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6<sup>th</sup> August 2015

Dear Sir/Madam

### Joint Targeted Area Inspections

With a membership of over 425,000 registered nurses, midwives, health visitors, nursing students, health care assistants and nurse cadets, the Royal College of Nursing (RCN) is the voice of nursing across the UK and the largest professional union of nursing staff in the world. RCN members work in a variety of hospital and community settings in the NHS and the independent sector. The RCN promotes patient and nursing interests on a wide range of issues by working closely with the Government, the UK parliaments and other national and European political institutions, trade unions, professional bodies and voluntary organisations.

Thank you for the opportunity to comment. We have consulted with our members who have welcomed the development of the joint targeted area inspections. However there were mixed responses to the consultation questions as indicated on attached consultation questionnaire where multiple answers are selected to individual questions. This represents a need for further work once the consultation has closed. Given the mixed response from our members we have the following comments to make from a collegiate perspective:

- The joint approach will reinforce the need for joint working at all levels and better assess how local agencies are working in a coordinated manner to protect children and young people
- Inspection fieldwork will focus on children's experiences. Some of our members are however unsure how this will be undertaken and whether the inspection team will be multi-agency and how they would be selected and trained.
- Our members have raised concerns about how the voice of children who may have disabilities and complex needs might be heard in the inspection process.



- There are reservations from some members about the ability to undertake the depth of inspection required within an eight day period. There is a need to pilot the framework and identify whether the timespan is realistic and achievable.
- Our members have reported that many areas undertake case audits at the current time. However the quality is variable and so information will not be consistent.
- While all agencies should hear the findings together at a joint feedback meeting, this should be followed by the opportunity for each local agency to receive feedback from the relevant inspectorate following joint feedback.
- Our members have highlighted the need to enhance awareness of child sexual exploitation through access to training and education. It would appear there is considerable variability in provision across the country.
- The inspection should focus on the quality of intervention following or during the assessment in the short and long term. Our members have highlighted that many children may not meet the threshold for intervention currently but there are concerns for their welfare, while others may receive no services when their case is closed. Our members highlight that restorative services are essential.
- Our members have questioned whether it would be possible to include children at risk of Female Genital Mutilation, trafficked and involved in slavery as well
- The formula for cases should perhaps be based on the local child population rather than the number of cases. So for example county councils generally have much larger child populations than smaller councils therefore to get a fair perspective a formula should be applied.

We hope that you will find our response helpful. Please do not hesitate to make contact should you require further information

Yours sincerely



**Fiona Smith**

RCN Professional Lead for Children and Young People's Nursing



# Consultation questionnaire

Joint targeted area inspections

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This is a joint consultation by:

- Office for Standards in Education Children's Services and Skills (Ofsted)
- The Care Quality Commission (CQC)
- Her Majesty's Inspectorate of Constabulary (HMIC)
- Her Majesty's Inspectorate of Probation (HMI Probation)

This questionnaire provides a summary of our proposals. It should be read alongside the full consultation document, which can be found here:

[www.gov.uk/government/consultations/joint-targeted-area-inspections](http://www.gov.uk/government/consultations/joint-targeted-area-inspections)

We are seeking the widest possible range of views from those who have an interest in, or expertise relating to the protection of children. We particularly want to hear from people who work within local multi-agency arrangements to protect children.

The closing date for the consultation is 11 August 2015

If you would like a version of this document in a different format, such as large print or Braille, please telephone 0300 123 1231 or email [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)



Corporate member of  
Plain English Campaign  
Committed to clearer communication

361

## Responding to this consultation

The consultation will be open until 11 August 2015.

There are three ways of completing and submitting your response:

- Complete the online questionnaire: [www.surveymonkey.com/r/JTAI](http://www.surveymonkey.com/r/JTAI)
- Download this document from: [www.gov.uk/government/consultations/joint-targeted-area-inspections](http://www.gov.uk/government/consultations/joint-targeted-area-inspections) complete it on your computer and email it to [socialcare@ofsted.gov.uk](mailto:socialcare@ofsted.gov.uk) with the consultation name – Joint Targeted Area Inspection – in the subject line
- Print this document, complete it by hand and post it to

Social Care Policy Team  
Ofsted  
Aviation House  
125 Kingsway  
London  
WC2B 6SE

This questionnaire provides a summary of our proposals. It should be read alongside the full consultation document, which can be found here: [www.gov.uk/government/consultations/joint-targeted-area-inspections](http://www.gov.uk/government/consultations/joint-targeted-area-inspections)

## Confidentiality

The information you provide will be held by us. It will only be used for the purposes of consultation and research to help us to become more effective, shape policies and inform inspection practice.

We will treat your identity in confidence if you disclose it to us. However, we may publish an organisation's views.

### Are you responding on behalf of an organisation or as an individual?

Individual response	<input type="checkbox"/>
On behalf of an organisation, please specify Royal College of Nursing	

## Do you work in any of the following areas?

Social care	<input type="checkbox"/>	Education	<input type="checkbox"/>
Health services	<input type="checkbox"/>	Policing	<input type="checkbox"/>
Probation services	<input type="checkbox"/>	Youth offending team	<input type="checkbox"/>
Community rehabilitation company	<input type="checkbox"/>	For a charity	<input type="checkbox"/>
For a voluntary sector organisation	<input type="checkbox"/>	Local safeguarding children board	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>	None of these	
<p>Other (please tell us) The Royal College of Nursing is a membership organisation. With a membership of over 423,000 registered nurses, midwives, health visitors, nursing students, health care assistants and nurse cadets, the Royal College of Nursing (RCN) is the voice of nursing across the UK and the largest professional union of nursing staff in the world. RCN members work in a variety of hospital and community settings in the NHS and the independent sector. The RCN promotes patient and nursing interests on a wide range of issues by working closely with the Government, the UK parliaments and other national and European political institutions, trade unions, professional bodies and voluntary organisations.</p>			

## I am a:

local authority Director of Children's Services	<input type="checkbox"/>	local authority Chief Executive	<input type="checkbox"/>
Local Safeguarding Children Board Chair	<input type="checkbox"/>	Other local authority director or assistant director	<input type="checkbox"/>
practitioner in education	<input type="checkbox"/>	senior manager in education	<input type="checkbox"/>
practitioner in social care	<input type="checkbox"/>	senior manager in social care	<input type="checkbox"/>
General practitioner	<input type="checkbox"/>	other primary care professional	<input type="checkbox"/>
Other practitioner in health	<input type="checkbox"/>	other senior manager in health	<input type="checkbox"/>
Police and Crime Commissioner	<input type="checkbox"/>	Police Officer/staff – Child Protection Specialist role	<input type="checkbox"/>
Police Officer/staff – other	<input type="checkbox"/>	Senior Police Manager	<input type="checkbox"/>
YOT practitioner	<input type="checkbox"/>	YOT manager	<input type="checkbox"/>
CRC practitioner	<input type="checkbox"/>	CRC manager	<input type="checkbox"/>
NPS practitioner	<input type="checkbox"/>	NPS manager	<input type="checkbox"/>
Lawyer	<input type="checkbox"/>	Elected representative	<input type="checkbox"/>
Child or young person	<input type="checkbox"/>	Parent/carer	<input type="checkbox"/>
No / Prefer not to say	<input type="checkbox"/>		
Other (please tell us) Professional Lead for Children and Young People's Nursing			



## The scope of the inspection

See paragraphs 11–14 of the consultation document for full details on this proposal.

### Summary of the proposal

We propose that the joint targeted area inspections will have a tightly defined scope focusing on areas likely to add value for the local partnership. We will evaluate the effectiveness of multi-agency practice to protect children. We also want to include some flexibility within the scope so that we have in place a joint published framework that will allow us to respond, through a 'deep dive' aspect of the inspection, to specific areas of interest or concerns that may arise.

For the period between October 2015 and March 2016, we propose that the deep dive aspect of the inspections is focused on children and young people at risk of sexual exploitation and those missing from home, school or care.

1. Do you agree that the joint targeted area inspections can best help the local partnership to improve by focusing on:
  - the multi-agency response to all forms of abuse and neglect at the point of identification, referral/notification?

Yes	No	Don't know
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- the quality and impact of assessment and decision making in response to referrals?

Yes	No	Don't know
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- the leadership and management of this work and the effectiveness of the local safeguarding children board (LSCB) in these areas?

Yes	No	Don't know
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. Do you agree that the deep dive aspect of inspections between October 2015 and March 2016 should be the experiences of children at risk of sexual exploitation and those missing from home, school or care?

Yes	No	Don't know
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Notice period and duration of fieldwork

See paragraphs 15–16 of the consultation document for full details on this proposal.

### Summary of the proposal

The inspection fieldwork will be contained within one week (Monday to Friday). We propose to notify the local partnership eight working days before the start of the inspection. To reflect the joint nature of the inspection, we propose to contact the chair of the LSCB first. Each inspectorate will contact each agency's senior leader immediately after we notify the chair of the LSCB.

We will ask the local area to undertake a joint audit of a small number of children's cases during the short notice period. The cases will be associated with the deep dive aspect of the inspection.

3. Should the chair of the LSCB be the first person we notify of the inspection?

Yes	No	Don't know
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If you have answered 'No', please tell us who you think we should notify first.

There was a mixed response from members to this question. of those who stated no, they advised the Director of Children's Services should be the first person to be notified
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4. How many children's cases could the local partnership jointly audit in the eight working days before inspectors arrive in the local area?

5 cases or fewer	6 to 10 cases	More than 10 cases	None, it is not possible to jointly audit cases in eight days
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>



## Inspection methodology

See paragraphs 17–22 of the consultation document for full details on this proposal.

### Summary of the proposal

Our experience of joint inspection tells us that setting up the inspection jointly is a vital first step to its smooth operation. We propose to use the short notice period to arrange a joint set-up meeting of all local senior agency leaders on the first day of the inspection. A representative of each of the inspectorates will attend to ensure that all parties have a shared understanding of how we will conduct the inspection

We also think joint feedback is the best way to help the local agencies understand what inspectors have found. We propose a single meeting of the joint inspection team and all local senior leaders on the final day of the inspection. The inspection team will set out the key findings, including strengths and areas for improvement/recommendations that will appear in the report and the evidence that supports the findings

5. Is it feasible (with eight days' notice) to organise a joint set-up meeting on the first day of the inspection that brings together all the inspectorates and all the local service leaders?

<b>Yes, this is achievable with eight days' notice</b>	<b>No, this is not achievable with eight days' notice</b>	<b>Don't know</b>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6. Is a joint feedback meeting that involves all inspectorates and service leaders the best way to help local agencies understand the findings of the inspection or should each local agency meet with the relevant Inspectorate separately so they can focus on their part of the service?

<b>All local agencies should hear the findings together at a joint feedback meeting</b>	<b>Each local agency should receive feedback from the relevant inspectorate separately</b>	<b>Don't know</b>
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

## Reporting the inspection outcome

See paragraphs 23–27 of the consultation document for full details on this proposal.

### Summary of the proposal

We propose to set out our inspection findings in a published letter to the chair of the LSCB and senior agency leaders responsible for the agencies inspected that make up the local partnership. The letter will set out the key strengths and recommendations for the partnership or a particular agency but will not make a graded judgement.

We are interested to hear whether we should present recommendations arising from joint inspections as a single list without any indication of priority or whether it would be more helpful to separate them out into 'areas for priority (or urgent) action' and 'areas for development/improvement'.

An area for priority or urgent action would be an indicator of concern about something the local area must do as opposed to an area for development, which the area can improve on. We think this is the most effective way to indicate concern in a report that does not have graded judgements.

We propose to send the draft report to the chair of the LSCB to co-ordinate a single factual accuracy response on behalf of the local partnership.

7. Should the report list the recommendations without any indication of priority or should it indicate which issues need urgent or priority attention?

Without prioritisation	Indicate which issues need priority/urgent action	Don't know
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

8. Should each agency and the chair of the LSCB be asked to comment on the factual accuracy of the draft report separately or should the chair of the LSCB be asked to coordinate a single joint response?

A single joint response coordinated by the chair of the LSCB	Separate responses from each agency and the chair of the LSCB	Don't know
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Identifying areas of good or best practice

See paragraphs 29–30 of the consultation document for full details on this proposal.

### Summary of the proposal

For each of the inspectorates, the most reliable source of information about practice is their most recent inspection report. We are very interested in your views on what factors we should consider when identifying areas demonstrating good practice we could inspect. This will help our decision making on selecting geographical areas to inspect as part of the programme so that we can share this good practice more widely.

9. Please give us your views on how the inspectorates can identify areas where good or best practice exists.

This is a complex issue, and the inspectorate need to consider very carefully. There should be access to an ongoing LSCB Audit programme and the inspectorate need to consider the expertise they require to hear the voice of children in the context of Child Sexual Exploitation due to the risk of trauma of engagement in the inspection process, and thereby the support young people will require post inspection.

Best practice is particularly challenging as some of the Best Practice is in areas of significant problems in the case of CSE. Suggest that there is engagement with recognised authorities, For Example NWG and Bedford University for Child Sexual Exploitation would be an advisable way of searching out best practice examples and in respect of child sexual abuse organisations such as NSPCC

Inspectorates should ensure they communicate effectively with service providers and frontline clinicians and practitioners and service users to identify areas of best practice. Areas thought to be best good practice should have evidence to support this view from both a qualitative and quantitative perspective. this evidence should include understanding of health, social and educational outcomes in both the long and short term.

Whilst many areas have specialist operations to manage this agenda it is important to understand how universal primary and secondary services work with this issue as well i.e. what preventative work is undertaken, what restorative intervention is available in the longer term for survivors of child sexual abuse/child sexual exploitation.



# Ofsted’s proposals for a single agency inspection

See paragraphs 31–34 of the consultation document for full details on this proposal.

## Summary of the proposal

Ofsted is confident that the scope of the joint targeted area inspections will provide effective assurance about decision making and assessment in child protection and will give the opportunity to look closer into a specific service or the experiences of a specific group of children and young people. Ofsted would therefore like to use the framework to evaluate local authority performance as a single agency exercise.

- 10. Could Ofsted use the joint targeted inspection model to undertake a single agency targeted area inspection of the local authority and LSCB where concerns are identified?

<b>Yes, Ofsted could use the joint inspection model for single agency targeted area inspection</b>	<b>No, Ofsted should use their current full single inspection framework only which is specific to local authorities and LSCBs.</b>	<b>Don't know</b>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 11. If you have any further comments about Ofsted using the joint framework for single agency inspection please tell us what these are:

Essentially this is multiagency work. therefore it is of central importance that any inspection team is multiagency. It is important that the inspection focuses equally on practice, service provision and delivery, as well as the commissioning arrangements in place across all agencies. It is important that there is an independent (Non-Social Work) element to single agency inspection and particularly a Voice of the Child Representation.

## What did you think of this consultation?

Thank you for taking part in our consultation.

Please tell us what you thought of this consultation. Your views will help us to improve our consultations.

12. How did you hear about this consultation?

- from Ofsted
- from CQC
- from HMI Constabulary
- from HMI Probation
- Other (please specify)

	Agree	Neither agree or disagree	Disagree	Don't know
I found the consultation information clear and easy to understand.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I found the consultation easy to find.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
I had enough information about the consultation topic.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I would take part in a future consultation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

13. Is there anything you would like us to improve on or do differently for future consultations? If so, please tell us below.

There is a need to improve the consultation notification and dissemination process, as well as include additional space for comments in any consultation questionnaire. please see our covering letter in this respect as we have encompassed additional feedback in response to the questions posed.

## Additional questions about you

Your answers to the following questions will help us to evaluate how successfully we are gathering views from all sections of society. We would like to assure you that all responses are anonymous and you do not have to answer every question.

Please tick the appropriate box.

### Gender

Female <input type="checkbox"/>	Male <input type="checkbox"/>
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### Age

Under 14 <input type="checkbox"/>	14–18 <input type="checkbox"/>	19–24 <input type="checkbox"/>	25–34 <input type="checkbox"/>	35–44 <input type="checkbox"/>	45–54 <input type="checkbox"/>	55–64 <input type="checkbox"/>	65+ <input type="checkbox"/>
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### Ethnic origin

(a) How would you describe your national group?

- British or mixed British
- English
- Irish
- Northern Irish
- Scottish
- Welsh
- Other (specify if you wish)

(b) How would you describe your ethnic group?

<b>Asian</b>		<b>Mixed ethnic origin</b>	
Bangladeshi	<input type="checkbox"/>	Asian and White	<input type="checkbox"/>
Indian	<input type="checkbox"/>	Black African and White	<input type="checkbox"/>
Pakistani	<input type="checkbox"/>	Black Caribbean and White	<input type="checkbox"/>
Any other Asian background (specify if you wish)	<input type="checkbox"/>	Any other mixed ethnic background (specify if you wish)	<input type="checkbox"/>
<b>Black</b>		<b>White</b>	
African	<input type="checkbox"/>	Any White background (specify if you wish)	<input type="checkbox"/>
Caribbean	<input type="checkbox"/>	<b>Any other ethnic background</b>	
Any other Black background (specify if you wish)	<input type="checkbox"/>	Any other background (specify if you wish)	<input type="checkbox"/>
<b>Chinese</b>			
Any Chinese background (specify if you wish)	<input type="checkbox"/>		

**Sexual orientation**

Heterosexual <input type="checkbox"/>	Lesbian <input type="checkbox"/>	Gay <input type="checkbox"/>	Bisexual <input type="checkbox"/>
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**Religion/belief**

Buddhist	<input type="checkbox"/>	Muslim	<input type="checkbox"/>
Christian	<input type="checkbox"/>	Sikh	<input type="checkbox"/>
Hindu	<input type="checkbox"/>	Any other, please state:	<input type="checkbox"/>
Jewish	<input type="checkbox"/>	None	<input type="checkbox"/>

**Disability**

Do you consider yourself to be disabled?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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