teething issues in the rollout of the new framework. We will follow it up with an impact evaluation to measure the impact of the framework in improving children’s services.
  7. We sought to answer the following five research questions:
    - To what extent are inspector teams receiving and able to access adequate information to validly assess the impact the LA makes to children’s lives?
    - To what extent do published reports and letters provide a clear and concise summary of experiences and progress of children and the impact of services?
    - How consistent are our inspection teams at forming judgements, in the process of inspection and report writing?
    - How effectively and efficiently is the intelligence gathered through the whole ILACS system being used to determine a proportionate inspection programme
    - As a whole-inspection system, does the ILACS framework uphold the same standards for LAs as the SIF?

## Methodology

8. We took a mixed methods approach. This allowed us to gather qualitative and quantitative data and insights. When looking to gain a deep understanding of processes, strengths and challenges, we used qualitative methods. This allowed us to unpick particular scenarios and cases to give us a thorough understanding. In some instances, such as when gaining inspector feedback,

we complemented this with quantitative methods. This enabled us to demonstrate how widespread a strength or challenge was. When looking at consistency and reliability, using quantitative methods was more appropriate. Through using a variety of methods, we could triangulate data. A brief outline of the methods used is given below. Full details are available in [Appendix 1](#).

9. We collected data through:

- focus groups with over 30 social care (SC) Her Majesty’s Inspectors (HMI), nine SC regulatory inspectors (SCRIs) and nine education HMI
- surveys to SC HMI and senior HMI (SHMI), SCRIs, education HMI and analysts; all inspectors who were invited to participate had been part of an inspection team that had carried out a focused visit, short inspection or standard inspection
- reviewing standard and short inspection evidence bases to determine the reliability of inspection judgements
- reviewing 10 inspection reports and 29 focused visit letters; this explored consistency in content and tone as well as adherence to framework
- reviewing regional risk-assessment processes through case sampling with SHMI
- interviewing 16 directors of children’s’ services (DCS), including at least one DCS from each of Ofsted’s regions (East Midlands; East of England; North East, Yorkshire and Humber; North West; South East; South West; West Midlands; London)
- analysing the amount of ILACS activity (annual engagement meetings, focused visits, short and standard inspections) delivered in the first year of ILACS, including analysing the proportionality of activity based on LA inspection judgements
- analysing the efficiency of ILACS by examining the cost of the inspection workforce needed to deliver ILACS and the amount of engagement able to be delivered each year, compared with the equivalent cost and engagement under the SIF
- carrying out independent inspection shadows of two focused visits, two short inspections and two standard inspections in order to evaluate uniformity of practice and adherence to the framework; these were completed by academics from the University of Birmingham.

## Findings

10. The ILACS framework provides a rigorous, proportionate and efficient inspection system that thoroughly investigates LA social work practice. It has been welcomed by the sector, who see it as detailed and robust.

11. Inspectors are confident about delivering standard, two-week inspections. The judgements from these are sufficiently reliable. Short inspection judgements are also sufficiently reliable. However, inspectors report being more challenged by short inspections in the first year of the framework due to the significant change from four-week SIF inspections to one-week short inspections. We are therefore suggesting a few minor changes, to provide greater resource on short inspections where needed, which should alleviate some of the pressures.
12. There is still some work to ensure that inspection teams are consistent in their approach and adherence to the framework. This is not unexpected when implementing new methods and processes. We therefore suggest taking on-going steps, such as QAMs spending more time on site during inspections, to ensure consistency and reliability. SC SHMI take the role of QAMs for ILACS inspections. They work across regions and therefore quality assure the work of a variety of inspectors, some from within their region who they line manage and some from outside their region.
13. The findings are detailed in the sections below. As a result of the review, we have made – or are making – the following changes:
  - We will inspect the largest LAs with a team of five, rather than four, SC HMI. We are looking to inspect more of the smaller LAs with a team of three SC HMI.
  - We will review the effect of a new programme of training for all education HMI and SCRI working on ILACS inspections. We will assess if any additional inspection time is needed for SCRI and education HMI on inspections.
  - We will continue to monitor the effectiveness of, and develop the process of, an increased level of management oversight during inspection. This includes providing more support for less experienced lead inspectors and inspection teams. We have appointed a national lead for quality assurance, whose role will include this monitoring and development.
  - Line managers will continue to work with inspectors to ensure that we gain a thorough insight into children’s views during inspections, using the variety of methods detailed in the framework. We will continue to monitor how well we report on how an LA focuses on the voice and lived experience of the child.
  - We will standardise the exact format of our risk assessments. We have held regular meetings with senior inspectors nationally to improve the consistency of how we record risks and scheduling decisions.
  - We will be communicating widely to LAs over the coming months that self-evaluations should not be written specifically for Ofsted. We discussed this with representatives from the Association of Directors of Childrens Services (ADCS) in July 2019.

- We will continue to work with HMI and SHMI to further standardise focused visit letters. We have audited the information we collect at a focused visit to better standardise practice.
- We will continue to work across internal teams and with the Care Quality Commission (CQC) to improve how we coordinate and schedule local area special educational needs and disability (SEND) inspections.

## **Proportionality of ILACS framework**

14. The details below show that, in the first year of implementation, ILACS has successfully delivered our aim of being a proportionate inspection system. However, this has not been without challenges: 10 of the 16 LAs we spoke to reported feeling burdened by inspection in general.
15. In addition to ILACS inspections, elements of LA children's services also receive local area SEND inspections (jointly delivered by Ofsted and CQC) and youth offending team (YOT) inspections (delivered by Her Majesty's Inspectorate of Probation (HMI Probation)). LA staff perceive any period of time when any inspectors are on site as inspection, whether we term it a visit or an inspection. It is also a result of a lack of coordination with when non-ILACS-related inspections are scheduled. This meant that some LAs received Ofsted inspections shortly before or soon after inspections from other bodies.

## **A more proportionate inspection system**

16. Table 1 below gives a breakdown of the number of different engagements we have had with LAs in 2018. We carried out focused visits, monitoring visits, JTAIs, short inspections and standard inspections in 122 different LAs. This is compared with carrying out monitoring visits, JTAIs and SIF inspections in 71 LAs between September 2016 and August 2017.<sup>1</sup>

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<sup>1</sup> Note that, although the SIF comparison is not based on a calendar year, it represents the final full year of SIF, a period when monitoring visits were fully embedded into the framework and the three-year inspection cycle was in full operation. It therefore provides a comparative 12-month inspection cycle.

**Table 1: Engagement with LAs in 2018 and September 2016 to August 2017**

Engagement type	Number of occurrences, January – December 2018* (ILACS)	Number of occurrences, September 2016 – August 2017 (SIF)
Annual engagement meeting	151	Not formally part of SIF
Focused visit	68 (for 65 LAs)	N/A
Short inspection	8	N/A
Standard inspection	26	N/A
Monitoring visit	54 (for 21 LAs)	76 (for 28 LAs)
JTAI	9	8
Four-week SIF inspection	N/A	42
Total number of LAs engaged in year (excluding annual engagement meetings)	122	71

\* (excluding inadequate LAs until Sept 2018)

17. The ILACS proportionate inspection programme should result in fewer days of visits and inspections of those LAs that have a judgement of good or outstanding. Table 2 details the average number of days that inspection teams have spent on site in LAs with different overall effectiveness judgements. It gives the average length of time on site rather than the number of inspector days (that is, it does not reflect that four inspectors would be present for inspections and two on focused and monitoring visits). We have chosen to use length of time on site because this is what LAs regard as the length of engagement. We have used a weighted average<sup>2</sup> because the number of LAs with different judgements varies. This therefore gives an accurate average of the number of days we have spent on site delivering inspections and visits.
18. Table 2 shows that we are more likely to spend more time with an LA judged as requires improvement to be good or inadequate at its previous inspection. This is also aligned to our corporate strategy of being more focused in our inspection.

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<sup>2</sup> The weighted average takes account of the different number of LAs with each judgement. The average number of days spent with a LA with a specific judgement is multiplied by the number of LAs with that specific judgement before then calculating the average.

**Table 2: Average number of days visiting or inspecting LAs by overall effectiveness judgement<sup>3</sup>**

Overall effectiveness judgement (as under SIF)	Average number of days spent with LA (2018)*	Number of LAs visited (2018)*
Outstanding	2	2 out of 3 (67%)
Good	3.2	36 out of 54 (67%)
Requires improvement to be good	5.3	65 out of 76 (86%)
Inadequate	7	19 out of 19 (100%)
Overall weighted average	4.8	

\* This does not include re-inspections under SIF, that is, inspections before September 2018. We excluded re-inspections of inadequate LAs before September 2018 because these were still under the SIF rather than ILACS framework.

### Perceived burden of inspection

19. In interviews, DCSs said that visits and inspections are less pressured than the four-week SIF inspection. This was due to the reduced number of inspectors on site, the shorter inspection timeframe and fewer requirements to set up meetings for inspectors.
20. However, they still raised the issue of the constant anticipation of inspection. ILACS is part of a larger range of inspections, both from Ofsted and other inspectorates. DCSs acknowledge that they do not expect all the different inspectorates to plan around each other. However, they emphasised the importance of our appreciating that inspection takes time and energy to coordinate. DCSs feel that there needs to be a balance between regularity of the different inspections and being able to continue practice and implement necessary changes post-inspection.
21. Table 3 gives an overview of the timing of local area SEND inspections, between January 2018 and March 2019, in relation to ILACS visits and inspections. Our guidance to LAs suggests that local area SEND inspections will, wherever possible, avoid the three months after an ILACS visit or inspection and avoid the same school term as an ILACS visit or inspection. It shows that 11 of the 43 local area SEND inspections in the timeframe, equivalent to 26% of inspections, fell within three months of ILACS visits and inspections. Four local area SEND inspections fell within the same school term as ILACS visits and

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<sup>3</sup> We are unable to provide a SIF comparison as the framework that preceded SIF did not give an equivalent overall effectiveness judgement that covers the same judgement areas. As the SIF was not risk-based and, unless an LA was inadequate and therefore subject to monitoring visits, would only have been visited once in the three-year inspection cycle, the comparison would not provide helpful insight.

inspections. Four local area SEND inspections fell within one month of ILACS visits and inspections.

22. These numbers confirm reports by LAs of ILACS visits/inspections and local area SEND inspections falling very closely. The numbers show that, for a quarter of local area SEND inspections, we are not following our guidance on inspection scheduling. As a result of this finding, we will improve how we schedule ILACS visits/inspections and local area SEND inspections. We will ensure that this is aligned to our guidance and not overburdening LAs.

**Table 3: Timing of local area SEND inspections and ILACS visits and inspections**

<b>Timing of inspections</b>	<b>Number of local area SEND inspections Jan 18 to Mar 19</b>	<b>Percentage</b>
Local area SEND inspections more than three months after ILACS visit or inspection	32	74%
Local area SEND inspection within three months but more than one month or not in same school term as ILACS visit or inspection	3	26%
Local area SEND inspection within one month of ILACS visit or inspection	4	
Local area SEND inspection in same school term as ILACS visit or inspection	4	
<b>TOTAL</b>	<b>43</b>	<b>100%</b>

23. LAs see focused visits as an inspection. They reported to both ourselves and the University of Birmingham that, when inspectors are on site, it feels like an inspection, whether or not a judgement is being made. However, the University of Birmingham reports that LAs have a lower level of anxiety about focused visits than they do about judgement inspections. While focused visits consist of only two days on site, during this time, senior leaders and others in the LA focus on the visit more than on their everyday work.
24. DCSs also reported that they see preparation time as part of an inspection. From their perspective, standard inspections are three weeks long, short inspections are two weeks long and focused visits are one week long. They place their full attention on the inspection during that time. Senior leaders clear their diaries for inspections and visits, taking time away from other activities and improvement plans. This allows them to:
- be available to the inspection team as needed to answer questions
  - attend meetings and facilitate visits to specific teams

- be available to support staff throughout the inspection, including supporting staff in preparing for the inspection.

We should not overlook the effort put in by, and interruption caused to, LAs whenever inspectors visit.

## Efficiency

25. Through more regular but shorter contact with LAs, the ILACS framework aims to be more proportionate and, as a result, more efficient. This section shows that, based on a model of inspector days, the ILACS system is more efficient than the SIF. We are managing to visit or inspect more LAs on an annual basis using fewer inspectors.
26. Table 4 shows a breakdown of the number of LAs visited each year under the SIF and ILACS frameworks, the number of SC HMI inspector days needed to deliver the visits and inspections each year and the size of the HMI/SHMI workforce needed to deliver the visits and inspections. The numbers below have been developed through modelling, rather than being actual figures.
27. Taking a more proportionate approach, including two-day focused visits as well as inspections of differing lengths, we are able to visit or inspect around 40 more LAs each year under the ILACS framework. This engagement is delivered using around 2,000 fewer days of inspectors' time, requiring 16 fewer HMI and three fewer SHMI. This saves £2.1 million of our staff costs annually.

**Table 4: Comparison of efficiency of SIF and ILACS frameworks**

Framework	LAs engaged in a year	Inspector days per year	Workforce
<b>SIF</b>	80	6,200	56 HMI/16 SHMI
<b>ILACS</b>	120	4,300	40 HMI/13 SHMI
<b>Change with ILACS</b>	+40	-1,900	-16 HMI, -3 SHMI

28. Visiting and inspecting more LAs each year allows our regions to have more up-to-date knowledge of more LAs and their current service provision, successes and challenges. Our evaluation of the progress of LA services is more frequent, allowing us to make appropriate scheduling decisions for visits and inspections and give more timely advice to the Secretary of State.

## Inspection system rigour

29. The ILACS framework aimed to introduce a more flexible, practice-focused and risk-based approach to inspections. This included the addition of two-day focused visits and differentiated inspections (one-week and two-week) depending on the LA's overall effectiveness grade. Inspectors, our regional

teams and DCSs have welcomed the practice-based focus and the move away from a perceived-deficit model of inspection. They see that being more risk-based, flexible and responsive makes it a more mature model that allows us to understand each LA in more depth than we were able to under the SIF.

30. With every new model there are challenges. Inspectors are concerned about:
- the adequacy of the evidence they are able to collect in short inspections
  - the challenges faced by SCRIIs and education HMI in evaluating services in the time they have available on inspections.

These challenges are discussed in detail in the sub-sections below.

### **New approach to inspection**

31. The ILACS framework focus on practice rather than process during inspection allows inspectors to understand what LAs do and how they assure themselves that it is working, rather than simply checking that they are doing specific things.
32. In interviews and focus groups, HMI and SHMI said they liked this new approach. DCSs were also positive, reporting to us that social workers and frontline staff are enjoying the opportunity to engage with and showcase their work to inspectors. Similarly, in interviews completed by the University of Birmingham, managers and frontline staff in LAs reported that it was an improvement on previous inspection frameworks.
33. The different inspection types (short and standard) allow us to begin inspections with specific assumptions. The ILACS framework states that:

‘inspectors preparing for a short inspection will start with a mind-set that “this is a good local authority”’.<sup>4</sup>

Senior HMI and DCSs report that this has positively shifted the inspection model away from a deficit approach. They see that inspectors are able to follow lines of enquiry to seek a full understanding of practice, acknowledging areas of strength as well as areas where elements are missing or need further work.

34. Under the ILACS framework, inspectors can now determine specific lines of enquiry and close these down once they are satisfied they have enough evidence to evaluate them. Inspectors, SHMI and DCSs report that this gives us a better approach with which to understand and evaluate specific LAs. All parties involved, including DCSs, also report that this means that LAs are less

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<sup>4</sup> ‘Framework, evaluation criteria and inspector guidance for the inspection of local authority children’s services’, Ofsted, November 2017; [www.gov.uk/government/publications/inspecting-local-authority-childrens-services-from-2018](http://www.gov.uk/government/publications/inspecting-local-authority-childrens-services-from-2018).

able to manage the inspection process to 'show their best face'. Inspections evaluate evidence from frontline practice. As a consequence, the ILACS framework is seen as a more rigorous and valid process.

### **Rigour of evidence collection on inspection**

35. SC HMI report that they have enough time on focused visits and standard inspections to evaluate the service(s) under investigation.
36. DCSs also reported satisfaction, to us and the University of Birmingham, in the breadth and depth of services explored in a two-day focused visit. They said that while a lot was packed into two days on site, the level of investigation was realistic, proportionate and thorough. DCSs reported that focus visits provided an opportunity for staff to showcase their work and current level of progress and achievement. This has helped LAs to confidently move forward to the next stage of action plans. Overall, DCSs report that focused visits are a healthy and useful process in the inspection system.
37. Our SC HMI also report that they can collect enough evidence on standard inspections to confidently evaluate children's services. DCSs were satisfied with the extent of the services covered in the two-week inspection, reporting that the inspection teams are able to triangulate data in this time. They report that standard inspections were thorough and detailed, even when inspectors worked across large geographical areas.
38. However, DCSs noted that some social workers are left disappointed when they have not been spoken to by inspectors. This is something that DCSs acknowledge they need to manage, so staff are prepared but not left disappointed. One DCS reported that some managers found it challenging that the ILACS framework allows for their area of service to be evaluated without speaking to them as the manager. This is an explicit change introduced by ILACS. The framework states that 'inspections will focus on social workers' direct practice with families by:

'Scrutinising and discussing the sample of children's cases that reflect the scope of the inspection alongside discussions with practitioners working with the child or young person – this will include social workers and may also include other practitioners and providers.'<sup>5</sup>

As a priority, inspectors speak to social workers involved in the sample cases and only when needed to others, including managers. There was a much higher number of planned meetings with managers in SIF inspections. Again, DCSs and social workers were happy with this different approach but commented

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<sup>5</sup> 'Framework, evaluation criteria and inspector guidance for the inspection of local authority children's services', Ofsted, November 2017; [www.gov.uk/government/publications/inspecting-local-authority-childrens-services-from-2018](http://www.gov.uk/government/publications/inspecting-local-authority-childrens-services-from-2018).

that it felt unfamiliar. They also said that while standard inspections (like any inspections) are tiring for LAs, they were more manageable than the four-week long SIF inspections.

39. The introduction of short inspections is a significant change to our model of inspecting of children’s services. Only eight were delivered in the first year of ILACs. However, by the end of March 2019, when we completed our survey with HMI, two thirds of SC HMI had worked on a short inspection. The University of Birmingham reports that inspectors find short inspections more intense and more stressful than focused visits and standard inspections. Our survey findings align with this. A large majority of inspectors working on short inspections report that they found the shorter timeframe challenging. It is essential we ensure that inspectors are not trying to gather the same amount of evidence on a short inspection as they would on a standard. The inspections are different. Short inspections begin with the assumption that the LA is good and focus on answering the following three questions:

- ‘Has the quality and impact of practice been maintained?’
- Are there any areas where the quality and impact of practice have improved?
- Are there any areas where the quality and impact of practice have deteriorated?’<sup>6</sup>

Given that our inspectors are introducing a significantly different approach of inspection through the short model and it takes time to embed any new approach, it is not surprising to us that they are felt to be challenging. We would expect this to ease over time.

40. Only three of the 16 DCSs interviewed had experienced short inspections and each held different opinions about their quality. These three reported that short inspections were intense and challenging. One DCS said that the inspection team managed to see everything in their LA. Another said that not as much can be seen in a short inspection than a standard inspection, which is what we would expect. Both of these DCSs felt that short inspections may not be proportionate when applied to LAs of different sizes. The final DCS said that the period of time allowed for short inspections meant that it was hard to engage with the inspection team, that staff did not feel they saw inspectors enough and that leaders felt less able to explain their way of working. While they were content with the judgement received, the process was challenging. Our findings in this report demonstrate good reliability of short inspection judgements but also show some differences in inspector practice.

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<sup>6</sup> ‘Framework, evaluation criteria and inspector guidance for the inspection of local authority children’s services’, Ofsted, November 2017; [www.gov.uk/government/publications/inspecting-local-authority-childrens-services-from-2018](http://www.gov.uk/government/publications/inspecting-local-authority-childrens-services-from-2018).

41. Representatives from two large LAs that had experienced short inspections said that the inspections were intense but that the process was good. They felt that inspectors managed a thorough investigation of services. Through interviews and the inspector survey, HMI and SHMI felt there could be challenges collecting enough evidence in large LAs to confidently evaluate children's services during short inspections. They have also expressed concern at the proportion of LA cases that would be viewed by inspection teams of the same size in large and small LAs. This raises the question of whether we are over-evaluating small LAs or not seeing enough of large LAs, or both. As a result of these findings, we are introducing routinely larger inspection teams for large LAs and greater management oversight and support during inspection.
42. Since the introduction of ILACS framework, short inspections have resulted in overall effectiveness judgements of requires improvement to be good, good and outstanding. These have been both upgrades and downgrades of previous inspection judgements. Our analysis of the [reliability of short inspection judgements](#) shows that our judgements are sufficiently reliable across all of these judgement changes. Inspectors reported to the University of Birmingham that short inspections were most stressful when it appeared that the LA had declined from good. Some HMI and SHMI report that gathering adequate evidence in short inspections for those LAs on the cusp between two judgement grades can be challenging. This is the cusp between good and outstanding and good and requires improvement to be good. Given the small number of short inspections delivered in 2018 and the significant change between a four-week SIF inspection and a one-week ILACS inspection, some anxiety would be expected. Some of this anxiety may be alleviated as our inspectors become more confident with the whole inspection system; this includes the regional risk-assessment processes and the greater intelligence gained about LAs between judgement inspections through focused visits. However, it is important that our inspector teams have the confidence that if they have concerns about gathering enough evidence while they are on site, they can, in exceptional circumstances, seek further resource.

### **SCRI and education HMI roles**

43. SCRI and education HMI have reported finding it challenging to prepare for ILACS inspections in the time allocated. Regions manage inspector schedules. In focus group discussions, it was clear that there was regional variation, outside of the agreed tariff, in the amount of time allocated for inspectors to prepare for ILACS. Given that these inspectors work infrequently on ILACS inspections, they reported a lack of confidence in knowing the scope expected of them in ILACS inspections. In an internal survey carried out in April 2019, a majority of SCRI and education HMI said they would like more time before inspection to re-familiarise themselves with the framework.
44. All of the SCRI respondents were confident that they had the appropriate knowledge to make accurate evaluations of fostering services. A majority are

confident that they had the appropriate knowledge to make accurate evaluations of adoption services. This is likely because most of the SCRIIs surveyed inspect independent fostering agencies, with a smaller number inspecting voluntary adoption agencies or adoption support agencies.

45. A majority of education HMI respondents were confident they had appropriate knowledge to make accurate evaluations of the services they investigate during ILACS inspections. Some, however, reported a lack of thorough understanding of thresholds in areas such as appropriate caseloads, personal education plan (PEP) completion rates, elective home education and children missing education. We have developed a training programme to support SCRII and education HMI. SCRII and education HMI focus groups could promote the sharing of knowledge and good practice to support inspectors' confidence in these areas.
46. Most of the SCRII surveyed stated they would like more time for evaluating documents and data provided by the LA, speaking to key individuals and recording their evidence on inspection. In focus groups, they reported that additional time could help them uncover issues more thoroughly. DCSs also reported in interviews that they did not always have the opportunity to follow up with SCRII when queries or concerns were raised and that the lead inspector did not always have the necessary information and knowledge to adequately answer their queries or close down concerns. Giving SCRII and education inspectors additional time, particularly to record more detailed statements of their evidence, could alleviate these concerns.
47. In contrast, the majority of education HMI surveyed said they have sufficient time to organise meetings with key individuals but fewer said they had sufficient time to speak to those individuals. Again, most of the education HMI surveyed stated they would like more time on inspection. They shared in focus groups that key individuals spoken to as part of the inspection did not always have the necessary information at their disposal at the time. They also reported that due to the limited number of conversations they have time for with schools, children and young people, they are not always able to fully triangulate the evidence. In contrast to the survey result from SCRIIs, a greater proportion of education HMI report they have sufficient time to record evaluative statements of their evidence, though it was reported in focus groups that this can again be dependent on the schedule of other inspections as determined by regional teams. As with SCRIIs, DCSs report they do not have the opportunity to discuss and follow up with education HMI when queries or concerns were raised and similarly the lead inspector was not always able to provide the detail in response.
48. Both SC HMI and DCSs have welcomed the addition of SCRIIs and education HMI to ILACS inspections. They see that this brings specialist expertise to these service areas, which enables us to make more reliable evaluations. Given that both SCRIIs and education HMI report there being room for improvement to

thoroughly evaluate services during ILACS inspections, we are not fully capitalising on their expertise. Once the new training programme for SCRI and education HMI has been fully implemented, we will review whether this has improved how time is used on inspection. We will then look to increase the allocated time as necessary.

## Reliability of inspection judgements

49. The ILACS framework introduced a new set of evaluation criteria, strongly based on the SIF, for LAs. Coupled with this is the change in inspection length from four-week inspections to two-week standard inspections and one-week short inspections.
50. It is imperative, given these changes, that our inspectors are making sufficiently reliable judgements so that LAs are judged similarly regardless of who is inspecting them. The sections below show how we are confident that during the first year of implementing the ILACS framework, the judgements made on standard and short inspections have been sufficiently reliable.

## Standard inspections

51. To review the reliability of standard inspection judgements, we gave one of three evidence bases to two sets of two inspectors. We asked each set of inspectors to work together, over two days, to review the evidence in the electronic evidence base and to reach an overall judgement, as well as to give the three judgements that lead to the overall judgement. We compared the reviewers' judgements to the published judgement. We also asked reviewers to identify areas for improvement and whether they would have chosen the same lines of enquiry as the original inspection team. This methodology is very similar to that used in a recent review of the reliability of CQC's inspection assessments.<sup>7</sup>
52. Table 5 gives an overview of the reliability review of standard inspection judgements. It details the level of agreement between the judgement given by the two sets of reviewers and the inspection judgements given. Of the 28 judgements, 25 matched the published judgements. From this, we conclude that we have sufficiently consistent and reliable judgements for standard inspections.

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<sup>7</sup> Boyd, A., Addicott, R., Robertson, R., Ross, S., & Walshe, K. (2017), 'Are inspectors' assessments reliable? Ratings of NHS acute hospital trust services in England', *Journal of health services research & policy*, 22(1), 28–36. doi:10.1177/1355819616669736.

**Table 5: Outcomes of evidence base reviews of standard inspections**

<b>Evidence base</b>	<b>Overall judgement</b>	<b>Help and protection</b>	<b>Children in care and care leavers</b>	<b>Impact of leaders</b>
Evidence base A Inspection judgement: remained as requires improvement (RI)	2 x agreement with published judgement	2 x agreement with published judgement	1 x agreement with published judgement 1 x one grade lower than on-site judgement	2 x agreement with published judgement
Evidence base B Inspection judgement: moved from RI to good	1 x agreement with published judgement 1 x one grade lower than published judgement	2 x agreement with published judgement	2 x agreement with published judgement	1 x agreement with published judgement 1 x one grade lower than published judgement
Evidence base C Inspection judgement: moved from RI to good	3 x agreement with published judgement	3 x agreement with published judgement	3 x agreement with published judgement	3 x agreement with published judgement

53. As well as reviewing judgements, we asked teams reviewing evidence bases to identify specific areas for improvement for each LA. The alignment was good between the original areas for improvement and those identified for evidence base A (where the LA remained RI) and evidence base B (an LA that moved from RI to good). There was much less alignment for evidence base C (an LA that moved from RI to good). Reviewers did not identify all original areas for improvement, alongside identifying additional areas not stated by the original inspection team. Given the alignment in judgements for that specific inspection, this is not a significant cause for concern.
54. All review teams had difficulties reaching the judgement for impact of leaders. This was due to evidence being embedded across the evidence base rather than being organised under a specific leadership heading. Reviewers identified documenting evidence under headings as good practice. They said it should be more widely applied across all inspection evidence bases.

### Short inspections

55. We used the same method to review the reliability of short inspection judgements. We gave one of three evidence bases to two sets of two inspectors. We asked each set of inspectors to work together, over two days, to review the evidence in the electronic evidence base and to reach an overall judgement, as well as to give three judgements that led to the overall judgement. We compared the reviewers' judgements with the published

judgement. We also asked reviewers to identify areas for improvement and whether they would have chosen the same lines of enquiry as the original inspection team.

**Table 6: Outcomes of evidence base reviews of short inspections**

<b>Evidence base</b>	<b>Overall judgement</b>	<b>Help and protection</b>	<b>Children in care and care leavers</b>	<b>Impact of leaders</b>
Evidence base D Inspection judgement: moved from good to outstanding	2 x one grade lower than published judgement	2 x one grade lower than published judgement	2 x agreement with published judgement	2 x one grade lower than published judgement
Evidence base E Inspection judgement: remained good	2 x agreement with published judgement	2 x agreement with published judgement	2 x one grade lower than published judgement	2 x agreement with published judgement
Evidence base F Inspection judgement: moved from good to RI	2 x agreement with published judgement	2 x agreement with published judgement	2 x agreement with published judgement	1 x agreement with published judgement 1 x one grade lower than published judgement

56. Table 6 shows the level of agreement between the judgement given by the two sets of reviewers and the published judgements. Between the off-site reviewers, 23 of the 24 judgements aligned. Fifteen of these matched the published judgements.
57. As with the standard inspection reviews above, we asked teams reviewing the short evidence bases to identify specific areas for improvement for each LA. There was good alignment between the areas of improvement identified by reviewers and the original areas for improvement for evidence base F, which moved from good to RI. There was much less alignment between the reviewers and the original areas for improvement for the other two evidence bases, although generally good alignment between the areas of improvement identified by each team of reviewers. This shows sufficient consistency when reviewing the same electronic evidence base.
58. In all cases, reviewers suggested the evidence base they were reviewing did not appear to be comprehensive. From the evidence viewed, reviewers could see that certain questions and challenges had been answered and addressed, but the detail of the answers given by the LA was not thoroughly recorded. Therefore, the reviewers could not use this information to influence the judgements reached. From the evidence available, we are confident that all issues raised were resolved through discussion.

59. With good alignment of published and reviewers' judgements across two of the reviewed evidence bases and alignment between the reviewers' judgements for the third evidence base, we conclude that short inspection judgements are sufficiently consistent and reliable.
60. Where variation with the published judgement or a lack of alignment in areas for improvement exist, we suggest that this may be due to limitations in the evidence recorded in the electronic evidence base, although we cannot be sure this is the reason. Therefore, we cannot draw strong conclusions around why, for one evidence base, there is a lack of alignment between reviewer and published judgements. Regardless of whether judgement grades are increasing, remaining the same or declining, the thoroughness of evidence recording is imperative.
61. We have identified that the quality and thoroughness of evidence recording may need improvement in short inspections. We will not be taking a specific action around this because the new electronic evidence gathering (EEG) tool is being implemented across all inspections in September 2019. This will change the way inspectors record their evidence. However, it is essential that evidence bases are always of a good quality and QAMs should ensure this. We will provide greater management oversight during inspections to support inspection teams and ensure the quality of evidence bases.

## **Risk assessment processes**

62. The ILACS framework relies on Ofsted's eight regional teams generating risk assessments of LAs and scheduling focused visits and inspections accordingly. Various elements feed into the risk assessment, including LAs' self-evaluations of social work practice, annual engagement meetings, national statistics, inspection outcomes and other local intelligence. The risk assessment process and thresholds applied are similar across all regions. Recording of risk levels needs to be consistent across regions and recorded so that regional and national teams can view it as needed.
63. The sections below show the successes and challenges of the different elements of the risk-assessment process. We highlight the need for greater uniformity in how regions record risk assessments and greater national oversight of the risk assessment and scheduling decisions. This is to ensure that we assess risks and apply thresholds consistently.

## **LA self-evaluation of social work practice**

64. The quality of LA self-evaluation of social work practice is variable. DCSs in regions with strong peer-review systems report the value of producing self-evaluations. Regional teams in these areas also note the quality of self-evaluations in comparison to other regions. However, this perceived quality does not necessarily lead to greater or more honest reporting that would help us identify risks earlier. These documents are useful in helping identify how well

LA leaders and managers understand the LA's practice and progress and for setting agendas for annual engagement meetings. However, they do not form a major part of regional risk assessments.

65. Regional teams report receiving some long and/or unfocused self-evaluations of social work practice. DCSs want greater clarity on what Ofsted wants from LA self-evaluation. Interviews with DCSs showed that regions differed in what they asked LAs to cover in terms of content and timeframe when they have had a focused visit or inspection since producing their last self-evaluation. The ILACS framework makes clear that self-evaluations are optional but if an LA does want to do one, there are three questions that we would like answered in it. Our regional teams should also re-iterate to LAs that we are not looking for them to create a document just for us. We want them to send us a recent self-evaluation that they have produced as part of their on-going monitoring and evaluation work. The style, content and structure are up to them.

### **Annual engagement meetings**

66. Annual engagement meetings are providing a good platform for regional teams to develop their intelligence and risk profiles of LAs. The meetings are reported to be being used productively to:
- explore lines of enquiry and areas of concern
  - challenge LAs' knowledge of the quality and direction of their services
  - continue to build relationships with DCS and their teams.

### **Risk assessment process and recording**

67. To assess the risk profile of LAs, all regional teams use similar intelligence, such as:
- previous inspection reports
  - insights from regulatory inspections
  - national statistics around children in need
  - whistle-blowing
  - patterns of notifications (such as serious incident notifications)
  - contact from DCSs
  - self-evaluations.
68. SHMI are confident using this intelligence to generate risk profiles. Generating risk profiles requires a great deal of professional judgement. SHMI must draw together the insights from the intelligence mentioned above along with softer evidence that they hold about various LAs and individuals.

69. Ofsted's data and insight (D&I) inspection insight team provides analytical support to inspectors and regional teams. Colleagues in this team report that they do not get consistent requests from regional teams to provide data analysis for annual engagement meetings and risk-assessment processes. They suggest that Ofsted could be making better use of the data available in determining risk.
70. This review was unable to independently 'test' the reliability of the calculated risk profiles. Through exploring individual cases, it is clear that thresholds are similar across all regions. However, we may be able to do further analysis to strengthen the risk-assessment process.
71. Despite thresholds being similar, there are significant differences in how regional teams record the profiles:
- Some regions have a very structured recording system, with RAG ratings of the main risks that lead to an overall risk profile.
  - Other regions do not have the same system of recording their RAG rating but the current risks leading to the risk profile are clearly recorded.
  - Some regions do not have a systemic process of recording at all. SHMI can provide a justification of risk when asked, which means that it would not affect inspection activity. However, because the risk level and justification were not centrally recorded, they could not be easily accessed if the SHMI were absent.

We are therefore implementing a standard risk recording system across all regions. Good practice can be learned from the regions already systematically recording their risk profiles.

72. The ILACS framework states that we may carry out a standard inspection instead of a short if intelligence suggests a significant deterioration in performance. After the first year of ILACS, some SHMI reported being unclear on the threshold for changing a good or outstanding LA inspection from a short to a standard one. During interviews held in February 2019, SHMI told us that they understood the threshold was high. However, they were not clear on the level of deterioration they needed to see to consider carrying out a standard rather than short inspection. At that point, we had not changed any inspections from a short to a standard. We have since changed one. In another short inspection, inspectors found a significant deterioration but said that they could not have determined this before arriving on site. This recent evidence suggests there is an improved understanding of the threshold for choosing to deliver a standard over a short inspection.

## Scheduling decisions

73. The first year of ILACS saw the roll-out of focused visits, including examples of national and regional teams 'holding their nerve' to deliver a focused visit before a judgement inspection.
74. The framework sets out that we intend to support LAs to develop and progress when the level of a risk is below a specific threshold or the approach being taken to tackle a risk shows logical processes and strong leadership. Visit and inspection scheduling decisions show that we are applying the framework as intended. In some cases, regions have chosen to schedule a judgement inspection before any focused visits due to the length of time since the LA's last judgement inspection. In the future, we expect to schedule focused visits and inspections based on risk profiles instead.
75. We have recently clarified in the framework that good and outstanding LAs should only receive one focused visit between judgement inspections. This is so that these visits do not become a form of monitoring. We found that some regions have already done this visit in the first year of implementing ILACS. This is very early given that LAs should only have one judgement inspection every three years (unless we have serious concerns).
76. Table 7 shows the theme of focused visits in the first year of ILACS. Over 40% were focused on the LA's 'front door' (the initial point of contact in the LA for anyone concerned about a child). Focusing on the front door allows regions to get a good overview of the quality of a range of services. This makes it a useful theme when visiting LAs that we have not inspected recently or that we had no specific concerns about in their last inspection. We are therefore likely to choose it for visiting LAs in these cases. Table 7 also shows the proportion of focused visits by judgement area. This split of focuses is not surprising, given the larger proportion of children and young people in an LA's child protection service compared with in the children in care service.

**Table 7: Theme of focused visits in 2018**

Theme of focused visit	Number (percentage) of focused visits in 2018	Percentage by ILACS judgement area
<b>Help and protection judgement area</b>		
Front door	29 (43%)	77%
Children in need / subject to a plan	18 (27%)	
Vulnerable adolescents	5 (7%)	
<b>Children in care and care leavers judgement area</b>		
Care leavers	9 (13%)	23%
Achieving permanence	5 (7%)	
Children in care	2 (3%)	

77. In future years, we expect to see less focus on the front door as we gain more regular intelligence about LAs through the ILACS framework. We also expect to see a greater focus on areas identified as areas of concern or strength during inspections. Maintaining an oversight of the focuses chosen will help to show whether focused visits are supporting a proportionate and focused approach.
78. SHMI expressed concern at JTAIs taking the place of focused visits in certain instances. While regions put forward LAs for JTAI inspection, due to selection criteria and the need to take into consideration restrictions from all the inspectorates involved, there are a limited number of LAs available for selection. This means we have limited flexibility to omit any options.
79. SHMI suggest that because JTAIs have a specific theme, they do not allow for a full intelligence-gathering opportunity. Also, when the LA is good or outstanding, the JTAI takes the place of the one focused visit available between judgement inspections. However, this is likely to only be problematic if the theme of the focused visit is something other than the front door, which does give an in-depth coverage. We aim to deliver a proportionate and risk-based approach that supports LA improvement. Therefore, in exceptional cases where pressing intelligence determines the need for a focused visit on a particular theme, it would help if an LA was exempt from JTAI selection so that we can deliver that focused visit.

## **The on-site inspection process**

80. The ILACS framework is significantly different to the SIF framework in that there is much more fluidity in the inspection process. Rather than following a timetable of pre-defined meetings and activities, inspectors identify lines of enquiry for each inspection and use appropriate methods to gather and evaluate evidence. This allows for flexibility in practice and approach to suit

different focuses in different ILACS inspections, although we expect a certain level of uniformity.

81. Inspectors are expected to work together as a team in each area of service to gather and analyse evidence. We introduced this approach to strengthen analysis and shorten the length of time needed in each area of service. This was because we presumed that groups of inspectors can validate evidence and analysis more quickly than individuals. From the reliability test and other elements of this review, we have confidence in the evidence being collected.
82. This section looks at how consistent inspectors' practice is when on site. We gained insights for this both from our inspector survey and from the shadow inspections completed by the University of Birmingham. There are some differences in the way inspections are led and in case sampling. Sometimes, we are not using our authority as an inspectorate to discuss the specific cases we want to see. The University of Birmingham found that some inspectors worked only with social workers present in the office and this could limit the cases available to them. Our inspectors should not rely on cases that are available at the time and can be more demanding in their requests of LAs.

### **ILACS inspection process and application of methods**

83. Our survey with inspectors allows us to understand whether they are confident that they are adhering to the ILACS framework during inspections. The proportions of inspectors who are confident or neutral in their confidence that they are inspecting as intended by the framework are:
  - SC HMI – 95%
  - SCRIs – 84%
  - education HMI – 77%.

Therefore, we would expect only some minor variation in how education HMI and SCRIs approach and deliver their element of ILACS inspections.

84. The ILACS framework details several methods for gathering evidence. We asked inspectors to rank the importance they think the ILACS framework placed on specific methods. Alongside this, we asked them to rank the time they spent gathering evidence using that method while on inspection. Comparing the rankings gives us an indication of how strongly inspectors are adhering to the evidence-gathering methodology. Inspectors ranked many of the methods similarly, meaning that they were prioritising the methods of evidence collection in the same order as in the framework. Importantly, they ranked the following as first and second in terms of their importance within the ILACS framework and time spent on them:
  - meeting with social workers to review case files and case work
  - reading and interpreting data.

The University of Birmingham observed this ranking and estimated that six of the nine and a half to 10 hours on site is spent talking directly with LA staff, primarily social workers. This shows adherence to the ILACS framework.

85. Inspectors rank observing social workers in practice with service users as middle of the table in terms of importance within the ILACS framework but spend the least time on it. Inspection shadows completed by the University of Birmingham also identified that this was not a routine method used on inspections. The framework does not expect our inspectors to routinely observe social work practice. However, we do expect inspectors to understand how the LA is assuring itself of consistent and good-quality service delivery by observing practice. Inspectors are not currently exploring LAs' implementation of practice observation. This should be addressed to ensure adherence to the framework.

### **Case sampling**

86. A small majority of SC HMI report that the methodology used for case sampling differed across inspection teams. This was also identified in on-site inspection shadows. While we expect to see different types of cases chosen, based on specific lines of enquiry on different inspections, we would expect to see greater uniformity in how inspection teams are selecting cases and the proportion of cases selected in different ways. For example, we should see some selected beforehand by the inspection team, some chosen based on certain criteria when sat with social workers and some chosen by social workers themselves while inspectors are sat with them.
87. There are differences in how we use these methods to select the cases. The University of Birmingham noted that when the social worker working on a specific case is not present in the office, we use remote sampling rather than using our authority to request to talk through a case with a manager. The university also highlighted that how we collect and analyse information is rarely subject to any quality assurance processes before being presented as part of the evidence base. In the future, we will ensure that QAMs spend the recommended time on site to overcome the current differences in case sampling. We also support the University of Birmingham's recommendation that our inspectors should exercise the authority we have as an inspectorate to view and discuss specific cases, even if the social worker managing that case is not present in the office.
88. A very small proportion of SCRIIs and education HMI report that they have sufficient time to develop a suitable sample of cases that they will review during the inspection. This suggests that there are likely to be differences in approaches to case selection due to the limited time available. Both sets of inspectors report that, due to the time they have allocated to work on ILACS inspections, they lack the opportunity to work with the SC HMI in developing the sample of cases. The case selection would benefit from a more joined up approach so that, when needed, cases can be allocated between inspection

teams to track them from different perspectives. This seems to be happening rarely.

### **Role of lead inspectors**

89. A majority of the lead inspectors surveyed reported concerns about the high expectations and feasibility of the role. The lead inspector role in any inspection is a challenging one. As inspectors are learning the process of inspecting under ILACS and leading their first inspections we would expect, as reported in our inspector survey, that the responsibility and expectations of this role are regarded as challenging. Given that the majority of inspectors feel that lead inspectors can delegate certain responsibilities, it would be expected that with more experience across inspection teams, the lead role will be regarded as challenging but more achievable. We will reiterate to all inspectors the specific expectations of lead and team inspectors so that they all fully understand them and delegate tasks as appropriate. Through management oversight during inspections, QAMs can support lead inspectors and enable them to delegate tasks.
90. The flexible nature of ILACS inspections and the individuality of lead inspectors means that inspectors report some differences in how inspections are led. Our reliability review, detailed above, shows that while there may be differences in practice, they lead to the same outcome. Therefore, we are not concerned about differences in the way inspections are led.
91. However, the shadow inspections completed by the University of Birmingham provide some insights into these differences. For example:
- some lead inspectors facilitated group discussions to evaluate specific areas of service and, by the end of the inspection, to reach judgements as a group
  - some took a more dominant role, completing their own analysis of team inspectors' evidence and seeking ratification of their judgements.

The latter is not in the spirit of the ILACS framework, which states that:

'all inspectors work collaboratively on all aspects of the scope to ensure that evidence is analysed as a group activity'.<sup>8</sup>

Even though judgements are sufficiently reliable, uniformity in evidence evaluation is important to ensure that decisions are based on group discussion, rather than on one individual's analysis and judgement.

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<sup>8</sup> 'Framework, evaluation criteria and inspector guidance for the inspection of local authority children's services', Ofsted, November 2017; [www.gov.uk/government/publications/inspecting-local-authority-childrens-services-from-2018](http://www.gov.uk/government/publications/inspecting-local-authority-childrens-services-from-2018).

92. A majority of education HMI said that lead inspectors understood the scope of their role. SCRIs neither agreed nor disagreed with this statement. This suggests that there is likely to be some variability in what lead inspectors ask education HMI to do during inspections and definite variability in what they ask SCRIs to do. We have little information to expand further on this but SCRIs reported that some lead inspectors ask them to cover anything related to adoption and fostering included in the inspection. Some of this should not come under their role and should be covered by the SC HMIs. A lack of understanding of the scope has led to them being given more to complete in the inspection than the framework defines. We discussed the challenges of these roles in the [inspection system rigour](#) section. We have developed a new training programme to support these inspectors and will implement greater management oversight to quality assurance processes to limit differences in inspection practice.
93. In selecting and preparing evidence bases for this review’s reliability task, we gained access to a number of inspection evidence bases. Through this, we could see that there were differences in how evidence was collated and organised. This included evidence recording by individual, by day and by theme. During the debrief sessions with inspectors who completed the reliability study, it became clear that the different styles of recording were largely down to different lead inspectors’ practice. Evidence to be used in the judgement of the impact of leaders on social work practice with children and families was, in many of the evidence bases, embedded within other evidence and therefore difficult to quickly identify. Reviewers noted the good practice they observed when inspectors had recorded this under a heading, which was expected to be a drive by the lead inspector to identify and therefore evaluate this area more easily. There is no definitive guidance on how evidence bases should be structured. The differentiated nature of ILACS inspections means that a strict structure is not likely to be appropriate. However, some uniformity to structure for ease of recording and evaluation would be beneficial. Due to the variety of teams that inspectors work with, along with activities such as the reliability study in this review, they will work with evidence bases that have a variety of structures. Over time, this would hopefully lead to an evolution of structure, giving less variation in evidence base recording. Along with this, more focused quality assurance can provide greater oversight of evidence bases during inspection, ensuring greater quality and uniformity of recording.
94. D&I’s inspection insight team report that lead inspectors are consistent in the analysis and support they request before the start of inspections and are consistent in how they interpret and use the analysis provided throughout the inspection process. However, the team reports variation in the analysis and support that lead inspectors request during inspections. Due to different lines of enquiry, we would expect different areas of analysis to be requested. Analysts suggested ongoing discussions between them and lead inspectors throughout the inspection process (including before arriving on site) to identify areas for analysis and lines of enquiry as being good practice that they would appreciate

being more regular. To enable this and the analysis it could lead to, analysts would like their tariff split in a way that gives them more time to support teams once on site and less time to generate pre-inspection analysis. Formalising a change in the proportion of tariff spent of different analysis would allow for better uniformity in the support that lead inspectors feel able to request and analysts feel able to accommodate.

## **Hearing the voices of children and young people**

95. Inspectors should be exploring the views of children through case files and talking to social workers and other frontline staff. They should be looking to understand how children's voices influence the help, care and support they receive. While inspectors do not necessarily need to talk to children to gain an understanding of how their voices are heard, they do need to be able to hear children's voices through the ILACS methods.
96. The University of Birmingham noted that inspectors did look for the voice of children, drawing out some valuable insights from case recording and talking to social workers. However, inspectors do not always hear the voices of children and young people and are not fully implementing the variety of methods they could use to hear them. The University of Birmingham identified that the voice of children in care and care leavers was heard more regularly than children in need of help and protection. Through our survey, a large majority of inspectors reported that the methods used under ILACS are effective at focusing on the child and their experiences. This is very positive because the focus on children and their experience, through examining case files, is a marked shift from the SIF to the ILACS model. In contrast, around half of inspectors said that they are able to gain a detailed picture of how children's voices influence the help, care and support they receive. This does not mean that inspectors do not in fact have a good understanding of children's voices on inspection. It could instead mean that the variety of inspection methods we have at our disposal, such as case sampling, give us enough evidence on children's voices but are not explicitly thought of in this way. Greater management oversight should ensure that we gain a thorough insight into children's views during inspections. This will include both confirming with inspectors in the instances where they are already doing this well and working with inspectors to make greater use of the variety of methods detailed in the framework as necessary.
97. DCSs report that we generally have the right balance and are speaking to the right number of children during inspections. DCSs said that the move from generically talking to a group of children, pre-selected by the LA, to taking a more selective approach to the need to talk directly to children and young people is a sensible one. They feel that we are capturing the voices of children and young people and are content with the move away from generic focus groups. Only one DCS, after experiencing a focused visit on the theme of children in care, felt that for this theme inspectors should speak directly with children who are in care. This may depend on our specific lines of enquiry for

focused visits and inspections, but the methods under ILACS support our inspectors to speak to children and young people when they feel necessary. We should be placing a focus on understanding what is feasible in the time we have during a visit or inspection, using the most appropriate methods to capture the voices of children and young people and communicating the plan to the LA where their assistance is needed to facilitate specific discussions.

## **Consistency of inspection reports and focused visit letters**

98. The ILACS framework introduced guidance aimed at shortening inspection reports so that they were more focused and succinct. The framework sets out the areas of content that must be included but also states that inspectors do not need to detail all inspection findings in the report. Our review of reports found that they followed the guidance in the ILACS framework, providing a clear summary of inspection findings.
99. The framework also introduced focused visit letters. These letters generally followed the guidance in the framework and provided the right level of detail of visit findings. However, a third of letters did not provide the right level of clarity of the level of improvement required in a service for it to be good. Inspectors need support to improve this detail, ensuring that only areas that are not yet good or risk declining to a level less than good are detailed as areas that need to improve. Following this guidance will help LAs know the areas of service that they need to focus on most closely to ensure that they remain or become good.

## **Inspection reports**

100. We reviewed 10 inspection reports published in 2018. The sections included in the reports adhered to those set out in the inspection framework. Language used in reports was clear, straightforward and free of jargon. This is in line with the requirements set out in the framework. However, some DCSs interviewed felt reports lacked nuance. One DCS suggested that the wording of reports made it look like inspectors were using a judgement-specific 'phrasebook'. There needs to be a balance between clear and straightforward language and LAs seeing their report as a unique and personalised document.
101. All but one of the reports gave a clear summary of experiences and progress of children and the impact of services on children and young people. In all but one report, inspectors included the views of children and young people they had spoken with or reflected the views of those they had seen in case sampling. Our reviewers said that reports achieved the balance between providing a suitable level of detail of areas of strength and areas needing improvement to be of value to the LA while also being accessible to a wider audience.
102. All the reports set out clearly the areas most in need of improvement.
103. We interviewed 16 DCSs and asked for their opinions about inspection reports and how useful they were for LAs. In general, they were very positive about the

reports received. They have welcomed the shorter, more succinct and focused reports (compared with SIF reports). They said that the reports reflected the feedback inspectors gave during inspection. However, they noted that there is only a limited amount of detail that can be included in shorter reports so, while reports reflected the information shared during inspection, they did not contain the same level of detail as discussions during inspection. Given that a large proportion of inspection time is spent talking to frontline staff, DCSs reported that due to the aggregation of inspection evidence, staff do not see themselves in the new style reports. However, this was not something that DCSs felt needed to be changed. They were acknowledging that they should be using the reports to facilitate conversation with their workforce about inspection findings and individuals' contribution to the findings.

104. DCSs said that they find the children and young people's report that we provide post-inspection useful. Staff use them to update and engage children and young people about the inspection outcomes, rather than being a document that is simply circulated to children and young people.

### **Focused visit letters**

105. We reviewed 29 focused visit letters published in 2018. The sections in the letters adhered to those set out in the framework. As with inspection reports, language used in these letters follows the framework requirement to be clear, straightforward and free of jargon. Our reviewers reported that the majority of letters (25 of the 29) achieved the balance between providing a suitable level of detail of areas of strength and areas needing improvement to be of value to the LA while also being accessible to a wider audience.
106. Most gave a clear summary of experiences and progress of children and young people and the impact of services on them. However, although the letters should include the views of children and young people, they did not. Inspectors speak directly to very few, if any, children and young people on focused visits, but they should explore their views when reviewing individual cases.
107. Focused visit letters detail the findings of the visit, the main strengths and areas that need to improve. In a quarter of the reviewed letters, the elements identified as most in need of improvement were not proportionate with the findings. In these letters, the findings should not have warranted a specific element being detailed as an area most in need of improvement and/or they should have led to an element being identified as most in need of improvement but it was not.

108. The ILACS framework states that the letter:

‘must help the local authority fully understand the areas of the service where improvement is needed most to ensure that children receive or continue to receive a good or better service.’<sup>9</sup>

The preceding statement clearly states that areas listed as most in need of improvement must have been identified as either not being good or at risk of not being good. A third of the letters reviewed did not make clear the extent to which the issues identified as most in need of improvement were less than good or at risk of being less than good. This information would help DCSs to prioritise actions following a focused visit. This issue was highlighted by one DCS we interviewed. They expressed their surprise at the low judgement received in an ILACS inspection given that the preceding focused visit letter did not highlight the extent to which the issues identified were less than good.

109. A small number of letters recommended ways in which the LA should remedy issues (for at least some of the identified issues). This goes against the ILACS inspector guidance.
110. DCSs agreed that focused visit letters are an accurate and useful reflection of the feedback provided on site. The structure of focused visit letters has been well-received, especially positive statements generally being listed before areas to improve. DCSs commented that, although letters are succinct and not too lengthy, the conversation with inspectors at the end of visits is extremely important. They said that the insights and feedback gained from those conversations are far more detailed than the published letter and that, therefore, the LA should take insights and actions from that meeting rather than relying on the letter to convey all of that information.
111. DCSs reported being able to comment on the letter before publication. Some had felt able to comment on tone, as well as factual accuracy. This allowed for minor changes to the language used when quantifying evidence. DCSs felt that this language, such as using ‘most’ rather than ‘not all’ or that something ‘needs to be more consistent’ rather than ‘is not there’, is crucial to the letter placing the right emphasis onto the right points.
112. Letter consistency and quality improved in 2018. However, clarity about the extent to which issues identified as most in need of improvement are less than good or at risk of being less than good has not improved. Improving this would ensure that focused visit letters provide the clarity that LAs need.

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<sup>9</sup> ‘Framework, evaluation criteria and inspector guidance for the inspection of local authority children’s services’, Ofsted, November 2017; [www.gov.uk/government/publications/inspecting-local-authority-childrens-services-from-2018](http://www.gov.uk/government/publications/inspecting-local-authority-childrens-services-from-2018).

## Inspector well-being

113. Whenever there is change, we need to consider the workforce it affects. This section reports on elements of well-being, including working hours, the demands of inspection and the support systems available to help the workforce. As we did not have any baseline data from SIF inspections, the information discussed in this section is based on inspectors' perception rather than a direct comparison between ILACS and SIF inspection processes.
114. Our inspectors are working less in the evenings on standard ILACS inspections than SIF inspections. They do not find them any more demanding than SIF inspections. They see short inspections as more stressful and emotionally demanding than SIF inspections. We hope that, as short inspections become embedded and through the actions we are taking based on this review's findings, the demands will decrease with time and experience. SC HMI feel well supported by their regional teams to implement the new framework but less so by the national SC team. We hope that recent engagement and re-invigoration of our 'LA champions group', which provides a feedback mechanism between the inspector workforce and the SC policy team, will provide the support.

## Inspector working hours

115. We wanted to explore how inspectors perceive how their current working time on standard inspections compares with the time spent working on SIF inspections. Table 8 shows this. Note that this is not calculated on exact hours but on perceived difference. The majority of our inspectors (89%) perceive they spend the same or more time on an ILACS inspection, gathering evidence on site during an average inspection day. The University of Birmingham observed this to be nine and a half to 10 hours, including a working lunch. The majority of our inspectors (77%) perceive they spend less time working in the evening on an ILACS standard inspection compared with a SIF inspection. The distinction between time spent preparing at the weekends between ILACS and SIF inspections is less clear. These numbers show that while around one third (34%) of our inspectors perceive they work longer on site during a standard inspection than SIF inspection, three quarters (77%) perceive that they work less time in the evening during inspection weeks on ILACS standard inspections compared with SIF inspections.
116. This improvement to working hours in the evening was part of the aim when defining the methodology used on ILACS inspections. As teams work together to gather evidence in the same part of the LA, they need to take time to pause, analyse, write up and discuss evidence while on site. This team discussion would not happen off site. Therefore, there may be a reason why less time is spent working in the evenings.

**Table 8: Time inspectors perceive that they spend working on standard inspections in comparison to SIF inspections**

<b>Time spent on ILACS standard inspections compared to SIF inspections</b>	<b>Time spent on-site during an inspection day of standard inspection</b>	<b>Time working in the evenings during standard inspection</b>	<b>Time preparing at weekend before standard inspection (not travel time)</b>
Less time than on SIF inspections	7% (3)	77% (34)	23% (10)
Same time as on SIF inspections	55% (24)	16% (7)	41% (18)
More time than on SIF inspections	34% (15)	2% (1)	32% (14)
N/A (did not inspect under SIF)	4% (2)	5% (2)	4% (2)

117. Unlike the SIF, the ILACS framework does not define a list of people that inspectors must meet with on inspection. This possibly allows them to define and focus their evidence collection to the specific lines of enquiry, giving them the opportunity to analyse and record it on site. We did not specifically ask inspectors what has changed that means most of them work the same time on site but less time in the evenings. However, in terms of inspector well-being, we see this as a positive change.

118. The responses recorded in table 8 do not differentiate between team and lead inspectors. The roles may require different working hours, which we cannot report on. The responses are also about standard inspections. Due to the small number of short inspections in 2018, we did not ask for time comparison between these and SIF inspections. Qualitative insights from the inspector survey suggest that these answers would be different for short inspections, with a greater number of hours worked during the inspection week.

### **Demands of inspection**

119. As well as looking at working hours, we also asked inspectors about the demands of ILACS inspections compared with the SIF. We hope that understanding these would give a sense of potential workforce concerns that could lead to staff turnover.

120. There is no strong view as to whether standard inspections are more or less stressful and emotionally demanding or more or less intellectually demanding than SIF inspections. Most SC HMI feel that ILACS standard inspections are stressful and emotionally demanding. Even more feel they are intellectually demanding. It is pleasing that so many of our inspectors feel stimulated by their work. We recognise that children's services is a sensitive and emotionally

challenging sector to inspect and know we need to keep good support systems in place.

121. A larger proportion of SC HMI who had delivered short inspections felt they were more stressful and emotionally and intellectually demanding than standard inspections. We know from analysis that inspectors feel less confident carrying out short inspections, even though reliability levels are good (see [‘inspection system rigour’](#)). Given that this is a new inspection framework and that we carried out few short inspections in 2018, it is not unexpected to hear that inspectors feel that this radically different inspection format is demanding. As short inspections become more embedded in 2019, we will continue to review inspectors’ feedback. This will ensure that we can put suitable support in place as necessary.
122. The numbers above show that a large majority of SC HMI feel that ILACS inspections are intellectually demanding. This appears to contradict the qualitative feedback received from SC HMI and SHMI that some inspectors find some aspects of the inspection methodology repetitive. Sitting with social workers and reviewing cases is a necessary part of the inspection process but the nature of this work is repetitive. Inspectors reported in focus groups that group evidence collection without team members leading a specific strand of evidence collection (as happened under SIF) has diminished their opportunity to develop expertise in a specific area. This, along with the large amount of time spent case-tracking during inspections, has led to some inspectors feeling they do not have the opportunity to advance their knowledge under ILACS in the same way they could under the SIF. While inspections may be intellectually demanding, it may be that inspectors do not feel they are intellectually advancing.
123. Education HMI have no strong view as to whether ILACS inspections are more or less stressful and emotionally demanding or more or less intellectually demanding than their regular school inspections. Just over half of SCRIIs rate ILACS inspections as more stressful, emotionally demanding and intellectually demanding than their routine regulatory inspections. Through implementing a new programme of training for these inspectors, we hope these demands will ease. Once the training has been fully implemented, we will review its effectiveness and assess whether any further support or changes (such as additional time on inspection) are needed.

### **Systems of support and feedback**

124. Support systems and feedback mechanisms are essential to provide support to employees, to understand reasons for and resolutions to variable practice and to give the opportunity, especially in the case of a new inspection framework, for employees to seek advice, report challenges and share good practice. In our survey, most SC HMI said their regional teams have effective systems of support to help implement ILACS. However, a much lower proportion of SCRIIs

or education HMI report the same support. This may reflect the scheduling difficulties, as detailed in '[inspection system rigour](#)'. The University of Birmingham highlighted that the QAM role does provide some support during the inspection process but this could be improved by focusing beyond the practical tasks to supporting the emotional needs of inspectors.

125. The majority of SC HMI said that they received sufficient training and had sufficient opportunities to ask questions about how to inspect under ILACS. The results are less clear cut for education HMI. They show that SCRIs in the main do not feel they have sufficient training opportunities. We have developed a new training programme for SCRIs and education HMI to further support their training needs.
  
126. A quarter of SC HMI said there is an effective internal system of feedback to help improve the framework. However, for this review we saw excellent participation in focus groups and the response rate to the survey was high. These focus groups and survey make up part of the feedback system but, due to the time lapse from participation to report completion, may not be viewed in such a way. The SC policy team spoke with every inspection team immediately after each inspection from January to August, had recall days in April and December for all HMI working on ILACS inspections, and provided the opportunity during inspection review discussions for lead inspections and SHMI to provide feedback about the framework. During the framework development, the team also formed the 'LA champions group' to provide feedback and assist with refining the framework. Its re-invigoration will hopefully provide a more obvious mechanism for inspectors to feed back about the framework.

## **Appendix 1: Detailed methodology**

We used a mixed methods approach in this implementation review. Through this, we gathered a large amount of evidence about the different areas of the ILACS framework. This was both qualitative and quantitative and allowed us to triangulate findings. Full details of the methods used and the samples included are given below. Where possible, all samples included representatives of all eight Ofsted regions.

### **Engagement with inspectors**

We held face-to-face focus groups with SC HMI. We held these at an ILACS recall day so the majority of SC HMI were in attendance. Over 30 SC HMI participated in one of three focus groups.

We used qualitative insights from the focus groups, as well as other methods, to develop an inspector survey. The survey allowed us to quantify the insights we had heard. It also allowed us to look at responses of those who had experienced short, standard or both types of inspections; plus those who had been a lead or team inspector.

The survey was open to all inspectors (HMI and SHMI) who had delivered an ILACS focused visit, short inspection or standard inspection as a lead or team inspector. In total, 40 SC HMI and four SHMI responded to the survey. This in an 83% response rate. We believe this represents the majority of SHMI who had been a lead or team inspector for ILACS focused visits, short and standard inspections.

We ran five focus groups, over the telephone, with nine SCRIs and nine education HMI who have worked on ILACS inspections. These were small-group discussions with three to five participants in each. We ran these to accommodate as many SCRIs and education HMI as possible.

Once again, we used the qualitative insights from the focus groups, as well as other methods, to develop two surveys: one for SCRIs and one for education HMI. This allowed us to quantify the insights shared in the discussions. It also allowed us to explore any regional differences in responses and any differences depending on the number of inspections an individual had completed. Thirteen SCRIs responded to the survey, which represents an 81% response rate. Thirteen education HMI responded to the survey, a 62% response rate.

### **Evidence base reviews**

To test reliability of inspection judgements, we independently reviewed three standard inspection evidence bases and three short inspection evidence bases. Each evidence base was reviewed by two different groups of two inspectors. We reviewed each evidence base twice so as we could compare on-site and off-site judgements. This gave us an understanding of whether this was a valid method for reviewing evidence bases, giving us greater confidence in drawing conclusions from the findings.

No inspectors were given an evidence base of an inspection they had worked on. No inspectors were informed of the LA's judgement grade at the start of the inspection, nor the judgement grade given for the inspection they were reviewing. We deliberately did not give this information so that inspector teams had to reach their own judgements, rather than looking for agreement with a given judgement.

We used evidence bases for three standard and three short inspections. The choice of which inspections to use was limited. We needed evidence bases that were accessible online, rather than including physical notebooks, for ease of redaction. The online evidence base therefore needed to be comprehensive. Given the relatively recent move to online evidence recording, plus needing to ensure that no inspectors could review an inspection they had worked on, or the inspection of an LA they had delivered a focused visit to, the number of sample of possible inspections to use was small.

Each evidence base was redacted with the aim that this would prevent inspector teams identifying the LA. Due to inaccuracies in redaction and inspectors' wide knowledge of LAs, all teams identified the LA whose inspection they were reviewing.

Inspector teams were given two days to review the evidence base. By the end of day two, each team provided an overall judgement for the LA, plus the three individual judgements: help and protection; children in care and care leavers; and leadership and management. Teams identified the strengths of the LA and areas for improvement. We also asked teams if they agreed with the key lines of enquiry that focused the inspection and any additional key lines of enquiry they might have added.

## **Review of inspection reports and focused visit letters**

We reviewed 10 inspection reports and 29 focused visit letters for adherence to guidelines and consistency in content and tone. The sample contained documents with a good regional spread, publication dates across the first year of ILACS and was representative of grade levels (at last inspection). Reports that had previously been reviewed by the SC policy team were excluded from the sample. We reviewed a greater number of letters, both due to the fact we had delivered more focused visits than inspections and because we expected there to be less consistency in letters than reports. Reports are subject to a national QA process, whereas the QA process for letters is completed in regions.

Three SC HMI reviewed and rated the documents based on a number of content and tone criteria developed by the evaluation team. The criteria were largely derived from the details given in the 'reports and letters' section of the ILACS framework. Once all documents had been reviewed by HMI, we analysed the data to identify consistent and inconsistent practice. Where we identified inconsistencies in the documents, these were discussed with the HMI to determine whether these were significant and required improvement.

## **Review of regional risk assessment processes**

We interviewed SHMI from every Ofsted region to understand their regional risk assessment processes. The ILACS system should be based on robust regional risk assessments, giving a proportionate inspection schedule in which we hold our nerve to support LAs. The risk assessment process is vital in decision-making around when and what to schedule in terms of focused visit and inspection activity.

The ILACS framework does not set out a specific process for risk assessment or the recording of this. Some variation between regions would therefore be expected. However, we would expect to see consistency in the intelligence used in the risk assessment process, consistent application of thresholds to determine the type and timing of inspection activity and a regional process for recording these decisions.

SHMI were asked to explain their generic risk-assessment process, sharing details of the intelligence used in the process and any system they use to record and update the decisions made. Before the interview, the evaluation team selected three LAs in each region. The SHMI was informed of these and was asked to talk through the decision-making process for those specific cases. The interviews took place via Skype, allowing for SHMI to share their screens and the evaluation team to see the information and intelligence that had fed in to each of the cases. Having explored the pre-selected cases, SHMI were asked if they had any specific cases they wished to share. This allowed them to showcase more challenging cases, or cases that clearly showed proportionately or holding their nerve, where this may not have been apparent in the pre-selected cases.

Because SHMI quality assure focused visits and inspections, we also used the interviews to probe their perception of the strengths and challenges of the ILACS framework. This was informed by their own opinion, plus their interactions with both inspectors and LAs.

## **Interviews with DCSs**

We interviewed 16 DCSs. This sample included at least one DCS from each of Ofsted's regions. Regional directors and regional teams were asked to suggest DCSs for participation. LAs that had been shadowed by the University of Birmingham were not included in the sample. The sample did not aim to be representative but included DCS working in LAs that had different judgement grades (from inadequate to outstanding). It included LAs that had experienced focused visits, short inspections and standard inspections. This helped us to ask about a range of interactions.

Interviews were carried out by telephone. They lasted between 1 hour and 1 hour 30 minutes. The interviews were semi-structured but included questions on self-evaluations, annual engagement meetings, focused visit and inspection experiences (as appropriate), and ILACS framework development, including any changes DCSs would like to see.

## **Analysis of proportionality of inspection activity**

We commissioned analysis from our data and insight SC team on the number and proportionality of ILACS inspection activity in 2018. This gave us the details of the number of annual engagement meetings, focused visits, and short and standard inspections that had been delivered. The analysis also gave us the number of LAs at each judgement grade (based on their SIF inspection judgement), in each region, that had experienced inspection activity in the last year.

The team analysed the average number of days of inspection activity LAs at each judgement grade (based on their SIF inspection judgement) had received in 2018. Inspection activity was based on two-day focused visits, two-day monitoring visits, five-day short inspections and 10-day standard inspections. This allowed us to explore proportionality based on the judgement grade of LAs.

## **Analysis of inspection efficiency**

We commissioned our finance team to provide some analysis on the efficiency of the ILACS framework in comparison to the SIF framework. Using the LAs inspection judgements as they stood at the start of 2018 and assumptions based on the number of monitoring visits, focused visits and the type of inspection LAs of different judgement grades would receive, they calculated an estimate of the number of unique LAs Ofsted would visit or inspect in each calendar year. This was also completed for SIF inspections.

Alongside this, the finance team gave details of the number of full-time HMI and SHMI employed to deliver the ILACS framework compared with the SIF framework. This comparison allowed the team to calculate the difference in cost between the ILACS framework and the SIF framework. Cost was based solely on inspector workforce. It did not consider the costs of travel or accommodation for inspections and visits. It did not incorporate the cost of analysts supporting inspections. It also did not include a costing of annual engagement meetings due to the variation of attendees between regions.

## **Independent inspection shadows**

We commissioned a team from the University of Birmingham to complete inspection and focused visit shadows. The aim of this was to look at inspectors' adherence to the framework, along with consistency in inspection practice, evidence collation and triangulation and reaching judgements. They shadowed two focused visits, two short inspections and two standard inspections across four different Ofsted regions. The sample was largely determined by availability.

## **Appendix 2: Independent Evaluation of the Implementation of Ofsted's Framework for Inspection of Local Authority Children's Services (ILACS)**

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**July 2019**

## Contents

<b>1. Introduction</b>	<b>43</b>
<b>2. A Short Overview of ILACS</b>	<b>43</b>
<b>3. Methodology</b>	<b>43</b>
<b>4. Findings</b>	<b>44</b>
<b>Evaluation Question 1</b> .....	44
4.1.1 <i>Using the Framework during Inspections</i> .....	45
4.1.2 <i>Methods of Leading Teams</i> .....	46
4.1.3 <i>Including the Views of Children and Family Members</i> .....	46
4.1.4 <i>Differences in How Time Was Spent with Social Workers</i> .....	48
4.1.5 <i>A Focus on Written Information</i> .....	49
4.1.6 <i>Observing Direct Practice</i> .....	50
4.1.7 <i>Context for Services</i> .....	53
4.1.8 <i>Summary of Answer for Evaluation Question 1</i> .....	55
<b>4.1 Evaluation Question 2</b> .....	55
4.2.1 <i>Consistency in Geographical Spread of Evidence</i> .....	55
4.2.2 <i>Consistency in Individual Inspectors' Practice</i> .....	56
4.2.3 <i>Consistency in Gathering and Interpreting Evidence</i> .....	57
4.2.4 <i>Consistency in Applying Evaluation Criteria and Forming a Judgement</i> .....	57
4.2.5 <i>Consistency in Relation to Focused Visits</i> .....	58
4.2.6 <i>Summary of Answer to Evaluation Question 2</i> .....	59
<b>4.2 Evaluation Question 3</b> .....	59
4.3.1 <i>Developing, Exploring, and Closing Down Lines of Enquiry</i> .....	59
4.3.2 <i>Short Inspections</i> .....	59
4.3.3 <i>Leadership and Management</i> .....	61
4.3.4 <i>The Emotional Experience of Inspections and their Impact</i> .....	62
4.3.5 <i>Summary of Answer to Evaluation Question 3</i> .....	63
<b>Bibliography</b>	<b>64</b>
	<b>67</b>

## 1. Introduction

Ofsted's new framework for Inspection of Local Authority Children's Services (ILACS) was published in November 2017 and was launched in January 2018. The University of Birmingham was commissioned by Ofsted to evaluate whether the changes it introduced are happening on the ground, and this report documents our findings.

Through being able to conduct this evaluation and especially having the privilege of observing Ofsted inspectors conducting inspections, we fully recognise the significant dilemmas and challenges faced by Ofsted in developing, designing, and implementing a framework to judge the quality of social work practice and the impact the services have on children and families. Inspection is challenging work and overall the inspectors we observed demonstrated a deep knowledge of social work, skill, professionalism and resourcefulness. Senior local authority leaders, managers and practitioners we interviewed believed ILACS was an improvement on previous inspection frameworks and this is a success in itself. There are areas where the ILACS framework achieves its aims and where the inspectors are able to do as the framework intends. There are also, however, some areas where the framework is not being implemented as intended, either due to some inspector's preferred ways of working, or because the framework itself does not enable inspectors to achieve the inspection aims.

## 2. A Short Overview of ILACS

Ofsted took over the inspection of local authority children's services in England in 2007. Inspection of Local Authority Children's Services (ILACS) is the fourth framework for inspection used since 2009 (Hood, et al, 2019). ILACS is based on the principles of focusing on children and what matters most in their lives, being consistent in expectations of providers, and prioritising resources where improvement is needed most. It is intended to be proportionate and risk based, in that decisions about when and how best to inspect a local authority are based on the intelligence and information held by Ofsted, rather than following a fixed cycle. Furthermore, the ILACS framework is a systems approach, which includes Standard Inspections (2 weeks onsite), Short Inspections (1 week on site), Focused Visits (2 days on site), Monitoring Visits, and, Joint Targeted Area Inspections (JTAI). In addition to on-site activities, the inspections rely on local authorities' self-evaluations. All local authorities have annual engagement meetings, while local authorities judged to be 'inadequate' receive continual monitoring. The ILACS framework is a methodology within which inspectors are expected to exercise professional judgement and focus more than in previous frameworks on children and their experience and social care practice in a way that is honest, transparent and fair. The framework represents a shift away from the focus in previous frameworks on inspecting leadership and partnership arrangements from the 'top down' towards a much stronger focus on inspecting practice. Under ILACS inspectors are expected to now look at the *impact* of leaders on social work practice, rather than leadership, management and governance in a more abstract sense. ILACS has attempted to improve grade descriptors, refocusing them away from processes and more towards impact type statements and removing the need for lengthy descriptions of services and the need to say something against each descriptor. The framework is predicated on gaining information from a range of sources, with a large emphasis on spending time with social workers, which it is intended will take up the majority of the inspectors' time on inspections.

## 3. Methodology

Despite wide recognition of its significance, there has been limited research into inspection of children's social care and inspection methodology more generally. Recent research has analysed performance indicators and Ofsted ratings in English child protection services (Hood et al., 2016), factors associated with better inspection results (Wilkins and Antonopoulou, 2019) and the findings, ratings and recommendations of Ofsted reports (Hood, et al, 2019). The research methods used in these valuable studies have included analysis of documents and statistics relating to inspections. There is a surprising absence of qualitative research that has explored how inspections are actually carried out, what inspectors do, how they make decisions about the quality of services, social work practitioners' and managers' experiences of being inspected and service users' and carers' experiences when they are included in inspections. Our evaluation adopted a qualitative methodology and used ethnographic methods of participant observation to observe two focused visits (FVs), two short inspections, and two standard inspections. We spent a total of 25 days onsite with inspectors and observed inspections/focused visits for a total of 200 hours. In this time we observed the inspectors engage in all aspects of their role and inspect all components of the local authority children services. The shadowing of participants enables research to go beyond what they say they do to provide data on what they can be seen, heard and experienced as actually doing (Ferguson, 2016). We followed the inspectors around observing what they normally do, staying silent and taking notes, as far as possible seeking to fade into the background. We observed some of almost everything that inspectors do – including in set-up and introductory meetings with local authority senior managers, interacting with team managers and social workers about their practice, at meetings with groups of professionals, remote sampling cases on computers in the inspectors' team room, discussing and interpreting evidence, keeping in touch meetings with senior leaders, the meetings at which inspectors reach a judgement, and the meeting at which the judgement was fed back to senior LA managers. We saw inspectors doing some things, such as interacting with social workers, on multiple occasions. It is important to emphasise that this evaluation took place early on in the implementation of ILACS. This is particularly relevant to short inspections as there had been so few and those shadowed were some of the early ones to be delivered.

After the completion of the focused visits / inspections we conducted 18 interviews with 17 inspectors (one of them about two separate inspections/visits). We interviewed the five DCSs and a CEO whose services we had observed being inspected. We also interviewed seven Ofsted representatives about the background to, design and purpose of ILACS. And we interviewed 76 local authority staff whilst on site during the inspection, 45 of them social workers, who we spoke to just after their practice had been inspected. We also interviewed an Ofsted data analyst who played a pivotal role in analysing statistical data for inspections.

Ethical approval for the research was gained from the University of Birmingham ethics committee and all the participants involved gave formal consent to being observed and / or interviewed. The sites where the research took place and all participants were guaranteed anonymity.

## 4. Findings

This section brings together and summarises the findings of the research in relation to the evaluation questions we were asked to answer.

### Evaluation Question 1

*Are Ofsted focusing on the things that matter most to children's lives?*

- *How well are inspection teams evaluating service quality and its impact on children against the evaluation criteria in the ILACS framework? For example, how much attention is given to:
 
  - *Making good decisions for children;*
  - *Participation and direct work with children?**
- *What are the common features of an inspection when: (a) this works well? (b) it works less well?*
- *To what extent do the topics and areas of focus on ILACS inspections relate to the wider evidence base on what matters most to children's lives?*

#### 4.1.1 *Using the Framework during Inspections*

Our observations of inspections enabled us to see not only what Ofsted inspectors do, but how incredibly hard they work. The hard work began in earnest the week before they arrived on site to begin inspecting. Time and again we were told that 'week zero' is 'hugely important' in how data is used to identify lines of enquiry and develop hypotheses. A profile of the LA's performance is established by the LI working with Ofsted's data analysts, drawing, for instance, on standard information and data produced by LAs for the DfE in their annual census of Children in Need and Children Looked After, and workforce data. Ofsted ask for a list of all recently audited cases and a sample of 6-12 cases are chosen and examined to ascertain whether the LA understand what good practice is and if their actions are making a difference to helping and protecting children. While the lead inspector (LI) spends the entirety of week zero preparing for the inspection, the inspectorate team have two days (Thursday and Friday) and a lot of reading. LIs are crucial to pulling it all together. Once on site, inspectors always spent at least nine and a half to ten-hours a day in the LA offices. The days they were inspecting followed a typical but flexible pattern. Most days they were in the social work offices by 8am and began with an 8.15 team meeting, at which they reviewed again the previous day's work and evidence and planned the day ahead. At 9am each day a Keeping in Touch (KIT) meeting occurred, attended by the LA senior management team, the lead inspector and one other inspector. At the same time (9am) the other inspectors began collecting information, usually by leaving the inspectors' 'team room' and meeting with social workers and their managers. They then returned to the team room to write up their findings, with a short break - which usually involved working and eating - and sometimes a meeting at lunchtime. This was followed by further collection of evidence, writing time and a team meeting at circa 5pm at which they discussed the data collected over the day and formulated some conclusions and feedback. We timed what we observed inspectors doing and of the nine and a half to ten-hours a day on site approximately six hours of their activity was spent directly gathering evidence face-to-face with LA staff. Some of this time was spent with managers, but these meetings were usually brief (often 10-20 minutes). The majority of evidence-collection time was spent sitting with social workers (and other staff) at their desks and computers. The other main activity was remote-sampling of cases on the computer and reading other documents.

There was a broad consensus among all groups of participants that ILACS is generally considered an improvement on previous frameworks. We observed the ILACS framework being used by all inspectors on all of the inspections we attended. The inspectors had physical copies that they carried around and referred to often throughout the inspection. The framework was used to guide the LI in week zero and by some to organise the team meetings and discussions. It was used by team inspectors to write their summative statements and by inspectorate teams to organise their

collective evidence and to write the final report. In short, the evaluation criteria were central to the inspection process. Generally speaking, we found consistency in the methods used to implement ILACS, although there was significant variation in approach in how these methods were applied to gathering data/evidence and in the interpretation of evidence.

#### 4.1.2 *Methods of Leading Teams*

A key component of the ILACS framework is collective evidence gathering, reflection, and analysis. The information the teams collected was vast and complex. Keeping track of this information was a demanding task in itself, made harder by the need to present the information in accessible ways to others in a very short time span, make sense of this information, and then compare and contrast this with the evaluation criteria. We observed teams that were led in ways clearly committed to the spirit of the ILACS framework of collective discussion and analysis, ensuring this time was protected and the team meetings attended, with good facilitation of group discussions. The inspectors asked each other questions, challenged respectfully, and came to collective decisions about the evidence. We also observed some teams taking a different approach, using a more rigid process for team meetings, with the LI taking a more dominant role over the rest of the team, spending less time on group discussion, with less challenge of each other, and the LI offering an analysis for the group to ratify or challenge. It could be argued that the latter method was more 'efficient' in that it took less time. However, the group discussions in the former method were a more useful way of coming to a collective view about what was found and seemed closer to the spirit and methodology intended by ILACS.

#### 4.1.3 *Including the Views of Children and Family Members*

At the heart of the framework is an intention to focus on what matters most to children's lives and we frequently saw inspectors thoughtfully probing statistical data, social workers, and managers about children's experiences. Yet there was no consensus about what 'what matters most to children's lives' meant, leading to some differences in what information inspectors felt it was important to gather. Some felt that this could only be properly determined by inspectors speaking to children and their families. The framework specifically states that inspectors can gain in-depth views about the quality of social work practice by speaking with children and families directly. We did observe that each inspection included a meeting with a small group of children in care and care leavers. Some inspectors, however, believed these meetings to be of limited value, in part because they included children and young people from, for instance, the Children in Care Council who are the most motivated to volunteer for such things and thus only provide a selective view of the experiences of the total population of children in contact with social care. While at least some consideration is given to gaining the experiences of children and care leavers, the voices of children in need of help and protection are completely absent. The same is true of how little, or no, effort is made to take into account the experiences of parents, despite there being provision for this within ILACS. Inspectors did not seem to give attention to the point in time survey.

Some staff who had experience of several past inspections recalled a relatively extensive survey of parents being done. For example, one senior staff member who had just been interviewed by an inspector about the part of the service they held responsibility for said:

*I don't think that is done now and in the past I have set up user groups for inspections, so how are they triangulating other than asking us how we are triangulating what parents experience. If they are relying on us purely that is a missed opportunity to find out more from the family themselves. The Inspector just*

*asked me what was different for those children, but what they should have been doing is asking the children and family. If they don't have a space to talk to families it's a missed opportunity. Accepting that Inspectors are under a lot of pressure to wrap an inspection and are now using scarce time to be with social workers rather than listening to senior managers telling the story they want to tell. It would be good if a bit of that shift involved spending time with children and families asking how did it feel for you and what difference did it make. And that is what they want to know.*

Inspectors placed a great deal of emphasis on how they sought to evaluate services by triangulating the evidence they had obtained from a variety of sources – including case files, interviews with social workers, audits, performance data, and so on. However, the vast majority of the evidence gathered did not include the direct experiences of service users, so evaluation was done at a distance from, and without consultation with, the very people the data that was being triangulated was about. Impact was sometimes interpreted as a measurable variable, usually meaning the focus was on an organisational outcome rather than the experience of the child. There is evidence that organisational outcomes cannot be considered a proxy for quality of practice or material changes in the experience of family members (Hood et al., 2016). In contrast, impact was sometimes interpreted as an imaginative activity, usually leading inspectors to ask questions and imagine what the experience must be like for the child. Such differences in interpretation about impact alter the practical meaning for inspectors about what a 'good decision for children' is. But either way, the voice of the child and family was largely absent. Some inspectors were very critical of this oversight and felt more direction was needed from Ofsted about its importance and how it should be done. Some inspectors and Ofsted leaders were also concerned about the ethical issues raised by involving children more in inspections, of them having to experience yet another new professional moving quickly into and out of their lives for the purpose of gathering very personal and possibly painful information from them. Our recommendation is informed by the experience gained from researchers, which suggests that once provided with adequate information about the purposes of gaining their experience, children are capable of giving informed consent and the risk of harm can be minimised.

**Recommendation 1:** Ofsted should ensure that the requirement to gain the views of children and families as outlined in the ILACS framework is implemented. The framework itself is basically sound in this regard, but is not being implemented effectively in practice. Ofsted needs to introduce a systematic approach to gaining the views of children and families who are involved in all aspects of service provision: Early Help; Help and Protection; Looked After Children and Care Leavers. This means a focus on gathering direct testimony from a sample of children and also parents/other carers. Some inspectors had much more understanding of the value and need to incorporate the perspectives of the child and family into their inspection activity than others and some had reservations due to ethical concerns. Ofsted need to clarify what is expected of inspectors in gaining service user feedback and provide the necessary information and training. To ensure that seeking the views of those involved in the cases inspectors look at is done ethically, Ofsted need to provide children and families with information about the process, what is being asked of them, what Ofsted will do with the information, and what safeguards are in place if they do disclose information that gives rise to concerns. Standardised information sheets and consent forms should be developed by Ofsted. This will ensure that family members can provide informed consent to giving information, that expectations about the process are clear, and the children are protected from any potential

harm that could arise from undertaking such a task. Inspectors should work alongside the children and family social worker and/or family support staff to ensure the child's well-being is monitored following their contact with the inspection.

#### 4.1.4 *Differences in How Time Was Spent with Social Workers*

One of the key changes that ILACS is seeking to create is for inspectors to spend more time with social workers and getting closer to practice than in previous inspection frameworks. This means that the nature and duration of those encounters are crucial to the effective implementation of the ILACS framework. Our observations showed that there were some differences in the amount of time inspectors spent with individual social workers. These differences were determined by a range of factors:

- The culture of the inspection team and individual inspector's commitment to and skills at relationship-based work with social workers - some were more curious, talkative and relational than others
- What inspectors wanted to find out and what the social worker had to offer, such as the sort of case examples the inspectors were looking for. If the social worker did not have case examples that related to the lines of enquiry being pursued, less time was spent on them
- External factors, such as another scheduled meeting to go to
- How many social workers were in the office and available to be seen.

Remote sampling, where case files are accessed through the computer system, was used to cover gaps in what could be found from social workers in the office and a certain amount of this is regarded as a legitimate form of evidence gathering within ILACS. However, we found that at times some inspectors / teams chose to spend less time with social workers and more time remote sampling, which does not fulfil the aims of ILACS. While there were some legitimate reasons for choosing to spend a more limited time with some social workers, the problems arose, so far as ILACS is concerned, when some inspectors chose this because they didn't see the added value in hearing directly from the practitioners and managers.

To clarify, what we observed inspectors doing and the implications of this, we found four patterns of evidence gathering about casework in time spent with social workers:

1. A primary focus on the case management system, thresholds, data management, and so on.
2. A focus on what cases revealed about how tasks are performed at particular stages, such as health assessments for children in care, strategy meetings in child protection inquiries.
3. A focus on aspects of cases rather than cases in their entirety, such as supervision, communication with children.
4. A focus on cases in their entirety, looking at the child's journey, relationships with parents, the extent of planning, inter-agency working, case recording, management oversight and so on.

Sometimes inspectors used all four forms of evidence gathering with the same social worker and sometimes they focused on only some. The ILACS methodology depends upon achieving as much depth as possible of understanding of how children and families are being worked with and children's experiences with respect to all four forms of evidence gathering. Spending as much quality time as possible with social workers, children and families must be central to achieving such depth. Our data suggests that inspectors were able to achieve this depth by spending at least 30 minutes

going through a case in its entirety with a social worker and it was often longer. We are not suggesting that all inspector-social worker discussions of individual cases by the computer should always involve at least half an hour per case. It depends on which of the four patterns of evidence gathering are occurring and sometimes spending shorter amounts of time per case is appropriate if the focus is only on, say, how strategy meetings are conducted. Inspectors are expected to go as far in a case as needed to evaluate the case, using their professional judgement to make a reasonable evaluation. They are expected to make a judgement as to when to stop and move on, even if this might surprise or disappoint social workers. But there was some variation among inspectors in the amounts of time spent going through the same kinds of cases. Some lines of enquiry were not pursued in enough detail and in some cases where the aim was to understand the child and family situation and the casework in its entirety, insufficient time was spent on it and the analysis carried out was not deep enough to achieve the level of insight required. It is vital for Ofsted to set clearer expectations for inspectors regarding time-use and the depth and quality of inquiry into casework that is required to effectively implement ILACS.

**Recommendation 2:** Ofsted needs to set clear expectations about the amount of remote sampling that is acceptable and the optimal time inspectors need to spend looking at individual cases in person with social workers to ensure the depth of data and understandings of practice are established. Ofsted and Lead Inspectors need to ensure sufficient time is allocated for inspectors to be able to achieve the depth of understanding required and inspectors' practice needs to be monitored during the inspection (see also 4.2.3 below, re staff development and quality assuring of inspectors' work). This applies to when inspections are pursuing particular lines of enquiry and to when cases are explored in their entirety to seek understanding of the social work practice with respect to relationships with children, parents, case / care planning, thresholds, inter-agency working, case recording, management oversight, supervision and so on.

#### 4.1.5 A Focus on Written Information

Eileen Munro, in her Review of Child Protection in 2011, argued that the children's social care system had become dominated by a compliance culture where 'process' in the sense of following procedures and performance indicators that relate to organisational processes and case recording practices was prioritised at the expense of focusing on children's experiences and outcomes. In her evaluation of SIF in 2014, Munro suggests Ofsted had been implicated in this by privileging evidence related to procedure, based on certain measures, such as whether and how many children on CP plans get their procedurally determined statutory visit from a social worker. Establishing what actually happened on the visit – the *quality* of the social worker's practice and the child and family's experience – gained less attention. In evaluating the SIF, Munro questioned the crude binary of 'process/practice' that she found in Ofsted inspections and critiques of them.

*In learning about how the service is functioning, one change that is sought is a greater focus on the impact the service is having on children's safety and welfare, reducing the focus on process as a sufficient indicator of good practice. This seems to be challenging, with both the sector and the inspectors continuing to talk of a process/practice divide, a division that arose from the audit culture's focus on records and professional tasks, without direct evidence about children. (Munro, 2014, p.13)*

Hood et al (2019) also found that the recommendations of Ofsted reports (pre-ILACS) were strongly oriented towards process issues and compliance with standards. We saw ample evidence to suggest that deep awareness of the process/practice distinction remains under ILACS. We frequently heard inspectors allude to this by claiming not be so interested in 'process'. Often, however, they would go on to reveal a preoccupation with just that, by giving a high value to professional tasks and what is written down. As far as we could see, sometimes making sure that it is written down did not make any discernible difference to the outcome for the child. Munro observes that one danger from process and practice being seen as alternatives is that process becomes less valued as the value that practice and outcomes are seen to hold increases. Good case recording is indeed a vital part of good social work. Our findings suggest there is currently no danger at all of inspectors undervaluing case recording and the completion of administrative tasks. While we found that under ILACS inspectors are spending a comparatively larger amount of time with social workers than appears to have been the case under previous frameworks, there is still a very heavy preoccupation with what is documented and ensuring things are written down.

In the spirit of the ILACS framework, we observed inspectors using discussions with social workers and looking at case files to attempt to understand and gain evidence of quality and impact, and while such methods provide some valuable insights into practice they cannot provide the whole picture in relation to the quality of practice or the outcomes for children. The method of looking at casefiles created a distance from actual practice and children's experiences. Inspectors, to differing degrees, looked for the child's voice, or what some called 'lived experience', both in case recording and in talking to social workers and other staff and some vivid accounts of work with children and its effects were elicited. What social workers said to inspectors certainly mattered, but our findings suggest that inspectors still placed huge emphasis on what could be ascertained from the administration and documentation of social work practice. Inspectors kept coming back to whether things were written down or not. While most inspectors informed us that the focus of the inspection should be on the impact of practice on children's lives, a lot of what we observed of what they focused on with social workers and remotely and the feedback to the LA related to improvement for the local authority related to improving administrative practice. Our observations found that relying so heavily on case files meant that the focus of inspectors was heavily on how well social workers and managers represent what they do in writing and on the administration and organisation of social work practice.

**Recommendation 3:** Two kinds of data are at the heart of the ILACS methodology: what is written down, especially on casefiles, and what inspectors hear about and see of practice. Fully meeting the aims of ILACS to enable inspectors to gain understanding of children's experience and the quality of the social work service by focusing more directly on their experience and practice is being prevented by too much emphasis being placed on gathering evidence from administrative processes and what is written down on case files. There is a powerful assumption within local authorities that Ofsted are primarily interested in what is written down. Ofsted needs to conduct an internal review with inspectors and with the entire sector about the minimum requirements for case recording and other administration. What is regarded as legitimate evidence about the quality of practice needs to be rebalanced by moving the emphasis away from the written word to focus more on what is learned about practice from discussion with professionals and service users and observations of practice.

#### *4.1.6 Observing Direct Practice*

We explored with Inspectors (and Ofsted representatives) the obvious question of what value observing social workers in practice with service users might have in establishing the quality of practice and children’s experience. Inspectors were generally sceptical about the value of observing social workers in practice with service users. The main reservation was that the time it would take and the limited number of observations they could do would not generate enough value to justify the effort, and the time is better spent doing other things. The precise focus of the inspection is influenced by the type of inspection. For instance, on short inspections Ofsted enter the inspection under the assumption that the local authority is good and the framework sets out how Inspectors should test how the local authority knows it is good. But a focus on practice and children’s experiences is meant to be common to all inspection activity under ILACS. Inspectors and the Ofsted representatives we interviewed who shaped the framework made a very persuasive intellectual and methodological argument for privileging data collection in the office, rather than observing practice. They emphasised the importance of the scale and scope of what they can capture under ILACS by not observing practice and spending the time considering the environment the managers have created, supervision, caseloads, whether the leadership and management have provided the necessary training, and being able to read and hear about the child’s journey overall.

As one inspector put it:

*Inspection teams talk about the trends we are seeing, not individual instances and reach a view having spoken to 9 social workers, for instance. ... We sampled almost 200 different cases [on the standard inspection], that is quite a big amount of casework we’ve looked at and that is just looking at practice and then there is all the reading we’ve done, including about the environment the managers have created. Last week a social worker told me about a piece of direct work she did with a child using a tool I had never heard of. I had read their workforce development papers during week zero and how an audit had shown up there were limited direct work tools being used and so they put on training into direct work with children and that is how this social worker knew about this new tool, which is good. So I got to see the full loop in how the leadership and management had led to training and the social worker acquiring the new tool she was using. If all you see when you inspect is the ‘three houses’ and the ‘three islands’ being used you suspect that there isn’t much creativity being encouraged.*

The way this approach provides some insight into the ‘full loop’ of practice, leadership and the system is important and valuable. The method that ILACS has introduced of four inspectors going into social work teams simultaneously to inquire into the same area of service, which we witnessed a great deal of, does provide a valuable degree of scale to the data collected. But what it does not do is provide the kind of depth of insight necessary to fully understand the nature and quality of practice and the experience of children and families. We found that the time inspectors spend with social workers varies, who they speak to is quite random, sometimes they run out of practitioners to interview and assessment of quality is over-dependent on the social worker’s capacities to articulate what they do and express themselves well on case records. While inspectors say they are ‘looking at practice’, what they are in fact doing is considering *representations* of it. What gets produced is evidence based on *accounts* of practice, rather than on closeness to practice itself. In recent years social work research has got much closer to practice by using observational methods and has been able to find out much more about what social workers actually do (Ferguson, 2011, 2016, 2017; Froggett, 2012; Gibson, 2016, 2019; Hall et al, 2014; Henderson, 2018; Killian et al., 2017; Winter et al 2017; Ruch et al, 2017). Findings that are based on seeing and experiencing what people do are

more reliable than depending upon what people say or write about what they do and they challenge the assumption that shadowing a home visit is a less productive use of time than being in the office talking to social workers and reading case files. Both are needed. Part of the issue is the value that is given to different kinds of evidence and our findings suggest that statistical data, audits and what is written in case files are often given greater value than talking to social workers. While our observations confirm that time spent talking with social workers about their cases is at the heart of ILACS, paradoxically the Ofsted workforce function on the belief that keeping a distance from actual social work interactions with service users enables them to better understand practice and the quality of a service. The ILACS methodology is ultimately too distant from practice as well as the views of service users to fully meet its aims of finding out what it is like to be a child in need of a social work service.

This conclusion is also heavily based on the views of social work staff at all levels, a majority of who regarded observation as the most effective way to reach a proper understanding of what they do. They felt that written records could be interpreted in different ways and do not reflect the skills of social workers on the ground. Inspectors, we were told, needed to, as one social worker put it, 'come and see what it's like'. We did not find any evidence in the inspections we shadowed that inspectors were conducting observations of LA staff in practice alongside service users and we did not see inspectors asking about such practices or looking for the evidence. Observational methods do not give simple, straightforward access to the whole 'truth'. Knowledge produced through participant observation is not an exact reflection of what happened, but the observer's interpretation and, as such, is contestable. However, getting as close as it is possible to get to social work practice enables some things to be seen and experienced that otherwise would be missed (Longhofer and Floersch, 2012). It provides the most authentic way possible to evaluate and understand the practitioner's skills and knowledge and the service user's experience. The presence of observers probably does change the observed encounter in some ways, but these are usually very subtle and people being observed by researchers often feedback that they behaved the same as they would have had the observer not been there (Ferguson, 2016). If the social worker-service user encounter is changed this is not necessarily in a negative way. While it is common for observation to make people feel anxious, social workers often report that they found being observed helpful because of how the observer's presence is silently supportive and containing and because of how the subsequent discussion about the encounter helps them to reflect on and learn about their practice and the service users' needs.

Possible differences between being observed by researchers and by Ofsted inspectors need to be considered. Are the dynamics different because Ofsted are explicitly there to evaluate the workers' practice and there may be concern that this will increase practitioners' anxiety levels in ways that negatively impact on their performance, meaning that Ofsted are not seeing them as they normally practice? It should be noted that research studies that have used observations have managed to do so successfully while being involved in some form of evaluation or analysis of social workers' practice. Social work education provides a particularly fruitful comparison with Ofsted perhaps in how observations are routinely used to assess the quality of students' practice on placement and the evidence suggests that the effects of power and other dynamics depends a great deal on how observation is carried out (Le Riche and Tanner, 1998). If the way it will be done is clearly explained to participants and conducted in sympathetic, reflective ways, the anxieties associated with being observed decline and trust develops between the observed and the observer. Some social workers we interviewed during inspections felt that being observed would be no more anxiety provoking than being interviewed by inspectors at the computer and even less so because it enabled them to show what they do and how they do it, rather than having to explain it all. The same principles and practices need to apply to gaining service users' consent to being observed in their encounters with social care. Ofsted will need to provide children and families with information sheets that outline the

purposes of observation and what it will involve so that they are capable of giving informed consent to it. Recent research suggests that the witnessing presence of (largely silent) observers is experienced by many service users as helpful (Ferguson, et al 2019; Westlake and Forrester, 2016). As Sarah Ashencaen Crabtree (2013) argues, there is a moral imperative to get close to practice because observation is crucial to unearthing service users' experiences of services, producing learning about what makes a positive difference to vulnerable people's lives and vital knowledge about problematic and even abusive practices that otherwise may remain hidden.

**Recommendation 4:** The aim of ILACS to get close to practice with children and families is welcomed within and outside of Ofsted. The dominant methodology of looking at performance data and casefiles, with or without social workers present, provides some important insights about practice and the organisation. It cannot however provide the whole picture. A majority of the people we interviewed from outside of Ofsted believed inspectors should be observing practice and doing so in a systematic fashion. ILACS needs to include observations of social work practice with service users as part of the core methodology for inspections. Direct observation of social workers in practice under ILACS can be achieved in at least three ways: 1. having at least one inspector designated as the practice-observer on each inspection; 2. all the inspectors doing at least one day of it; 3. more radically, having an inspector linked to specific local authorities undertaking observations of practice on an ongoing basis throughout the year as part of the system of inspection initiated by ILACS. We recognise that inspections have to be carried out with limited time and resources, meaning the challenge is to capture enough of the 'right' evidence with the resources available. Ofsted need to do more to ensure that practice observation is routinely happening in local authorities and evaluating the effect of this and the evidence from it. A more effective use of scarce resources by Ofsted would be to devote at least a quarter of the time spent on short and standard inspections to observations of practice, meaning that at least one inspector would be doing this for the duration of the evidence gathering. The social workers and cases to be shadowed could be selected by aligning them with lines of enquiry and the cases looked at in the office. A sub-sample of the casework discussed with social workers in the office could be selected for shadowing and the children and parents in the same cases interviewed as part of the inspection, thereby also helping to meet the requirements of ILACS to take account of service user's experiences. Triangulation of the data from this range of sources – casefiles, audits, performance data, interviews with social workers and managers, observations of practice and interviews with children, parents/ other carers - would provide rich case studies and evidence that gets as close to practice and the quality of the service and children's experience as it is possible to get. Observation is an acquired skill and Ofsted could usefully establish a group of inspectors who develop expertise in the observer role. Our experience is that the more observations are carried out in an office and across a local authority and are known to be conducted in sympathetic, reflective ways, the more trust develops among those being observed and the anxieties associated with being observed decline. This is why so many social workers report valuing the learning opportunities that come with being observed. Some inspectors are concerned that implementing ILACS is repetitive and deskilling, and doing direct observations of practice would bring more life and variety into the work and assist with staff retention.

#### 4.1.7 *Context for Services*

In terms of the wider evidence base, there is considerable research and evidence that the overwhelming context for the majority of families in contact with children’s services is an experience of poverty and deprivation (e.g. Morris et al., 2018). We observed many conversations about issues related to poverty and deprivation within the inspection teams and between inspectors and local authority staff, yet we did not see these issues influence the overall evaluation or judgement. We were told that this was due to the need for Ofsted to maintain a consistent national standard, with ‘good’ as the benchmark. The danger of such an approach is that inspections just find poorer areas, where the demand is greater and the service less able to meet the need, are less able to meet the national standard. Indeed, this is what recent research has found. Hood et al, (2019), Bywaters et al. (2017), Wilkins and Antonopoulou (2019), and Ofsted’s own data (2017) have all found, albeit to differing levels, a relationship between the level of LA deprivation and the overall judgement grade provided. Wilkins and Antonopoulou (2019), for example, suggest that ‘one might expect that ‘good and outstanding’ authorities have lower rates of re-referral and repeat CP plans than other authorities—but in the sample we considered, they did not. However, ‘good and outstanding’ authorities did outperform other authorities in terms of procedural compliance, for example, having fewer overdue assessments, CP visits and CP conferences’. Of all the variables Wilkins and Antonopoulou (2019) considered, they found only one that by itself predicted membership of the ‘good and outstanding’ category. ‘The more deprived the authority, the more likely it was to be judged ‘in need of improvement’ or ‘inadequate’ and the less deprived the authority, the more likely it was to be judged ‘good and outstanding’... Ofsted themselves have become aware of this potential relationship, stating in their latest annual report, ‘We have begun looking at these [data] and we found some correlation between the level of deprivation in the area and overall effectiveness (2017b, p. 70)’ (Wilkins and Antonopoulou, 2019, p.15). Wilkins and Antonopoulou’s (2019) research is based on pre-ILACS data (2014-2016), as is Hood et al’s (2016; 2019), and it will be very interesting to see what these outcomes are under ILACS. This suggests that if the context in which practice takes place is not taken into account, responsibility for wider systemic issues is placed on individuals and the organisation, ignoring or down-playing the wider issues that have a highly significant impact on organisational performance and the lives of families.

There was a broad agreement between all of the inspectors and local authority staff that services operate within a specific context. The inspectors were very familiar with the demographic and socio-economic context for specific organisations, senior leaders explained the context at the start of the inspection, and the inspectors discussed it between themselves. Issues of poverty, deprivation, inequality, changes in pay and recruitment practices across the region, political changes, and increases or decreases in investment were explicitly outlined for each inspection. We could not see how any of these contextual factors played a practical role in the analysis and grading of the service. This seems to fit with the intention of the inspection framework to operate from a national standard of ‘good’ and expect local authorities to address the challenges of how they achieve it. However, this produces contradictions and tensions in the work of inspectors who are aware of and concerned about social conditions but have no real way of taking them into account in their evaluation of the service. This also provides risks to the validity of the judgement and acceptability of it within the profession. A more proportionate approach would be to take the context into account within the evaluation.

**Recommendation 5:** Research and practice evidence shows that the overwhelming context for the majority of families in contact with children’s services is an experience of poverty, migration, austerity, deprivation and so on. While LA staff make this context clear and

inspectors appear to be sensitive to it, the impact of this context on a service should be much more clearly defined and outlined for all focused visits and judgement inspections. It needs to be much clearer how such contextual factors are meant to play a practical role in the analysis and grading of the service. How this context relates to the quality of practice should be clearly analysed and the ways it was taken into account in reaching a judgement about the quality of the service need to be fully explained. The impact of the intention of the inspection framework to operate from a national standard of 'good' and expect local authorities to address the challenges of how they achieve it needs to be reviewed.

#### 4.1.8 Summary of Answer for Evaluation Question 1

So are Ofsted focusing on the things that matter most to children's lives? In short, ILACS does get closer to social workers than previous frameworks did and it results in some important insights about practice. However, it relies too heavily on 'process' data and the internal workings of the organisation rather than being centred in the experiences of children and families and looking at the quality of direct social work practice.

## 4.1 Evaluation Question 2

*Are Ofsted consistent in their expectations of providers? (includes consistency of inspection practice)*

- *How consistent are the inspectorate in scope and methodology on inspections? Are inspection approaches/methods the same when looking at the same aspect of a service?*
- *On a focused visit, to what extent do inspectors work as a small team looking at the same types of cases at the same time? How often do their evaluations concur?*
- *What happens when there is conflicting evidence? How does the team dynamic work to arrive at its judgement?*

#### 4.2.1 Consistency in Geographical Spread of Evidence

ILACS balances a tension between consistency and flexibility. There needs to be sufficient consistency in inspection practice, judgements, and decisions for there to be confidence in the analysis, while there needs to be flexibility in inspectors' practice to gain the evidence they believe is necessary to identify issues and concerns. We observed the inspectors working very hard to ensure the judgement inspections covered the scope of the framework. While this evaluation did not seek to judge the decisions the inspectors reached, it did seek to identify the processes through which these decisions were made. This tension between consistency and flexibility ultimately related to the sample used and how the evidence from that sample was interpreted.

We observed inspectors use a range of data and evidence in week zero to develop lines of enquiry, choose specific geographical locations, select specific teams, and sometimes choose specific cases to look at. There was a level of consistency in how the teams of inspectors sought to collect information but flexibility in what information was collected. What this method does well is enable the teams to investigate targeted areas of practice and come to a view about the themes within these areas. There was, however, a practical limitation to the inspections that affected the information gathered. Given the size of the inspection teams and the time they had to undertake the inspection, decisions had to be made about what would be looked at. Sometimes the teams looked at practice in all of the geographical locations in a local authority if it was small. Sometimes the geographical locations looked at were a very small proportion of the whole area. So while this method does enable the

inspectors to identify themes and issues within a service, consistency in terms of the spread of practice looked at is not always achieved across inspections. Remote sampling is one way that the gaps created by time and resource limitations were filled, especially in large areas. Inspectors can read cases and discuss them in person with social workers in the office they are based in, while also reading some case files remotely that come from other offices across the authority. But without being able to sample from all geographical locations in a service, it isn't possible to know how widespread identified issues are. This is not to say the issues are not important but that conclusions based on these issues may or may not relate to practice across the whole service. Indeed, a number of the senior managers we spoke to suggested a different conclusion may have been reached if the inspectors had visited different social work teams.

#### 4.2.2 *Consistency in Individual Inspectors' Practice*

In terms of consistency of individual inspectors' practice, broadly we observed the inspectors doing very similar things. But how the inspectors went about selecting what to look at, the lengths of time they spent with social workers, and what was discussed did vary. Sometimes the teams chosen to spend time with had very few social workers and so different teams had to be selected at the last minute. Sometimes inspectors wanted to look at specific cases and asked the social workers to bring these up on the computer but mostly the inspectors chose a social worker to sit with at random and asked to see their caseload. Sometimes the inspector chose from this caseload at random, sometimes they asked for a specific type of case, and sometimes they asked the social worker to select a case. Some inspectors sought to look at similar documents on case files and ask the same questions of social workers for each case they looked at, while others did not have such a structure to the interaction. All of these choices influenced the evidence that was eventually collected. This demonstrates the level of flexibility for evidence gathering under ILACS on the one hand and the lack of consistency in this process on the other. How ILACS was implemented within the inspections we observed generated evidence that was too random and contingent.

**Recommendation 6:** Ofsted sample cases on the basis of those that demonstrate something to them, as determined by lines of enquiry. There is also a great deal of sampling that is random and done on the basis of convenience, in terms of what managers and practitioners happen to be present in the office. Ofsted need to implement a more rigorous, systematic approach to selecting the cases for inspections. While some cases are selected in advance as part of following up lines of enquiry, many more are selected randomly and due to their convenience. A more rigorous, systematic approach would involve enabling inspectors to sample in purposeful ways where case selection is clarified according to standardised criteria that, in addition to identified lines of enquiry, are sensitive to: practitioner specific issues (length of experience, gender, ethnicity, team, supervisor etc) and case specific issues (the nature of risk and harm; length of involvement with the local authority and types of relationships; children's and family experiences). HMI need to exercise the authority their powers give to them to use as an inspectorate. This means that if HMI find a case they wish to explore further the LA should provide someone for that discussion even if the social worker or team manager are unavailable. Greater confidence in the breadth and depth of the issues identified by inspection teams could be achieved by a more systematic approach to case sampling. The feedback and final report should clearly outline the nature of the sample looked at, the size, and variation within the sample. This should include being clear that Ofsted's findings are related to what they see and cannot be taken to apply to all cases.

Inspectors could benefit from training that enables them to build rationales for inclusion and how representative the sample is. Great transparency about the limitations and strengths of the samples will both provide for more rigorous sampling and boost confidence in the findings and recommendations.

#### 4.2.3 *Consistency in Gathering and Interpreting Evidence*

The primary evidence gathering method of ILACS relies heavily on the knowledge and skills of the individual inspectors, who work on their own in collecting the evidence and then interpreting and summarising what they found. The essence of the ILACS methodology is the professional opinion of the inspectors. The collective discussions we observed that followed in the team room did help them to think about what they found individually and as a team, offer challenge and temper some opinions, and we did see some opinions change over the inspection period. We did observe, however, variation in the interpretation of what was considered good practice. This issue was raised by a number of the senior local authority managers. Some of them believed different perspectives about the quality of practice in their organisations were taken in the focused visit and the judgement inspection and that this difference in professional opinion was explained as a deterioration in the service in the short time between them. These services could have deteriorated, or Ofsted could have focused on other parts of the service, which could have brought the grade down. Some senior local authority leaders believed this variation to be rooted in individual inspector opinions. The inspectors considered the QA process important to the overall inspection, as was the consistency panel. To our knowledge, however, there was little in the way of a QA process of how the inspectors collect and analyse the information before it is offered to the rest of the team for discussion.

**Recommendation 7:** The system of quality assurance for inspections should be expanded to include closer consideration of inspector's practice. This could only be achieved through regular observation of their work and should feed into a wider reflection on what are effective methods of collecting and analysing information and into personal development plans to ensure the inspectors have the requisite knowledge and skills to evaluate practice.

#### 4.2.4 *Consistency in Applying Evaluation Criteria and Forming a Judgement*

ILACS outlines a set of criteria to meet particular grades. When asked, the inspectors did not disagree with the evaluation criteria. In practice, however, what the criteria meant was open to interpretation. Some believed the criteria for Requires Improvement to be Good, for example, was the hardest to evidence, while some believed it had a very wide span. There was healthy debate and also disagreements within some teams about how to use the framework to come to a collective view on a specific grade in weighing up all of the evidence in light of the evaluation criteria. Some believed all of the criteria were of equal weighting, others that the core business of Help and Protection should hold a greater weight in the overall judgement. This again led to differences of opinion in the teams vis a vis the judgement grades. While for some it was not a difficult task to relate the evidence they had to specific grade descriptors, others struggled to reach agreement, and in one instance we observed a judgement grade was only achieved at the last minute because they had run out of time. These conflicts were managed by the teams in different ways, and always with mutual respect. Some LIs led the teams with greater levels of control over the information and discussion as one method of resolving or even avoiding such conflict. Other LIs operated in ways that allowed the conflict to surface and sought to manage it through dialogue. The QAM role was considered vital by

many inspectors in terms of facilitating discussion and was appreciated when this was done well. The problem here is not the discursive model of decision-making within the ILACS framework, which is basically sound. It is the difficulties of trying to generalise from the evidence and force complex findings into pre-defined categories.

The inspectors undertake a large amount of work and provide important feedback to the senior leaders of an organisation, much of which can be useful for them to improve their service. The overall judgement grades, however, sat uncomfortably with some inspectors, who believed their qualitative feedback was of more value to agencies. Equally, the local authorities did not consider the grades per se as important in terms of improving their service. The only real justification they saw for the issuing of judgement grades was to secure political support and/or funding for the service. Inspection was regarded by agencies as having most value in the qualitative feedback it provides to organisations on how to improve.

**Recommendation 8:** ILACS has attempted to improve grade descriptors, refocusing them away from processes and more towards impact type statements and removing the need for lengthy descriptions of services and the need to say something against each descriptor. However, the evaluation found variation in understanding and use of the judgement grades and criteria. The sampling methodology does not lend itself to wider generalisations and making complex information fit into one of the grade descriptors was often very challenging. While the framework itself and the feedback inspections gave them was regarded as having value, the judgement grades in themselves were not used in a meaningful way by LAs to improve their practice. The judgement grades were seen by LAs as having value in securing political support and funding for the service. However, we observed that the grade Ofsted issues, the perceived meaning of this label, and its potential consequences, resulted in high levels of anxiety for staff at all levels in the LAs. Some inspectors felt that the LAs focused too much on the grade they were given rather than the feedback they provided. LA staff told us that anxieties about the grade – especially that the service could be judged to have declined or be inadequate – contributed hugely to the bureaucratic culture we witnessed within LAs where the emphasis was on what could be demonstrated through audits and what is written down, at the expense of improving the quality of practice through other means. Furthermore, senior leaders believed that receiving a grade that meant the service was judged to have declined or failed could be very damaging and destabilising to services. In the light of these findings, Ofsted should review the value of issuing grades for judgement inspections.

#### *4.2.5 Consistency in Relation to Focused Visits*

We were asked to consider specifically the work of inspectors on focused visits. There were differences in how the teams worked across the focused visits we observed, but these differences existed within teams undertaking judgement inspections too, so we do not see this as an artefact of focused visits. Focused visits were unanimously considered in a more positive light by inspectors and senior LA managers. The level of anxiety was reported to be less than judgement inspections, yet some stressed they still felt as if they were being inspected and that it would be more honest to call them inspections. Time was considered to be sufficient to look at the one area they were focusing on. Indeed, it was commented that focused visits involved two days of evidence gathering for one aspect of the service, while short inspections were essentially three and a half days for the whole service. The difference of having two inspectors on FVs compared to four made little difference in practice in relation to making decisions. It seemed usual in the inspections we observed for one or

two of the inspectors to sometimes be looking at different areas of the service. It was not always the case that all four of the inspectors on judgement inspections looked at the same topic; we sometimes observed one inspector look at the Emergency Duty Team service or two look at the children with disability service, for example. In practice, this was no different to the two inspectors on a focused visit looking at one part of the service together. Where there were conflicts in the evidence base, the inspectors sometimes decided to look at more cases until they came to a shared view. The norm, however, seemed to be that the inspectors considered there to be variation in social work practice and this was accepted by the inspectors and frequently written up in the summaries as 'variable'.

#### 4.2.6 Summary of Answer to Evaluation Question 2

So are Ofsted consistent in their expectations of providers? ILACS provides a clear outline of what inspectors are looking for, for them to reach a judgement about whether the service is 'good'. As we have shown, not all inspectors are clear in practice, however, about how to interpret or use this criteria. There are also differences between inspectors on how they collect information used for the inspection. But most importantly, there are issues around the method of sampling used to come to conclusions about the quality of practice in a service.

## 4.2 Evaluation Question 3

*Are Ofsted prioritising their work where improvement is needed most?*

- *Which aspects of evaluating service quality and impact are given most attention within a short inspection? How does this relate to the evidence on what matters most for children's lives?*
- *How are lines of enquiry developed, explored and, if necessary, closed down efficiently?*
- *What is the basis of a judgement for a short inspection? To what extent does it relate to the previous inspection judgement, and to what extent is new evidence brought to bear?*

#### 4.3.1 Developing, Exploring, and Closing Down Lines of Enquiry

How lines of enquiry were developed, explored and closed down was perhaps the most impressive component of the overall work of the inspectors. This was a complex process of analysing large amounts of information, identifying issues, and making plans to collect information related to them. The information was tracked, collated, and evaluated. Where the information identified an issue, the team made plans to explore the issue further until they felt confident enough about what they had found to discuss it with the senior leaders of the organisation. If the teams believed the information suggested good practice by the organisation, they decided that was enough and they moved their attention to another line of enquiry. The links made between the quantitative data such as performance data and the selection of qualitative data. Some of the quantitative data was not used, however, as some LIs believed there was too much of it or it did not relate to what they needed to look at.

#### 4.3.2 Short Inspections

On short inspections, inspectors are on site for a week, as opposed to two weeks on standard inspections. A crucial difference is that Ofsted enter short inspections under the assumption that the local authority is good, based on their last inspection and / or focused visit. The ILACS framework sets

out that Ofsted are looking to test how the local authority knows it is good. An important tenet of ILACS is the idea that it is a system rather than a single inspection. ILACS seeks to recognise that doing things outside of the onsite inspection (annual engagement meeting, self-evaluation etc) helps Ofsted to do inspection better, and allows for more 'proportionality' in that it does not put a local authority judged as 'good' through another full inspection if this is not deemed necessary.

The inspectors we shadowed and spoke to generally considered short inspections to be more intense, more stressful, and more difficult than focused visits and standard inspections. This related mainly to the lack of time the team had to collect evidence. The short inspections we shadowed were the first some of the inspection teams had done, so the fact that this was a new process in a new framework and the early stage of implementation needs to be taken into account. We did not see much difference between the standards and the short inspections in terms of what was collected in week zero. The LIs engaged with the data they were provided with, analysed this as best they could and drew up initial lines of enquiry. There was no obvious sign that these lines of enquiry were shorter or different to the lines of enquiry drawn up for standard inspections. Given the reduced time, however, the LIs were aware that they would have to focus on the lines of enquiry that they considered most important and then see how much time they had after they had looked at those. In that sense, the LIs of short inspections had to make some choices that the LIs of standard inspections didn't. Comparing short and standard inspections we could see that the inspectors on the standard inspections would be more likely to engage in activity outside of the core ILACS method of looking at cases, such as observing meetings or group supervision sessions. Equally, the allocated time for case sampling with social workers in a specific team was greater on standard inspections. It was not that the short inspections spent less time, it was that they moved across teams quicker and their focus was on testing how the LA knows it is good.

The reduction in time to do this job was clearly seen in the difference between the sample sizes, which for short inspections was sometimes less than 5 cases. Thus, conclusions were being made on smaller sample sizes on short inspections than on standard inspections. Some of the inspectors were aware of the difficulties in making generalisations from such small numbers and this was a conversation among all of the teams we observed undertaking short inspections. This led some to be tentative in their findings or to even remove some findings due to inconclusive evidence. We did observe the teams undertaking short inspections to run out of time to explore all their initial lines of enquiry, and identify potential issues but not have the time to investigate further.

Much of the anxiety experienced on short inspections related to the belief that they needed to collect so much evidence, in so little time, that covers such a large span of service delivery. The prevailing sentiment towards them among a number of inspectors was that they were 'untenable', given similar conclusions are being drawn from a smaller evidence base than in standard inspections. A great deal depended upon the evidence emerging from the inspection. If it was confirming that the LA was still good, or better, there was less anxiety, but when it appeared that the LA had declined and were no longer good the short inspection was particularly pressurised and stressful. The general feeling about shorts within the workforce was such that even some inspectors who had not yet done them regarded them negatively. While inspectors could understand the theory behind short inspections, in practice they were seen to not give sufficient time to do justice to the work that is needed to undertake a judgement inspection. We recognise that it is early days in the implementation of ILACS and these anxieties may reduce when the workforce is more familiar with conducting short inspections. Senior LA managers we interviewed also questioned whether short inspections gave Ofsted the time to gather the evidence on which to base the final decision.

Inspectors were concerned that there isn't enough time to establish relationships and to think and the absence of the weekend that bridges a two week standard inspection was particularly strongly felt.

**Recommendation 9:** Short inspections were a source of significant anxiety in the HMI workforce and among local authority staff in terms of confidence in their findings. The main source of concern was that one week may not provide sufficient time to undertake what is required and this is clearly something that Ofsted needs to monitor very carefully. New approaches can take time to embed and short inspections were the least familiar to the inspectors in our evaluation, so this experience and perception may change over time. Anxiety particularly surrounded when there is evidence that suggests a service has deteriorated and no longer appears to be Good. While we recognise the planning complexities it would give rise to, building into ILACS a degree of flexibility which provides the option of extending the one week of short inspections into a longer inspection of up to two weeks would appear to have merit. Providing inspectors with time for thinking and making sense of data, experiences and findings is crucial here.

#### 4.3.3 *Leadership and Management*

Leadership and management are given a high significance within ILACS. Under the SIF a lot of time was spent in meetings with senior staff obtaining information about plans and strategy. The intention of ILACS is that inspectors only have the meetings they feel they need to with managers and partners and instead spend more time with social workers to explore the experience of and quality of practice with children and families. Some senior LA staff told us they felt that ILACS had moved too far away from active involvement of managers and partner agencies in trying to gain a deeper understanding of wider organisational issues and partnership working. Our observations ascertained that inspectors – and the lead inspector in particular - spend quite a lot of time engaging with senior managers: The LI and one other team inspector met with leaders every morning to feed back their findings from the previous day and often had other meetings with the leadership during the day to discuss matters arising. Senior managers from within the LA and sometimes other agencies were brought together to meet with inspectors as part of pursuing lines of enquiry that gave cause for concern. Inspectors talked to operational staff - especially team managers – while in their teams discussing practice, but little or no attempts were made to observe management in practice, for instance how staff are supported. Establishing how well leaders know their service is a very significant aspect of the ILACS framework, as Ofsted expect senior managers to create the conditions that enable their staff to practise effectively. We saw many instances of inspectors holding managers to account. In examining organisational and performance data, case audits, casefiles, and in discussions with practitioners, inspectors looked hard for evidence that managers signed off case discussions and decisions and that they were thinking strategically about their workforce and service. Evidence of what we often heard inspectors call the 'management footprint' was sought in things such as the size of caseloads, availability of staff training, and the frequency of supervision. The self-evaluation LA's provide under ILACS prior to being inspected, although voluntary under the framework, we found was treated as an important tool in this process. Inspectors hoped and expected the self-evaluation to give an honest, open appraisal of how well or otherwise managers felt their service was performing. They wanted to be told about any areas of under-performance rather than discover that the organisation was trying to hide it, or did not even know about it. The more that the leadership's view of organisational performance accorded with what Ofsted found the better senior managers were regarded as knowing their service. In the very

focused attention they gave to organisational support, culture and issues such as ensuring staff had manageable caseloads, inspectors regarded themselves as representing the best interests of social workers and as guardians of good practice for children and families. All of the 17 inspectors we shadowed and interviewed had extensive experience of social work practice and senior management and all of them strongly identified with the social work profession, as these quotes from three of them illustrate:

‘Even though I’m an Inspector I’m still a social worker. Before joining Ofsted I thought hard about would it mean leaving social work and over the years I’d heard all the jokes about “moving to the dark side”, but I’m not moving away from social work, I’m just taking a different management view of it and a national view.’ ‘I think my social work identity is the core of what I do as an Inspector and without it you cannot do the job with integrity.’

‘I still have the bug, I have the hunger for it, I try through my inspection activity to help. I concluded I could have more influence in Ofsted, so yes I do still regard myself as a social worker.’

**Recommendation 10:** The concerted effort Ofsted gives to attempting to ensure social workers are led and managed in ways that mean they have manageable caseloads and other working conditions and staff development opportunities that maximise their capacity to help and protect children and families requires recognition. We believe that the positive impact of these efforts could be even greater if other recommendations we are making are implemented. This would include reducing the fear and anxiety associated with the issuing of grades (see recommendation 8), changing the powerful assumption that what is most important to Ofsted is what is written down (see recommendation 3), using observations of practice to refocus onto social workers’ lived experiences and what they do in conducting the work (recommendation 4), and introducing a systematic approach to gaining the views of children and families who are involved in all aspects of service provision (recommendation 1). Because they now spend a lot of time with social workers, inspectors are able to gain a feel for the organisation and its management style and culture. Having recommended above that inspectors need to observe social workers in practice, we make a similar recommendation regarding management. While they witness some interactions between managers and their staff, there is merit in inspectors devoting at least some focused time to getting close to how managers actually manage, for instance by observing them conducting activities such as live supervision / debriefs of practitioners following their encounters with service users. This could be done by inspectors, having accompanied social workers to see service users, staying with them on their return to the office to observe how managers interact with and support and enable the practitioner to think about how they related to the child and family. Similar close attention to the support offered to operational managers would provide even greater insight into the practical impact of leadership and senior management.

#### 4.3.4 *The Emotional Experience of Inspections and their Impact*

Observing inspections and talking to those involved enabled us to experience first-hand how they trigger intense feelings of anxiety and fear. Everyone knows that the stakes are very high for local authorities and individual careers and people’s well-being. As one local authority leader epitomised

it, referring to the grade: *'the stress level for people in the service around a label is shocking.'* In general, inspectors were good at putting people at ease and feeding back their findings and very respectful of the local authority staff they were speaking to. Yet there were occasions when the high challenges they offered were done insensitively and some local authority staff were left feeling humiliated and upset. Some of this could have been avoided had the encounter not happened in public in the middle of large open-plan offices in full view of other local authority staff. Some senior LA leaders spoke vividly of the emotional trauma of an outcome where the service was judged to have declined and the corrosive effect it had on the entire workforce. Inspectors are very aware that judgements of anything less than 'good' are generally a big disappointment and an 'inadequate' - even for one aspect of the service, and especially perhaps if it is leadership and management - is devastating.

Thus the emotional demands of inspections are great, not only on agencies but also on inspectors and the impact of this requires careful thought. Because the stakes are so high, and inspection is an intense, anxiety provoking experience, inspectors have to deal with both their own emotions and those of the local authority and have to help them manage them. Fears of feeling shame and humiliation abound (Gibson, 2016; 2019). We were struck by the skill and professionalism with which this emotion-management was generally carried out. On the one hand, Ofsted's commitment to information based on evidence of the completion of tasks, following of procedures and hearing from social workers while reading their computer screens is entirely rational and consistent with what a regulator should be looking at. However, drawing on psychoanalytically informed theory, we would suggest that there could also be an irrational basis to it in how at a deeper level it constitutes an organisational defence against anxiety (Armstrong and Rustin, 2015). Research has shown that a concerted focus on identifiable tasks is a mostly unconscious way of managing anxiety and uncertainty in a risk laden work environment. This connects to some of the rationales for not observing social workers in practice that we found, which can be seen as a psychological coping mechanism in an emotionally intense situation. Moving away from that requires recognition that there are limits to the amount of complexity and anxiety individuals – professionals included - are able to bear (Ferguson, 2018). The way that ILACS has further embedded group discussion and team reflection in action at the heart of its methodology is valuable. The more containment of the intense feelings the work provokes is provided through self-aware peer support and supervision the better able inspectors will be to think clearly and critically get close to practice and lived experience, and make sense of practice quality (Copper and Lees, 2015). To an extent the QAM role does this, but it only comes near the end of the inspection and it needs to be fully oriented to emotional experience as well as practical tasks.

**Recommendation 11:** Inspectors need to receive reflective supervision that focuses on the feelings they are experiencing during the inspection and the emotional impact of inspection work on them. This can support their capacity to think and get as close as possible to social care practice and management and achieve the kind of reflection in action that gives close attention to the practical and emotional experiences of service providers and service users, providing deep understandings of the quality of practice and management and their impact.

#### 4.3.5 Summary of Answer to Evaluation Question 3

So are Ofsted prioritising their work where improvement is needed most? From the perspective of the inspectors, the fact an organisation received a judgement of 'good' in their last judgement inspection is not always a good indicator of the need to reduce the resources for the next judgement

inspection. The on-going system of intelligence gathering that Ofsted now undertake through ILACS means that where they have significant concerns a standard inspection can be scheduled. The inspectors informed us that they are well aware of how quickly a service can deteriorate given certain contextual circumstances. Some doubted that short inspections provide adequate evidence for a change in judgement, and yet we did observe this occurring. From the data we gathered, the short inspections were a more difficult judgement decision than the standard inspections, especially when deterioration in the service became apparent, due to the more limited time and evidence base that short inspections have to rely on. The relative lack of time available to complete short inspections increased anxiety levels and the strategic development of more reflective, analytical ways of managing the emotional demands of inspections is in the interests of all concerned. Finding ways of minimising the painful effects of judgements on local authorities, preventing feelings of blame and humiliation and helping them to deal with the consequences are clearly vital. In this regard, for ILACS to achieve its aim in the longer-term of creating a system of inspection, at the heart of which is Ofsted working with local authorities to see practice improve, would be highly commendable and welcomed by all.

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## Appendix 3: Inspection of local authority children's services framework: University of Birmingham recommendations to Ofsted and Ofsted's response

Academics at the University of Birmingham completed part of this review (see their report in [Appendix 2](#)).

In this section, we detail the recommendations given in that report and our actions and responses to them.

**Recommendation 1:** Ofsted should ensure that the requirement to gain the views of children and families as outlined in the ILACS framework is implemented. The framework itself is basically sound in this regard, but is not being implemented effectively in practice. Ofsted needs to introduce a systematic approach to gaining the views of children and families who are involved in all aspects of service provision: Early Help; Help and Protection; Looked After Children and Care Leavers. This means a focus on gathering direct testimony from a sample of children and also parents/other carers. Some inspectors had much more understanding of the value and need to incorporate the perspectives of the child and family into their inspection activity than others and some had reservations due to ethical concerns. Ofsted need to clarify what is expected of inspectors in gaining service user feedback and provide the necessary information and training. To ensure that seeking the views of those involved in the cases inspectors look at is done ethically, Ofsted need to provide children and families with information about the process, what is being asked of them, what Ofsted will do with the information, and what safeguards are in place if they do disclose information that gives rise to concerns. Standardised information sheets and consent forms should be developed by Ofsted. This will ensure that family members can provide informed consent to giving information, that expectations about the process are clear, and the children are protected from any potential harm that could arise from undertaking such a task. Inspectors should work alongside the children and family social worker and/or family support staff to ensure the child's well-being is monitored following their contact with the inspection.'

**Ofsted's response:** The ILACS framework explicitly takes a more varied approach to gathering the views of children and young people than the SIF. Our inspectors should be aiming to hear the views of children and young people through individual's case notes as well as, where appropriate, talking to them directly. Our inspectors use a variety of methods not only to hear the views of children and young people but to establish how the LA is listening and responding to their needs and views.

We acknowledge that incorporating other ways, beyond direct testimony, to hear the views of children and young people has been challenging for some of our inspectors during the first year of inspecting under the ILACS framework. Using the findings of our internal review, we are working with HMI and their line managers to ensure that the methodologies are fully implemented. We aim to reassure them that their insight and evidence to date are in line with the framework.

Additionally, in response to this recommendation we have:

- raised this issue with a range of sector representative groups, which have expressed satisfaction with our current approach; a number of sector leaders have expressed concern that seeking direct testimony can be tokenistic and may in fact not be in the best interests of the children inspectors may wish to speak to
- begun to explore social media communication with children; many LAs already use this.

Inspectors provide standardised information sheets to any child, young person or family that we ask to speak to directly. Examples of these are [published with the ILACS framework](#). These sheets are to help children and their families understand what their involvement in the inspection means before they agree to talk to an inspector. Inspectors manage this through the LA. They check whether social workers have concerns about the effect on the child of speaking to an inspector. Our arrangements for this were reviewed and changed in advance of GDPR, which came into force shortly after the start of ILACS.

**‘Recommendation 2:** Ofsted needs to set clear expectations about the amount of remote sampling that is acceptable and the optimal time inspectors need to spend looking at individual cases in person with social workers to ensure the depth of data and understandings of practice are established. Ofsted and Lead Inspectors need to ensure sufficient time is allocated for inspectors to be able to achieve the depth of understanding required and inspectors’ practice needs to be monitored during the inspection (see also 4.2.3 below, re staff development and quality assuring of inspectors’ work). This applies to when inspections are pursuing particular lines of enquiry and to when cases are explored in their entirety to seek understanding of the social work practice with respect to relationships with children, parents, case / care planning, thresholds, inter-agency working, case recording, management oversight, supervision and so on.’

**Ofsted’s response:** We rely on our inspectors to apply their professional judgement to select and sufficiently explore specific cases. Depending on the line of enquiry being explored, it is acceptable for inspectors to spend differing amounts of time looking at different cases. However, we do expect our inspectors to gather a consistent depth of information about each case. To ensure this consistency and to support inspectors, we have increased the level of management oversight given during inspection. Our newly appointed lead for quality assurance will continue to monitor and develop this process.

We will also work with our inspectors to ensure that they are exercising the authority that we have as an inspectorate to explore and discuss specific cases. We should not be turning to remote sampling due to a social worker not being present in a building, but instead asking to speak to a supervisor or manager who can give the necessary insights to that specific case.

**‘Recommendation 3:** Two kinds of data are at the heart of the ILACS methodology: what is written down, especially on case files, and what inspectors hear about and see of practice. Fully meeting the

aims of ILACS to enable inspectors to gain understanding of children's experience and the quality of the social work service by focusing more directly on their experience and practice is being prevented by too much emphasis being placed on gathering evidence from administrative processes and what is written down on case files. There is a powerful assumption within local authorities that Ofsted are primarily interested in what is written down. Ofsted needs to conduct an internal review with inspectors and with the entire sector about the minimum requirements for case recording and other administration. What is regarded as legitimate evidence about the quality of practice needs to be rebalanced by moving the emphasis away from the written word to focus more on what is learned about practice from discussion with professionals and service users and observations of practice.'

**Ofsted's response:** We are clear that there is no expectation around the amount of information needed in case files. It is not our role to place minimum requirements on LAs, nor should it be, because the LA should make a judgement based on their own strategy and the nature of their cases.

We expect there to be good systems in place for monitoring and reviewing cases. The ILACS framework is explicitly aimed at evaluating LA oversight of this process rather than directly overseeing it as an inspectorate. We will, however, continue to work with inspectors to ensure that relationships and the impact on children stay of paramount importance through any review of case files. In July 2019, we published a blog about [what makes an effective case record](#).

**'Recommendation 4:** The aim of ILACS to get close to practice with children and families is welcomed within and outside of Ofsted. The dominant methodology of looking at performance data and casefiles, with or without social workers present, provides some important insights about practice and the organisation. It cannot however provide the whole picture. A majority of the people we interviewed from outside of Ofsted believed inspectors should be observing practice and doing so in a systematic fashion. ILACS needs to include observations of social work practice with service users as part of the core methodology for inspections. Direct observation of social workers in practice under ILACS can be achieved in at least three ways: 1. having at least one inspector designated as the practice-observer on each inspection; 2. all the inspectors doing at least one day of it; 3. more radically, having an inspector linked to specific local authorities undertaking observations of practice on an ongoing basis throughout the year as part of the system of inspection initiated by ILACS. We recognise that inspections have to be carried out with limited time and resources, meaning the challenge is to capture enough of the 'right' evidence with the resources available. Ofsted need to do more to ensure that practice observation is routinely happening in local authorities and evaluating the effect of this and the evidence from it. A more effective use of scarce resources by Ofsted would be to devote at least a quarter of the time spent on short and standard inspections to observations of practice, meaning that at least one inspector would be doing this for the duration of the evidence gathering. The social workers and cases to be shadowed could be selected by aligning them with lines of enquiry and the cases looked at in the office. A sub-sample of the casework discussed with social workers in the office could be selected for shadowing and the children and parents in the same cases interviewed as part of the inspection, thereby also helping to meet the requirements of ILACS to take account of service user's experiences. Triangulation of the data from this range of sources – casefiles, audits, performance data, interviews with social workers and managers, observations of practice and interviews with children, parents/ other carers - would provide rich case studies and evidence that gets as close to practice and the quality of the service and children's experience as it is possible to get. Observation is an acquired skill and Ofsted could usefully establish a group of inspectors who develop expertise in the observer role. Our experience is that the more observations

are carried out in an office and across a local authority and are known to be conducted in sympathetic, reflective ways, the more trust develops among those being observed and the anxieties associated with being observed decline. This is why so many social workers report valuing the learning opportunities that come with being observed. Some inspectors are concerned that implementing ILACS is repetitive and deskilling, and doing direct observations of practice would bring more life and variety into the work and assist with staff retention.'

**Ofsted's response:** Our inspectors want to understand how LAs are using observations and shadowing to support employee development and to assure themselves of good practice. It is important that we see that this work is being carried out and positively influencing practice. As part of increased management oversight (see response to recommendation 2), we will ensure that our inspectors provide the right level of scrutiny of management practice in this respect.

We would need to dedicate a large amount of inspector time to observing practice to form a useful part of inspection evidence. We need to ensure that our inspections gather sufficient breadth and depth of evidence so that findings represent the full range of help, protection and care that the LA provides. There will also be variations in what inspectors need to observe to address the specific lines of enquiry of that inspection. We could not therefore support a rigid approach to the amount of observation that inspectors are required to do. This kind of approach would require a significant increase in inspection time. It would increase the burden of inspection on LAs and is not achievable within our current budget.

As an inspectorate, we only have the powers to inspect LAs. To link an inspector to regularly and directly observe practice throughout the year would change our statutory role. It would require either a change in legislation or the requirement to publish a report following every observation on every practitioner. This is not something that we feel is practicably possible or desirable in relation to Ofsted's strategy. We are an inspectorate, not a performance manager.

**'Recommendation 5:** Research and practice evidence shows that the overwhelming context for the majority of families in contact with children's services is an experience of poverty, migration, austerity, deprivation and so on. While LA staff make this context clear and inspectors appear to be sensitive to it, the impact of this context on a service should be much more clearly defined and outlined for all focused visits and judgement inspections. It needs to be much clearer how such contextual factors are meant to play a practical role in the analysis and grading of the service. How this context relates to the quality of practice should be clearly analysed and the ways it was taken into account in reaching a judgement about the quality of the service need to be fully explained. The impact of the intention of the inspection framework to operate from a national standard of 'good' and expect local authorities to address the challenges of how they achieve it needs to be reviewed.'

**Ofsted's response:** We know that LAs have been hit by budget reductions – some of the most significant across the public sector. They are having to make difficult decisions about how to prioritise scarce resources. In some LAs, these pressures have impacted on the quality of children's social care services.

There is no escaping the fact that LAs, social workers and other frontline staff are having to work in very challenging environments. They're supporting larger numbers of families whose lives have been shaped by an inequality of experience and an inability to access the very basics for successful daily living. Poor housing, mental ill health, substance misuse and domestic abuse continue to feature in most referrals to children's social care.

It is for others to comment on this wider context. We can only speak from the evidence that we find. The ILACS framework makes it clear that resource and demand issues – like overly high caseloads or unrealistic expectations of the amount and range of work managers can safely oversee – are stopping social workers from working effectively. We acknowledge those LAs that are investing in children's social care in the face of stark financial choices. We also use our voice to highlight the pressing challenges faced by LAs across England.

Despite this context, all vulnerable children deserve the same good help, protection and care service, regardless of where they live. The bar for good judgements must relate to practice, not context. That's the right thing for children.

**'Recommendation 6:** Ofsted sample cases on the basis of those that demonstrate something to them, as determined by lines of enquiry. There is also a great deal of sampling that is random and done on the basis of convenience, in terms of what managers and practitioners happen to be present in the office. Ofsted need to implement a more rigorous, systematic approach to selecting the cases for inspections. While some cases are selected in advance as part of following up lines of enquiry, many more are selected randomly and due to their convenience. A more rigorous, systematic approach would involve enabling inspectors to sample in purposeful ways where case selection is clarified according to standardised criteria that in addition to identified lines of enquiry are sensitive to: practitioner specific issues (length of experience, gender, ethnicity, team, supervisor etc) and case specific issues (the nature of risk and harm; length of involvement with the local authority and types of relationships; children's and family experiences). HMI need to exercise the authority their powers give to them to use as an inspectorate. This means that if HMI find a case they wish to explore further the LA should provide someone for that discussion even if the social worker or team manager are unavailable. Greater confidence in the breadth and depth of the issues identified by inspection teams could be achieved by a more systematic approach to case sampling. The feedback and final report should clearly outline the nature of the sample looked at, the size, and variation within the sample. This should include being clear that Ofsted's findings are related to what they see and cannot be taken to apply to all cases. Inspectors could benefit from training that enables them to build rationales for inclusion and how representative the sample is. Great transparency about the limitations and strengths of the samples will both provide for more rigorous sampling and boost confidence in the findings and recommendations.'

**Ofsted's response:** As stated in the response to recommendation 2, we will work with our inspectors to ensure that they are exercising the authority we have as an inspectorate to explore and discuss specific cases. We should not be turning to remote sampling or excluding cases due to a social worker not being present in a building, but instead asking to speak to a supervisor or manager who can give the necessary insights to that specific case.

**‘Recommendation 7:** The system of quality assurance for inspections should be expanded to include closer consideration of inspector’s practice. This could only be achieved through regular observation of their work and should feed into a wider reflection on what are effective methods of collecting and analysing information and into personal development plans to ensure the inspectors have the requisite knowledge and skills to evaluate practice.’

**Ofsted’s response:** We expect our inspectors to follow the framework and to be consistent in their practice. In response to the differences observed among team and lead inspectors, we will implement a greater level of management oversight, including providing more support for less experienced lead inspectors and inspection teams.

We will also reinforce the central importance of the role of the lead inspector to assure the quality of the inspection.

**‘Recommendation 8:** ILACS has attempted to improve grade descriptors, refocusing them away from processes and more towards impact type statements and removing the need for lengthy descriptions of services and the need to say something against each descriptor. However, the evaluation found variation in understanding and use of the judgement grades and criteria. The sampling methodology does not lend itself to wider generalisations and making complex information fit into one of the grade descriptors was often very challenging. While the framework itself and the feedback inspections gave them was regarded as having value, the judgement grades in themselves were not used in a meaningful way by LAs to improve their practice. The judgement grades were seen by LAs as having value in securing political support and funding for the service. However, the grade Ofsted issues, the perceived meaning of this label, and its potential consequences, resulted in high levels of anxiety for staff we observed at all levels in the LAs. Some inspectors felt that the LAs focused too much on the grade they were given rather than the feedback they provided. LA staff told us that anxieties about the grade – especially that the service could be judged to have declined or be inadequate – contributed hugely to the bureaucratic culture we witnessed within LAs where the emphasis was on what could be demonstrated through audits and what is written down, at the expense of improving the quality of practice through other means. Furthermore, senior leaders believed that receiving a grade that meant the service was judged to have declined or failed could be very damaging and destabilising to services. In the light of these findings, Ofsted should review the value of issuing grades for judgement inspections.’

**Ofsted’s response:** Ofsted’s grading system is recognised as good practice among inspectorates both nationally and internationally. It provides an objective view of the quality of care that is comparable across different LAs, and it enables the public and government to easily understand the quality of children’s services. The researchers note that LAs recognise grades as being important for securing political and financial support, and that both can be important levers for improvement. They also provide a clear signal to other LAs about the quality of help, protection, care and leadership in an area. This enables good practice to be easily identified and supports learning and improvement nationally.

As the researchers suggest, it is the feedback given during inspection and the subsequent report that LAs find valuable in improving their practice and oversight. We are unsure how the researchers were able to observe anxiety or destabilisation

with their methodology, because they did not revisit any LAs after their shadows and their interviews were immediately after inspection. We recognise that the immediate experience of inspection can be challenging for LA staff at all levels. However, we have seen LAs that, following an inadequate or declined judgement, reflect back on that experience and use it as a real catalyst for change, leading to improvements for their children.

It is vital that Ofsted maintains its focus on the well-being, safety and protection of children as paramount, and does not hold back in reporting objectively for fear of causing concern within LAs.

**‘Recommendation 9:** Short inspections were a source of significant anxiety in the HMI workforce and among local authority staff in terms of confidence in their findings. The main source of concern was that one week may not provide sufficient time to undertake what is required and this is clearly something that Ofsted needs to monitor very carefully. New approaches can take time to embed and short inspections were the least familiar to the inspectors in our evaluation, so this experience and perception may change over time. Anxiety particularly surrounded when there is evidence that suggests a service has deteriorated and no longer appears to be Good. While we recognise the planning complexities it would give rise to, building into ILACS a degree of flexibility which provides the option of extending the one week of short inspections into a longer inspection of up to two weeks would appear to have merit. Providing inspectors with time for thinking and making sense of data, experiences and findings is crucial here.’

**Ofsted’s response:** If the intelligence we hold about an LA suggests a significant deterioration in performance, a short inspection can be changed to a standard inspection. This change in inspection type must happen before the inspection starts.

Our internal review work has identified some anxiety among regional teams and inspectors around short inspections. This is possibly due to it being a new and different process than the SIF. Acknowledging the anxiety felt and the different sizes of LAs we will increase the team size to five inspectors for all inspection types in the largest LAs and decrease the team size to three inspectors in the smallest LAs. There will also be flexibility to increase or decrease team size in other LAs in exceptional circumstances.

**‘Recommendation 10:** The concerted effort Ofsted gives to attempting to ensure social workers are led and managed in ways that mean they have manageable caseloads and other working conditions and staff development opportunities that maximise their capacity to help and protect children and families requires recognition. We believe that the positive impact of these efforts could be even greater if other recommendations we are making are implemented. This would include reducing the fear and anxiety associated with the issuing of grades (see recommendation 8), changing the powerful assumption that what is most important to Ofsted is what is written down (see recommendation 3), using observations of practice to refocus onto social workers’ lived experiences and what they do in conducting the work (recommendation 4), and introducing a systematic approach to gaining the views of children and families who are involved in all aspects of service provision (recommendation 1). Because they now spend a lot of time with social workers inspectors are able to gain a feel for the organisation and its management style and culture. Having recommended above that inspectors need to observe social workers in practice, we make a similar

recommendation regarding management. While they witness some interactions between managers and their staff, there is merit in inspectors devoting at least some focused time to getting close to how managers actually manage, for instance by observing them conducting activities such as live supervision / debriefs of practitioners following their encounters with service users. This could be done by inspectors, having accompanied social workers to see service users, staying with them on their return to the office to observe how managers interact with and support and enable the practitioner to think about how they related to the child and family. Similar close attention to the support offered to operational managers would provide even greater insight into the practical impact of leadership and senior management.'

**Ofsted's response:** As with our response to recommendation 4, we would need to dedicate a large amount of inspector time to observing practice to form a useful part of inspection evidence. We expect our inspectors to explore and evaluate how managers observe and audit practitioners' work and how this feeds into improving practice. We can glean this in a variety of ways, including through conversations with frontline staff during inspections, case audits completed by the LA, through LA's self-evaluations and during annual engagement meetings with LAs. We do not feel we would be making best use of resource if we introduced the observation of leaders and managers to inspections.

**'Recommendation 11:** Inspectors need to receive reflective supervision that focuses on the feelings they are experiencing during the inspection and the emotional impact of inspection work on them. This can support their capacity to think and get as close as possible to social care practice and management and achieve the kind of reflection in action that gives close attention to the practical and emotional experiences of service providers and service users, providing deep understandings of the quality of practice and management and their impact.'

**Ofsted's response:** We recognise that ILACS inspections are emotionally demanding because the cases discussed concern often vulnerable children in difficult circumstances. Nevertheless, our inspectors report that ILACS inspections are no more emotionally demanding than SIF inspections.

We know that any form of inspection can be emotionally demanding; it is unlikely to just relate to ILACS inspections. Ofsted has a duty to support our staff and their well-being. It is important that we give inspectors the time, support and space to talk through what they have seen. We are considering options to increase this support further.



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