Improving the way Ofsted inspects children's social care

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Your response

Are you responding on behalf of an organisation or a group (eg a children in care council)
Yes (please provide the name of your organisation) The Behaviour Shift Ltd

About you

Please tell us which of these best describes you or your role:
I work in a professional role for one of these organisations: Children's social care sector

About your role

Please tell us in which professional capacity you are completing this survey:
Other professional role (please specify): Founder, The Behaviour Shift Ltd – independent organisation supporting families and children's social care professionals through training, practice development and behaviour support.

How would you like to share your views?

What would you like to do?
Answer the full consultation with detailed questions

Inspecting local authority children's services (ILACS)

Would you like to share your views on our proposals for inspections of local authority children's services (ILACS)?
Yes

ILACS proposals: The content of our inspection frameworks

Our ambition for ILACS inspections What do you think about our proposed statement of ambition for children’s social care inspections in relation to ILACS?
The Behaviour Shift broadly supports the proposed statement of ambition, particularly the emphasis on children’s voices, enduring relationships, inclusive practice and a more joined-up responsibility between local authorities and providers. We believe inspection is most useful when it looks beyond whether systems and processes are in place and considers how those systems are experienced in practice by children and families. A plan may be well written and a service may be compliant, but the quality of the adult response in the moment can still have a significant effect on a child’s experience and outcomes. We particularly welcome the focus on meaningful engagement with children, young people, parents and carers. This should include consideration of whether their views have influenced decisions, rather than simply whether consultation has taken place. We would also encourage Ofsted to retain a strong focus on relational practice across the framework. Enduring relationships are important, but so too is the quality, consistency and language of everyday interactions between children, families and professionals. Inspection should be able to recognise where strong systems are translated into strong human responses in day-to-day practice. Overall, the ambition provides a positive direction. Its impact will depend on how clearly these principles are translated into inspection criteria and how consistently inspectors evaluate what children and families actually experience.

How can ILACS inspections support local authorities to meet the needs of children who have the most complex lives?

ILACS inspections can support local authorities to meet the needs of children with the most complex lives by looking closely at how systems translate into the day-to-day experience of the child, particularly where risk, trauma, exploitation, mental health needs, placement instability or multiple agencies are involved.

Children with complex lives can often experience a large number of professionals, changing plans and repeated assessments. Inspection should therefore consider not only whether appropriate services are involved, but whether those services are working together consistently and whether the child experiences a coherent response.

We would encourage inspectors to look at how professionals understand and respond to behaviour. Behaviour that presents as challenging, resistant or high risk can often be communicating unmet need, fear, trauma or a breakdown in trust. Inspection should explore whether services are able to remain relational, curious and consistent when risk increases, rather than allowing the response to become increasingly procedural or punitive.

Particular attention should also be given to children who experience repeated placement breakdowns, service thresholds or changes of professional. These children are often the ones who most need stability and enduring relationships. Inspection should examine whether the system adapts around the child, or whether the child is repeatedly expected to adapt to the system.

ILACS can also help by identifying where responsibility becomes fragmented between local authorities, health, education, police, providers and families. For children with the most complex lives, strong multi-agency arrangements should be visible not just in meetings and plans, but in the consistency of the response the child actually receives.

Ultimately, inspection should help local authorities understand whether children with the greatest level of need are experiencing safe, consistent and relational support, and whether professionals have the capacity, confidence and support to maintain that approach during periods of increased risk.

How can ILACS inspections encourage providers and local authorities to make sure that children are able to receive the right type of care and support in the right place?

ILACS inspections can encourage providers and local authorities to make sure children receive the right care and support in the right place by looking at the quality of commissioning and placement decisions, not just whether a placement is technically available.

Inspection should consider whether decisions are based on the individual child’s needs, relationships, identity, risks, strengths and existing support networks, rather than being driven mainly by vacancies, cost or service availability. Where children are placed far from home or experience repeated moves, inspectors should look closely at why this has happened and what impact it has had on the child.

Local authorities and providers should also be encouraged to work together earlier, particularly for children whose needs are escalating. Too often, support can become reactive once a placement is already under significant pressure. Inspection should consider whether there is effective planning, information sharing and practical support around the placement before difficulties reach crisis point.

We would also encourage Ofsted to look at how well the child’s voice influences placement and support decisions. Children should not simply be informed where they are going; their views, relationships and sense of safety should meaningfully shape planning wherever possible.

Finally, inspection should consider whether the system is learning from placement breakdowns and repeated moves. Where patterns exist, the focus should not only be on the child’s behaviour, but on what changed in the environment, relationships, support or professional response leading up to the breakdown. This would help move practice away from asking whether a child can fit a placement and towards whether the placement and wider system can meet the child’s needs.

What further changes can be made to ensure ILACS inspections focus on what matters for children?

ILACS inspections should continue to move beyond asking whether processes have been completed and place greater emphasis on what those processes actually feel like for children.

This could include looking more closely at the quality of everyday interactions, whether children experience consistency across different professionals, whether they understand what is happening around them, and whether their relationships with trusted adults are protected when plans or services change.

We would also encourage inspection to consider the language used around children. Different professionals can use different terminology to describe the same behaviour or need, and this can affect how a child is understood and responded to. A stronger focus on shared understanding across agencies could help reduce situations where the same child is being viewed very differently depending on which service is involved. In simple terms, different language can still carry the same meaning.

Inspection should also recognise the pressure services are operating under. High caseloads, workforce shortages, placement pressures and increasingly complex levels of need can all influence the consistency of practice. This should not lower expectations for children, but understanding these pressures can help inspection distinguish between isolated practice issues and wider systemic barriers that require support, investment or different ways of working.

Most importantly, inspection should continue to test whether the response around a child is helping to improve their experience and outcomes. Where behaviour, risk or relationships are becoming more difficult, the question should not only be what the child is doing, but what is happening around them and how adults are responding. Changing the response can change the outcome.

ILACS evaluation areas

What do you think about the proposed changes to ILACS evaluation areas?

The Behaviour Shift supports the proposed changes to the ILACS evaluation areas, particularly the decision to separate Family Help from protection, introduce a specific area on engagement with family networks, and retain distinct evaluation areas for children in care and care leavers.

Separating Family Help from protection should make it easier to recognise the value of effective early support in its own right, rather than viewing it mainly through the point at which risk has escalated. This creates a stronger opportunity to look at whether families receive coordinated help early enough, whether relationships are being strengthened and whether professionals are working with families rather than simply around them.

We also welcome the proposed focus on family networks. Children's relationships with parents, relatives, friends and other trusted adults can be central to their identity, stability and sense of belonging. Inspection should consider not only whether family networks have been identified, but how meaningfully they have been involved and whether support is available to help those relationships remain safe and sustainable.

The three proposed cross-cutting themes — engagement with children and families, enduring relationships and multi-agency working — are particularly important. We would encourage Ofsted to ensure these are visible in day-to-day practice, not only in plans, meetings and recorded evidence. A child can experience several services that are individually doing the right things, but still receive an inconsistent overall response if professionals use different language, thresholds or interpretations of the same need. Different language can still carry the same meaning, and inspection has an opportunity to test whether agencies are reaching a genuinely shared understanding of the child.

We would also encourage the 'impact of leaders' evaluation area to retain a strong focus on workforce conditions and the support available to practitioners. The sector is operating under significant pressure, including workforce instability, high levels of complexity and placement pressures. Recognising this context should not reduce expectations for children, but it can help identify whether leaders are creating the conditions in which staff can deliver consistent, relational and thoughtful practice.

Overall, the proposed structure appears capable of giving a more accurate picture of how local authority services affect children and families, provided that the eventual evaluation criteria continue to test the quality of the response children actually experience rather than primarily the existence of systems and processes.

What do you think about our proposal that inspection activity on sufficiency and use of unregistered provision should sit within the ‘impact of leaders’ judgement in ILACS?

We support the proposal to place sufficiency and the use of unregistered provision within the ‘impact of leaders’ judgement. Both issues are fundamentally linked to strategic planning, commissioning, workforce capacity and the ability of a local authority to understand and respond to the needs of its children over time.

Sufficiency should not be understood simply as whether there are enough placements available. The key question is whether there is enough suitable provision, in the right places, with the right level of support, for the children who actually need it. Ofsted itself has recognised that the issue is shaped by a complex range of factors and is not simply about the overall volume of provision.

Placing this within the impact of leaders judgement also creates an opportunity to look at whether leaders are identifying emerging needs early enough and working with providers before the system reaches crisis point. Where sufficiency is weak, frontline practitioners and providers can be left managing extremely difficult situations with limited options. Inspection should therefore consider both the decisions being made at leadership level and the pressures those decisions create further down the system.

We would also encourage inspection to look at the relationship between sufficiency and placement stability. Where the right placement is not available, children may experience moves, distance from important relationships or placements that are not fully matched to their needs. Those experiences can then affect behaviour, trust and risk, which can in turn place further pressure on the placement and wider system.

For that reason, sufficiency should be seen not only as a commissioning issue, but as something that directly affects the quality of the response a child receives. Strong leadership in this area should help create the conditions in which children can experience safe, stable and relational care rather than repeated responses to crisis.

What do you think about our proposal to make the use of unregistered provision a limiting criterion on ILACS inspections?

We understand and support the principle of making the use of unregistered provision a limiting criterion. Children should be cared for in provision that is lawful, appropriately regulated and subject to proper oversight, and the use of unregistered provision should remain an exceptional and unacceptable position rather than becoming normalised.

However, we would encourage Ofsted to continue considering the circumstances that have led to its use. In some cases, unregistered provision may reflect wider sufficiency pressures, particularly where local authorities are trying to find suitable placements for children with highly complex needs and no appropriate regulated provision is available.

This does not make the use of unregistered provision acceptable, but inspection should distinguish between poor strategic planning or avoidable decision-making and situations where leaders are responding to significant system-wide shortages while actively working to secure a lawful alternative.

Inspection should therefore look closely at what steps were taken before the placement was made, how risks were assessed and managed, how quickly leaders acted to move the child into suitable registered provision, and whether learning from the situation is informing future commissioning and sufficiency planning.

We would also encourage Ofsted to consider the experience of the child throughout this process. A placement being technically available does not necessarily mean it is suitable. Children with the most complex needs should not be moved repeatedly between unsuitable settings simply in order to achieve technical compliance. The goal should remain lawful, safe and stable care that can genuinely meet the child’s needs.

A limiting criterion can therefore provide an important safeguard, provided it is applied with enough contextual understanding to recognise both leadership responsibility and the significant pressures currently affecting placement sufficiency across the sector.

What do you think about our proposal to change how inspectors look at sufficiency as part of an ILACS inspection?

We support a broader and more comprehensive approach to inspecting sufficiency. Sufficiency should not be understood only as the number of placements available; it should consider whether the wider system is able to respond to children and families early enough, provide the right support at the right time and reduce avoidable escalation into crisis.

We particularly welcome the inclusion of services that prevent the need for care, support for family networks and kinship carers, and workforce recruitment, retention and development. These areas are closely connected. Where families receive effective support earlier, where trusted relationships are strengthened and where practitioners have the capacity and confidence to work consistently with children and families, there is a greater opportunity to prevent breakdown and instability.

Inspection should also consider whether sufficiency planning reflects the actual needs of children locally, including those whose lives are more complex. It is not enough to have placements available if they cannot safely and sustainably meet the needs of the children requiring them. Commissioners and providers need a shared understanding of local need, and inspection can help test whether that understanding is translating into the right provision.

Workforce sufficiency should remain an important part of this. A system can have strong policies and commissioning arrangements, but if frontline services are operating under sustained staffing pressure, high turnover or limited access to skilled and experienced practitioners, the quality and consistency of the response children receive can be affected.

We would also encourage Ofsted to look at sufficiency dynamically rather than only at a single point in time. Inspection should consider whether leaders are identifying emerging pressures early, learning from placement breakdowns, responding to patterns in demand and working constructively with providers and neighbouring authorities before shortages become crises.

Overall, this broader approach is welcome because it recognises that sufficiency is not simply about capacity. It is about whether the whole system has enough of the right support, relationships, workforce and provision to meet children’s needs in a stable and sustainable way.

ILACS proposals: How we grade

Secure fit

What do you think about our proposal to introduce the ‘secure fit’ grading methodology for ILACS inspections?

The Behaviour Shift supports the principle of a secure fit approach if it leads to greater consistency and transparency in how inspection judgements are reached.

Requiring the full set of criteria for a grade to be met should help make expectations clearer for local authorities and reduce the risk of strong performance in one area masking significant weaknesses in another. Ofsted’s stated intention is that this approach should improve consistency and make it clearer what needs to improve.

However, children’s social care is complex and rarely fits neatly into isolated categories. We would therefore encourage Ofsted to retain enough professional judgement to recognise context, trajectory and the difference between an isolated weakness and a more systemic problem.

This is particularly important in a sector operating under significant pressure. Workforce instability, increasing complexity of need, placement shortages and multi-agency pressures can affect practice in different ways across a local authority. A secure-fit model should create clarity without becoming so rigid that it loses sight of the reasons behind what inspectors are seeing.

Inspection should also continue to look beyond whether criteria are technically met and consider the quality of the response children and families actually experience. Strong systems matter, but their value is ultimately seen in how consistently they translate into safe, relational and effective practice.

Overall, a secure-fit methodology has the potential to make judgements clearer and more consistent, provided that it is applied with appropriate professional judgement and remains grounded in children’s lived experience.

5-point scale

What do you think about our proposal to introduce the 5-point grade scale for ILACS inspections?

The Behaviour Shift supports the intention behind introducing a 5-point grade scale. Children's social care is complex, and a broader scale has the potential to give children, families, professionals and the public a more accurate picture of where practice is meeting expectations, where improvement is needed and where particularly strong practice is being sustained.

Moving away from a single headline judgement also creates an opportunity to reduce the risk of an entire service being understood through one label. A local authority may be performing strongly in some areas while facing significant challenges in others, and a more detailed grading structure should make those differences more visible.

We would encourage Ofsted to ensure that the narrative accompanying each grade remains as important as the grade itself. A label can show where a service sits on a scale, but it cannot fully explain what children and families are experiencing, why difficulties exist or what needs to change.

This is particularly important given the pressure currently experienced across children's social care. Where a service is graded as needing attention, the accompanying explanation should help distinguish between issues relating to leadership, workforce capacity, commissioning, multi-agency working or the quality of frontline practice. This would make inspection findings more useful for improvement rather than simply descriptive.

We would also welcome strong practice being identified and shared in a way that helps the wider sector learn. Where practice is making a sustained difference to children and families, inspection should help explain what is working and why, rather than treating higher grades only as recognition.

Ultimately, the value of a 5-point scale will depend on whether it creates greater understanding rather than simply more labels. Used alongside clear narrative evidence and children's lived experience, it could provide a more balanced and useful picture of local authority children's services.

For each of the following proposed ILACS grades, what do you think about the description we have proposed?

Exceptional	The proposed description is clear and appropriately sets a very high bar. We support the expectation that exceptional practice should be among the best nationally and capable of contributing to wider sector learning. It will be important, however, that this grade reflects sustained impact for children and families over time rather than isolated examples of excellent practice.
Strong standard	The description appears appropriate and usefully distinguishes practice that goes beyond the expected standard. We would welcome clear criteria showing that strong practice is consistent, embedded and having a meaningful positive impact on children and families, rather than simply demonstrating good systems or processes.
Expected standard	We think this is a helpful description because it makes clear that the expected standard should represent services doing what children and families should reasonably be able to expect, including meeting legal, statutory and professional requirements. It will be important that this grade is not interpreted as a minimal or mediocre level of practice, but as a genuinely sound standard of care and support.
Needs attention	We support the distinction between services that need improvement and those requiring urgent intervention. The description is useful because it allows Ofsted to identify inconsistency or weakness before it becomes more serious. We would encourage the accompanying narrative to explain clearly what is affecting children's experiences and whether the issue relates to workforce pressure, leadership, commissioning, multi-agency working or frontline practice, so that the grade supports meaningful improvement rather than simply labelling the service.
Urgent improvement	The proposed description is appropriately reserved for serious, critical or systemic shortcomings where urgent action is required. This distinction is important because it avoids treating all weaknesses as equivalent. Where this grade is used, the inspection narrative should be particularly clear about the nature of the risk to children, what requires immediate improvement and whether the concerns are widespread or concentrated within a particular part of the service.

ILACS proposals: How we report

Report cards

What do you think about our proposal to introduce report cards for ILACS inspections?

The Behaviour Shift supports the proposal to introduce report cards for ILACS inspections. Children's social care is too complex to be accurately represented by a single headline judgement, and a report card has the potential to provide a clearer and more balanced picture of where services are strong, where improvement is needed and how different parts of the system are performing.

The most useful report cards will be those that remain understandable to children, families and the wider public while still containing enough detail to be meaningful to professionals. Separate evaluation areas and clear narrative explanations should make it easier to understand why a particular grade has been reached and what needs to change.

We would particularly welcome report cards that describe the impact of services on children rather than focusing mainly on structures and processes. Strong systems are important, but families experience services through relationships, communication, consistency and the response they receive from professionals in real situations.

There is also an opportunity for report cards to support improvement across the sector by identifying strong practice clearly enough for others to learn from it. At a time when children's social care is under considerable pressure, inspection reporting should not only identify what is not working but also help make visible the approaches that are delivering positive outcomes despite those pressures.

Overall, report cards could provide a more useful and honest picture of children's social care, provided that the additional detail improves understanding rather than creating unnecessary complexity.

What are your views on including data and information in ILACS report cards?

We support including relevant data and contextual information in ILACS report cards, provided that it is used to support understanding rather than becoming a substitute for professional judgement or children's lived experience.

Data can help identify patterns in areas such as workforce stability, placement sufficiency, timeliness, repeat referrals, placement moves and outcomes. It may also help readers understand some of the pressures facing a local authority and allow inspection findings to be considered within the context in which services are operating.

However, data needs careful interpretation. The same figure can mean different things in different local areas, and numerical indicators alone cannot show the quality of relationships, the reasons behind a child's behaviour, the quality of an adult response or whether a family feels listened to and understood.

We would therefore encourage Ofsted to present data alongside clear explanation and qualitative evidence from children, families and practitioners. Where data highlights a concern, inspection should explore what sits behind that pattern rather than assuming the figure itself provides the answer.

This is particularly important in children's social care because what matters most is not simply what can be counted, but what the information tells us about the experience of the child. Used in that way, data can strengthen inspection by providing context, identifying patterns and helping inspectors ask better questions.

Which data and information would be most meaningful to include on an ILACS report card?

The most meaningful information would be data that helps explain the stability, accessibility and quality of the support children and families are actually receiving.

This could include workforce stability and turnover, social worker changes, placement stability, children placed at a distance from their home area, repeat referrals, re-entry into care, timeliness of assessments and support, availability of suitable placements, and the use of unregistered provision. Where appropriate, information about outcomes for care leavers and the effectiveness of early and family support would also provide useful context.

However, data should not be presented without explanation. For example, a high number of placement moves may identify a concern, but the report card should also help explain why those moves happened, what was done to prevent them and what the experience was like for the children involved.

We would also place significant value on information gathered directly from children, young people, parents, carers and practitioners. Measures of whether children feel listened to, understand their plans, have trusted and consistent relationships and feel involved in decisions can provide information that conventional performance data cannot.

Where possible, data should also show patterns over time rather than presenting a single snapshot. This would help demonstrate whether pressures are increasing, whether improvement is being sustained and whether changes made by leaders are having an impact.

Ultimately, the most meaningful report card would bring quantitative data together with lived experience and professional context. Numbers can show where inspectors should look, but understanding what sits behind those numbers is what tells us whether children are receiving the response and support they need.

ILACS proposals: Children, young people, parents, carers and family engagement

How can we better engage with children and young people during ILACS inspections?

Children and young people are more likely to engage meaningfully when the approach feels accessible, relational and appropriate to them rather than overly formal or process-led.

Ofsted should continue offering different ways for children to share their experiences, including face-to-face conversations, digital options, anonymous feedback and opportunities to communicate through trusted adults where appropriate. Not every child will feel comfortable expressing themselves in the same way, particularly where they have experienced trauma, instability or difficult relationships with professionals.

Language is also important. Children may describe their experiences very differently from the terminology used by professionals. Inspectors should be able to recognise that different language can still carry the same meaning and avoid placing too much weight on whether a child expresses themselves in formal or expected terms.

Engagement should also focus on what children actually experience day to day: whether they feel listened to, whether they understand decisions being made about them, whether adults do what they say they will do, whether they have trusted relationships and whether they feel safe enough to disagree or raise concerns.

Where possible, children should also understand what happens to the information they provide. Asking for views without showing how those views influence inspection can risk engagement becoming tokenistic. Closing that feedback loop could help children see that their contribution has value.

Most importantly, inspectors should remain curious about behaviour as well as spoken responses. A child who appears disengaged, angry or unwilling to participate may still be communicating something important about their experience. Understanding the response around that behaviour can sometimes tell us as much as a formal conversation.

How can we better engage with parents, carers and families during ILACS inspections?

Parents, carers and families should be offered a range of accessible ways to contribute to ILACS inspections, particularly those who may feel anxious about speaking openly or who have previously felt unheard within services.

Engagement should not rely only on written surveys or formal interviews. Offering telephone conversations, face-to-face discussions, digital options and opportunities to provide anonymous feedback could help reach a wider range of families.

Inspectors should also consider how language, confidence, previous experiences with professionals and fear of judgement can affect engagement. Some families may struggle to express their concerns in professional language, but that should not reduce the value of what they are saying. Different language can still carry the same meaning.

We would encourage Ofsted to explore not only whether families were consulted, but whether they felt listened to, understood and meaningfully involved in decisions. There is an important difference between being given an opportunity to speak and feeling that what you said genuinely influenced the response.

Family engagement should also consider the quality of relationships with professionals. Where relationships have broken down, inspection should remain curious about what contributed to that breakdown rather than automatically interpreting disengagement as unwillingness to work with services. In many cases, changing the response around a family can change the outcome of the relationship.

It is also important that Ofsted hears from a broad range of families, including those whose experiences have been difficult, rather than mainly those who are easiest to engage. This would help provide a more balanced picture of how local authority services are experienced in practice.

ILACS proposals: ILACS inspection scheduling

What do you think about our proposals for ILACS scheduling?

We broadly support the proposed approach to ILACS scheduling. A standard inspection for every local authority under the renewed framework should provide a clear baseline and help ensure that all authorities are assessed consistently against the new expectations.

A four-year inspection cycle could also provide local authorities with more space to embed improvement and demonstrate sustained change over time, rather than responding primarily to the pressure of frequent full inspections.

However, the effectiveness of this approach will depend heavily on the use of focused visits, monitoring visits and annual engagement between standard inspections. Children's social care can change quickly, particularly where there are workforce pressures, placement shortages, changes in leadership or increases in the complexity of children's needs. Inspection activity therefore needs to remain responsive to emerging concerns rather than relying only on the standard cycle.

We would also encourage Ofsted to continue considering the burden of inspection on services operating under significant pressure. Inspection must remain rigorous, but careful coordination and proportionality can help ensure that the process itself does not unnecessarily reduce the time and capacity available for frontline practice.

Overall, the proposed schedule appears reasonable provided that Ofsted retains enough flexibility to increase scrutiny where concerns emerge and reduce unnecessary inspection activity where services are demonstrating sustained and stable practice.

What do you think about the idea to explore assurance visits, which would take place between standard inspections, and would review one evaluation area graded 'needs attention'?

We support the principle of introducing assurance visits between standard inspections. Where an evaluation area has been graded as needs attention, it seems reasonable for a local authority to have an opportunity to demonstrate meaningful improvement before the next full inspection rather than potentially carrying that grade for several years.

Assurance visits could also provide useful accountability by testing whether improvement plans have translated into sustained changes in practice. This is particularly important in children's social care, where introducing a new policy or process does not necessarily mean that children and families are experiencing a different response.

We would therefore encourage assurance visits to look beyond whether actions have been completed and consider whether changes are embedded in frontline practice, understood by practitioners and having a measurable impact on children's experiences and outcomes.

The timing of these visits should also allow sufficient opportunity for genuine change to take place. Services operating under significant workforce and placement pressures may need time to recruit, develop staff, strengthen relationships and embed new ways of working. Returning too quickly could risk judging activity rather than impact, while waiting too long could delay recognition of meaningful improvement.

Used proportionately, assurance visits could support a more responsive inspection system by recognising improvement earlier while maintaining appropriate scrutiny of areas where concerns have previously been identified.

ILACS proposals: Additional questions

What effect do you think the proposed ILACS changes will have on leaders', practitioners' and inspectors' workload and wellbeing?

The proposed changes have the potential to support workload and wellbeing if they lead to clearer expectations, more proportionate inspection activity and a stronger focus on the everyday work that services are already carrying out.

However, any significant change to an inspection framework is likely to create additional pressure during the transition period. Leaders and practitioners will need time to understand the new evaluation areas, grading methodology, report cards and expectations. There is a risk that organisations respond by creating additional monitoring systems, documents or evidence specifically for inspection, even where this is not Ofsted's intention.

This is particularly important in a sector already operating under considerable pressure. Workforce instability, recruitment and retention challenges, placement shortages, increasing complexity of need and high levels of risk can all affect practitioners' capacity and wellbeing. Inspection reform should avoid unintentionally adding another layer of administrative demand to professionals whose primary focus needs to remain on children and families.

We would therefore encourage Ofsted to make clear that the renewed framework should be evidenced through the normal business of delivering children's social care wherever possible. Strong practice should be visible through the experiences of children and families, the quality of relationships, decision-making and outcomes, rather than through the creation of additional paperwork for inspection.

There may also be wellbeing benefits if the new approach produces more nuanced judgements and clearer explanations of strengths and areas for improvement. Moving away from one headline judgement could help reduce some of the pressure associated with inspection by recognising that complex services can have both strengths and areas requiring development.

The impact on inspectors should also be considered. A more detailed framework, broader engagement and increased use of contextual information may require additional time, training and professional support to ensure judgements remain consistent and meaningful.

Overall, the reforms should aim to make inspection rigorous without making it unnecessarily burdensome. The more closely inspection reflects the real work of supporting children and families, the less likely it is to create additional activity solely for the purpose of being inspected.

Ofsted itself says the reforms are intended to focus inspection more closely on what matters to children and families, while its equality assessment considers impacts on leaders, staff and inspectors. GOV.UK

What steps could we take to reduce or manage any unintended consequences of our proposals?

A key step would be to communicate clearly that the renewed framework should not require organisations to create additional evidence or processes purely for inspection.

Where possible, inspectors should use information generated through normal practice and focus on how that practice is experienced by children and families.

We would also encourage Ofsted to test the framework thoroughly with local authorities, practitioners, children and families before full implementation and to remain open to making adjustments where unintended consequences become apparent.

Clear guidance, worked examples and opportunities for professionals to understand the new approach before implementation could help reduce uncertainty and prevent organisations from over-interpreting expectations or creating unnecessary systems in response.

Ofsted should also monitor whether the new grading structure unintentionally encourages services to focus on achieving particular grades rather than addressing the needs of children. Inspection should continue to reward meaningful improvement in practice and outcomes rather than activity undertaken primarily to demonstrate compliance.

Feedback from frontline practitioners should form part of this monitoring. Senior leaders may experience the framework differently from social workers, residential staff, family support workers and other professionals delivering services directly to children and families. Understanding that difference could help identify unintended workload or wellbeing consequences early.

It would also be helpful to review the impact of the changes after an initial implementation period, including their effect on workload, staff wellbeing, consistency of inspection and the experiences of children and families.

Ultimately, the success of the reforms should be judged not only by whether inspection processes work differently, but by whether they support better practice around children. Changing the framework should ultimately help change the response children and families receive, and in turn improve outcomes.

Please tell us how you think our proposed changes to ILACS may or may not impact Ofsted's public sector equality duty.

The proposed ILACS changes have the potential to support Ofsted's public sector equality duty positively, particularly through the stronger focus on children's and families' voices, more inclusive engagement and a greater emphasis on lived experience.

We would encourage Ofsted to ensure that inspection considers whether children and families with different protected characteristics are experiencing services differently, rather than relying only on overall performance data. Where possible, information should be analysed in a way that helps identify patterns of inequality or barriers to accessing support.

Engagement methods should also be flexible enough to include children and adults who may communicate differently, have disabilities, require interpretation, lack confidence in professional settings or have previously felt marginalised by services.

The Behaviour Shift would also encourage inspectors to remain aware of how language, culture, identity and professional interpretation can influence the way behaviour is understood. The same behaviour can be interpreted differently depending on assumptions about the person displaying it, so reflective and culturally aware practice is important in reducing the risk of unequal responses.

The proposed emphasis on inclusion and meaningful engagement is therefore welcome, provided that equality remains embedded across all evaluation areas rather than being treated as a separate consideration.

This fits with Ofsted's own equality assessment, which says the proposals are intended to support equality of opportunity and improve how protected characteristics are considered across social care inspection.

Do you have any other comments about our proposed changes to ILACS?

Overall, The Behaviour Shift welcomes the direction of the proposed ILACS reforms, particularly the stronger emphasis on children's lived experience, family engagement, enduring relationships, multi-agency working and a more detailed approach to inspection and reporting.

Across the proposals, we would encourage Ofsted to continue looking beyond whether systems, policies and processes are present and to consider how consistently they translate into practice. A strong plan is important, but children and families experience services through the conversations, relationships and responses that happen around them every day.

We also welcome the recognition that children's social care is operating under significant pressure. High levels of complexity, workforce instability, placement shortages and increasing demand should not reduce expectations for children, but understanding that context is important when identifying what needs to improve and what support is required to achieve sustainable change.

A recurring theme throughout our response is the importance of shared understanding. Children, families, residential staff, social workers, health professionals and other agencies may use different language to describe the same underlying need. Different language can still carry the same meaning, and inspection can play an important role in identifying where those differences are preventing a coherent response around the child.

Ultimately, inspection should help services understand not only whether they are compliant, but whether the response around the child is working. Behaviour is often communication, and where outcomes are not improving, there should be curiosity about what can change in the environment, relationships and adult response.

For The Behaviour Shift, this is captured simply as: Change the Response. Change the Outcome.

The proposed reforms have the potential to support that shift if they remain focused on what children and families actually experience and help the sector learn, improve and respond more effectively.

Social care common inspection framework (SCCIF)

Would you like to share your views on our proposals for SCCIF?

Yes

SCCIF proposals: The content of our inspection frameworks

Our ambition for SCCIF inspections

What do you think about our proposed statement of ambition for children's social care inspections in relation to SCCIF?

The Behaviour Shift broadly supports the proposed statement of ambition for SCCIF, particularly the emphasis on children's lived experience, enduring relationships, inclusive practice and the quality of care and support they receive.

For providers, inspection should continue to look beyond whether policies, plans and procedures are in place and consider how consistently these are translated into everyday practice. Children experience care through relationships, language, boundaries, routines and the responses they receive from adults, particularly during difficult or high-risk moments.

We would particularly welcome a strong focus on relational practice. Children living in residential or other social care settings may have experienced significant disruption, trauma or instability before arriving. The quality and consistency of the relationships around them can therefore be central to whether they feel safe, understood and able to make progress.

Inspection should also remain curious about how behaviour is understood. Behaviour can communicate need, fear, frustration, mistrust or previous experience. Where providers are able to understand what sits behind behaviour and respond consistently rather than simply reacting to the behaviour itself, this can have a significant impact on outcomes.

We also believe it is important that inspection recognises the pressures providers are working under, including workforce challenges, placement complexity, increasing levels of risk and wider system pressures. This should not lower expectations for children, but it can help inspectors understand what supports or prevents providers from delivering stable, relational and effective care.

Overall, the proposed ambition provides a strong direction if it continues to focus on the quality of the response children actually experience, not only the quality of the systems surrounding them.

How can SCCIF inspections support providers to care for the children who have the most complex lives?

SCCIF inspections can support providers caring for children with the most complex lives by looking closely at how staff understand and respond to behaviour, risk and changing levels of need.

Children with complex lives may present with behaviours that are challenging, high risk or difficult for adults to manage. Inspection should remain curious about what those behaviours may be communicating and whether the provider is able to maintain a relational, consistent and thoughtful response when pressure increases.

The quality of care should not be judged simply by whether incidents occur. For some children, progress may be seen in smaller but significant changes, such as increased trust, improved engagement, fewer placement breakdowns, better recovery following incidents or a growing ability to accept support. Inspection should therefore consider how well staff know the child, whether responses are consistent across the team, whether language used about the child is respectful and whether plans actually guide practice in real situations.

We would also encourage Ofsted to look at the support available to staff. Caring for children with highly complex needs can place considerable emotional and practical pressure on practitioners. Supervision, reflective practice, training, stable staffing and effective leadership are all important in helping staff maintain safe and relational responses rather than becoming increasingly reactive or procedural.

Multi-agency support also matters. Providers cannot meet every need in isolation, and inspection should consider whether children have timely access to health, education, social work and specialist services where required.

For The Behaviour Shift, this comes back to a simple principle: when behaviour changes or risk increases, the adult response matters. Change the Response. Change the Outcome.

How can SCCIF inspections encourage providers and local authorities to make sure that children are able to receive the right type of care and support in the right place?

SCCIF inspections can encourage providers and local authorities to focus more strongly on the quality of placement matching, not simply whether a placement is available.

Inspection should consider whether the child's needs, relationships, identity, risks, strengths and likely support requirements were properly understood before a placement was made, and whether the provider had the staffing, skills and resources needed to meet those needs safely and sustainably.

This is particularly important for children with complex lives. Ofsted has previously recognised that local authorities can struggle to find suitable homes for children with high or multiple needs, and that providers may sometimes be reluctant to accept referrals where they fear the impact on inspection outcomes.

Inspection should therefore avoid creating incentives for providers to accept only children whose needs are perceived as easier to manage. A provider should be able to demonstrate thoughtful risk assessment, preparation and support without being disadvantaged simply because the child they care for has a high level of need.

At the same time, providers should be expected to be clear about what they can and cannot safely offer. Accepting a placement that cannot realistically be supported can lead to instability, repeated incidents and ultimately another breakdown for the child.

We would also encourage inspection to look at how well local authorities and providers communicate before and after a placement is made.

Good matching is not a single decision; it requires accurate information, realistic planning, access to specialist support and ongoing review as the child's needs change.

The aim should be for children to receive care in a setting that can understand them, respond consistently and provide stability, rather than expecting the child to repeatedly adapt to whatever provision happens to be available.

What further changes can be made to ensure SCCIF inspections focus on what matters for children?

SCCIF inspections should continue to strengthen their focus on what children actually experience in everyday life, including relationships, stability, belonging, communication and the quality of the adult response around them.

Inspection should consider not only whether children have plans, risk assessments and behaviour support strategies, but whether staff understand those plans and can apply them consistently in real situations. The quality of care often becomes most visible when a child is distressed, angry, frightened or taking risks.

We would encourage Ofsted to look closely at how children are spoken about as well as how they are spoken to. Language can shape professional understanding and can influence whether behaviour is seen primarily as a problem to manage or as communication that needs to be understood.

This is also where different language can carry the same meaning. Children, residential staff, social workers and other professionals may describe the same situation very differently, and inspection can help identify whether those differences are preventing a shared understanding of the child.
Greater attention could also be given to the consistency of relationships around children.

Staff turnover, agency use and frequent changes of key adults can have a significant impact on children who may already have experienced instability. Inspection should consider whether providers are creating the conditions for children to develop and maintain trusted relationships.

We would also encourage inspectors to recognise progress that may not always be captured by conventional outcome measures. For some children, progress may mean remaining in a placement, rebuilding trust after an incident, beginning to communicate more openly or accepting support that they previously rejected.

Ultimately, SCCIF should continue moving towards an inspection approach that asks not only whether the provider has the right systems, but whether those systems result in children feeling safe, known, understood and supported by adults who can respond consistently when things become difficult.

SCCIF evaluation areas

What do you think of our proposal to add an evaluation area on enduring relationships into the SCCIF?

The Behaviour Shift strongly supports the proposal to introduce a specific evaluation area on enduring relationships within SCCIF.

For many children involved in social care, instability in relationships may already be a significant part of their experience. Changes of placement, staff turnover, changes of social worker and disrupted family relationships can all affect trust, belonging and a child's willingness to engage with adults.

Inspection should therefore look closely at whether providers are creating opportunities for children to develop and maintain safe, trusted and meaningful relationships over time. This should include relationships with staff, family members, previous carers, friends and other important adults where those relationships are safe and in the child's interests.

It will also be important to look beyond whether relationships are recorded in plans. Inspectors should consider whether children experience consistency, whether adults remain emotionally available during difficult periods and whether important relationships are protected when behaviour or risk increases. We would particularly encourage Ofsted to consider workforce stability within this evaluation area.

Providers cannot offer enduring relationships if children repeatedly experience changes of staff or if the adults around them do not have sufficient time and support to build meaningful connections.

The addition of this evaluation area sends an important message that relationships are not separate from care; they are a central part of how care is experienced and how children develop safety, trust and stability.

This fits closely with the wider policy direction that enduring relationships should be treated as a core purpose of care rather than an optional extra.

What do you think about our proposal to add 'the quality of foster carer recruitment, assessment and support' as an additional evaluation area for independent fostering agencies?

We support the proposal to introduce a specific evaluation area on the quality of foster carer recruitment, assessment and support for independent fostering agencies.

Recruitment should not focus only on increasing numbers. The quality, suitability and preparedness of foster carers are equally important, particularly as children entering care may have increasingly complex needs and require carers who are able to respond with consistency, patience and understanding. Assessment should therefore explore not only practical suitability, but carers' understanding of trauma, behaviour, relationships, identity and the impact that caring for a child with complex experiences can have on the household.

Ongoing support is equally important. Foster carers need access to good supervision, training, responsive professional advice and meaningful support when placements become difficult. Without this, carers may feel isolated or overwhelmed, which can increase the risk of placement instability.

We would also encourage inspection to look at whether foster carers are helped to understand behaviour as communication rather than simply as something to manage. How adults interpret and respond to behaviour can have a significant impact on trust, relationships and placement stability.

A separate evaluation area could therefore provide a clearer picture of whether agencies are not only recruiting carers, but creating the conditions in which those carers can provide stable, relational and sustainable care.

SCCIF proposals: How we grade

Removing the ‘overall experiences and progress’ judgement from SCCIF

What do you think about our proposal to remove the ‘overall experiences and progress’ judgement from SCCIF?

The Behaviour Shift supports the proposal to remove the overall experiences and progress judgement, provided that children’s lived experience remains central across every individual evaluation area.

A single overall judgement can sometimes simplify a service that is much more complex in practice. A provider may demonstrate strong practice in some areas while experiencing significant challenges in others, and separate grades with clear narrative should provide a more useful picture of where the service is working well and where improvement is required.

However, removing the overall experiences and progress judgement should not result in children’s experiences becoming less visible. The experience of the child should remain the thread running through each evaluation area, rather than becoming something considered separately from safeguarding, leadership, relationships or care practice.

Inspection should continue to ask what the different elements of a service mean for the child in everyday life. Policies, staffing arrangements and care planning are important, but their value is ultimately demonstrated through whether children feel safe, understood, supported and able to develop trusted relationships.

We would also encourage Ofsted to ensure that progress is understood individually. For children with complex experiences, meaningful progress may not always be reflected through conventional measures. Remaining in a placement, rebuilding trust, recovering differently following an incident or beginning to engage with adults may represent significant progress for an individual child.

The move away from a single overall judgement could therefore provide a more nuanced picture, as long as children’s lived experiences and individual progress remain visible throughout the new framework.

Secure fit and 5-point scale

What do you think about our proposal to introduce the ‘secure fit’ grading methodology for SCCIF inspections?

We support the principle of introducing a secure-fit grading methodology for SCCIF if it provides greater clarity and consistency for children, families, providers and inspectors.

Requiring providers to securely meet the criteria associated with a particular grade should help ensure that significant weaknesses are not obscured by stronger practice elsewhere. It should also give providers a clearer understanding of what improvement is required.

However, social care practice is complex and the methodology should retain sufficient professional judgement to distinguish between an isolated issue and a wider or systemic weakness.

This is particularly important for providers caring for children with highly complex needs. The occurrence of incidents, safeguarding concerns or periods of increased risk should not automatically be interpreted as evidence of poor care. Inspection should consider the quality of the provider’s response, whether risks were understood and managed appropriately and whether staff continued to provide consistent and relational support during difficult periods.

The approach should also recognise that providers are operating within a wider system. Workforce pressures, placement sufficiency and access to external health, education or specialist services can affect the circumstances in which care is delivered. These factors should provide context without reducing accountability for the quality of care children receive.

Ultimately, secure fit should help establish a clear and consistent standard while preserving the professional curiosity needed to understand what is actually happening around the child.

What do you think about our proposal to introduce the 5-point grade scale for SCCIF inspections?

The Behaviour Shift supports the introduction of a 5-point grade scale for SCCIF inspections. A broader scale should allow Ofsted to provide a more nuanced picture of the quality of care being provided and distinguish more clearly between services that are meeting expectations, exceeding them and those where improvement is required.

This is particularly important in children's social care because providers can have significant strengths alongside areas requiring development. Separate grades across evaluation areas should make it easier for children, families, commissioners and providers to understand where practice is strong and where change is needed.

We would encourage Ofsted to ensure that the narrative accompanying each grade remains central. A grade alone cannot explain the complexity of the children being cared for, the pressures affecting a service or the quality of the response provided during difficult periods.

The grading system should also avoid creating unintended incentives for providers to become more risk-averse when considering referrals for children with complex needs. High levels of behaviour, incidents or safeguarding activity should be understood within the context of the child and judged alongside the quality, consistency and effectiveness of the provider's response.

Overall, the 5-point scale has the potential to provide a clearer and more balanced picture of providers, provided that professional judgement and children's lived experience remain central to how grades are reached.

For each of the following proposed SCCIF grades, what do you think about the description we have proposed?

Exceptional	The proposed description is appropriate and should represent practice that is consistently exceptional and makes a significant and lasting difference to children's lives. We would expect this grade to reflect practice that is embedded across the service and sustained over time, rather than relying on isolated examples of excellence. Where exceptional practice is identified, it would also be valuable for Ofsted to explain clearly what is working and why, so that learning can be shared across the wider sector.
Strong standard	The description provides a useful distinction between meeting the expected standard and delivering consistently stronger practice. Strong standard should reflect care that is reliably well delivered across the service, with clear evidence that the quality of relationships, leadership and practice is having a positive and sustained impact on children. It will be important that this grade reflects consistency rather than isolated strengths within an otherwise variable service.
Expected standard	The proposed description is helpful because it establishes a clear baseline for what children, families and commissioners should reasonably expect from a regulated provider. Expected standard should represent safe, consistent and effective care where legal requirements, regulatory standards and expectations for practice are being met. We would encourage Ofsted to ensure that expected standard is not interpreted as a minimum or mediocre level of care. Children should be able to expect good relationships, thoughtful responses and care that understands and meets their individual needs as part of the normal standard.
Needs attention	We support the distinction created by a needs attention grade. It provides an opportunity to identify inconsistency or weakness before those issues become more serious. The accompanying narrative should clearly explain how the concerns are affecting children and whether they relate to areas such as staffing, leadership, relationships, care planning or the consistency of frontline practice. This grade should support meaningful improvement rather than simply labelling the provider, particularly where services are already working to address identified pressures or weaknesses.
Urgent improvement	The proposed description appropriately reserves urgent improvement for serious or systemic concerns requiring immediate action. Where this grade is used, Ofsted should clearly explain the nature of the concerns, how they are affecting or potentially affecting children and what needs to change urgently. It is also important to distinguish between serious failures in the quality or safety of care and the presence of high levels of risk associated with the needs of the children being supported. Providers caring for children with complex lives should be judged on the quality of their response to risk, not simply on the existence of risk itself.

SCCIF proposals: How we report

What do you think about our proposal to introduce report cards for SCCIF inspections?

The Behaviour Shift supports the proposal to introduce report cards for SCCIF inspections. Social care provision is complex, and a report card has the potential to provide a clearer and more balanced picture of where a provider is performing strongly and where improvement is required.

Separate evaluation areas should make it easier for children, families, commissioners and providers to understand the quality of different aspects of a service rather than relying on one headline judgement to represent everything.

We would encourage Ofsted to ensure that report cards remain accessible and easy to understand. Greater detail is useful, but it should not become so complex that children, families or members of the public struggle to understand what the inspection is saying.

The narrative accompanying grades should also remain central. A grade alone cannot explain the complexity of the children being supported, the pressures affecting a service or the quality of the response provided during periods of increased risk.

Most importantly, report cards should continue to show what inspection findings mean for children in everyday life. The quality of systems matters, but their value is ultimately demonstrated through whether children feel safe, understood, supported and able to develop stable relationships.
Used in this way, report cards could provide a more meaningful picture of provider quality and support improvement across the sector.

What are your views on including data and information in SCCIF report cards?

We support the inclusion of relevant data and information within SCCIF report cards where it helps provide context and improve understanding of the service.

Useful information could include workforce stability and turnover, use of agency staff, placement stability, admissions and unplanned endings, safeguarding activity, restrictive practice and other information that helps explain the circumstances in which care is being delivered.

However, data should always be interpreted carefully. Providers caring for children with highly complex needs may record higher levels of incidents, safeguarding concerns or other activity than services supporting children with different needs. Those figures should not automatically be treated as indicators of poorer care.

Inspection should therefore consider what sits behind the data. Where incidents are frequent, for example, the important questions include how staff responded, whether children were supported to recover, whether learning took place and whether practice adapted appropriately afterwards.

Quantitative information should also be balanced with qualitative evidence from children, families and practitioners. Numbers cannot fully show whether a child trusts the adults around them, feels understood, experiences consistent boundaries or believes that staff genuinely care about them.

Used alongside professional judgement and children’s lived experience, data can help identify patterns and support better questions. Used without context, it risks creating an incomplete or misleading picture of the quality of care.

Which data and information would be most meaningful to include on a SCCIF report card?

The most meaningful information would be data that helps explain the stability, quality and context of the care being provided.

This could include workforce stability and turnover, use of agency staff, staff vacancies, placement stability, admissions and unplanned endings, safeguarding activity, restrictive practice, missing episodes, education engagement and access to health or specialist support where relevant.

Information about the continuity of relationships would also be valuable. For example, where possible, data showing changes in key workers or significant staffing instability could help provide context about the consistency children experience.

However, this information should always be considered alongside the needs and circumstances of the children being supported. A service caring for children with highly complex needs may record higher levels of incidents, safeguarding concerns or restrictive interventions without this necessarily indicating poorer care.

Inspection should therefore look at patterns over time and explore what sits behind the figures. Where incidents or placement disruptions increase, the report card should help explain whether the provider identified the causes, adapted practice and supported children effectively afterwards.

We would also place value on information gathered directly from children, families and practitioners. Measures of whether children feel safe, listened to, understood and able to trust the adults around them can provide important information that numerical data alone cannot capture.

The most useful report card would therefore combine quantitative data with professional context and lived experience, so that the figures help explain the service rather than define it.

SCCIF proposals: Children, young people, parents, carers and family engagement

How can we better engage with children and young people during SCCIF inspections?

Children and young people are more likely to engage meaningfully when inspection feels accessible, respectful and appropriate to them rather than overly formal.

Ofsted should continue offering different ways for children to share their views, including face-to-face conversations, digital options, anonymous feedback and opportunities to communicate through trusted adults where appropriate.

Inspectors should also consider the setting and timing of conversations. Some children may be more comfortable talking while engaged in an activity or in a familiar environment rather than through a formal sit-down discussion.

Language is also important. Children may describe their experiences differently from the terminology used by professionals. Inspectors should recognise that different language can still carry the same meaning and avoid judging the value of a child's contribution by how formally they express it.

Engagement should explore what children actually experience day to day, including whether they feel listened to, whether staff understand them, whether boundaries feel consistent and fair, whether adults do what they say they will do and whether children feel safe enough to raise concerns.

Inspectors should also remain curious where children appear reluctant, angry or disengaged. Behaviour itself may communicate something important about trust, relationships or previous experiences with adults.

Where possible, children should also understand what happens with the views they share. Closing that feedback loop can help demonstrate that their contribution has genuine value rather than being collected simply as part of an inspection process.

How can we better engage with parents, carers and families during SCCIF inspections?

Parents, carers and families should be offered accessible and flexible ways to contribute to SCCIF inspections, including telephone conversations, digital feedback, face-to-face discussions and anonymous options where appropriate.

Inspectors should recognise that some families may feel anxious about speaking openly, particularly where relationships with services have been difficult or where they fear that criticism could affect the care their child receives.

Engagement should therefore be approached in a way that feels non-judgemental and allows families to describe their experiences in their own language. Different language can still carry the same meaning, and families should not need to understand professional terminology for their views to be taken seriously.

Inspection should consider not only whether providers communicate with families, but the quality of that communication. Families should feel informed, listened to and meaningfully involved in decisions where appropriate.

Where relationships between families and providers have become difficult, inspectors should remain curious about what contributed to that breakdown rather than assuming that one party is simply unwilling to engage.

We would also encourage Ofsted to hear from a broad range of families, including those whose experiences have been challenging, rather than relying mainly on those who are easiest to contact or most confident speaking with professionals.

Meaningful family engagement can provide valuable insight into whether the care a child receives is consistent, relational and responsive to their needs both within the service and across the wider network around them.

SCCIF proposals: Additional questions

What effect do you think the proposed SCCIF changes will have on leaders', practitioners' and inspectors' workload and wellbeing?

The proposed SCCIF changes have the potential to support workload and wellbeing if they lead to clearer expectations, more proportionate inspection activity and a stronger focus on the everyday quality of care that providers are already delivering.

However, any significant change to an inspection framework is likely to create additional pressure during the transition period. Leaders and practitioners will need time to understand the new evaluation areas, grading methodology, report cards and expectations.

There is a risk that providers respond by creating additional documents, monitoring systems or evidence specifically for inspection, even where this is not Ofsted's intention. This could add unnecessary administrative pressure to services where staff capacity is already stretched.

This is particularly important in children's social care, where workforce shortages, recruitment and retention difficulties, placement complexity and increasing levels of risk can already place considerable pressure on staff wellbeing.

We would encourage Ofsted to make clear that strong practice should be evidenced through the normal delivery of care wherever possible. The quality of relationships, decision-making, responses to risk and children's lived experience should carry greater weight than additional paperwork created specifically for inspection.

There may also be benefits to wellbeing if the new framework provides more nuanced judgements and clearer recognition of both strengths and areas for improvement. This could help reduce some of the pressure associated with a single headline judgement.

The impact on inspectors should also be considered. A more detailed framework and increased focus on contextual evidence may require sufficient time, training and professional support to ensure inspections remain consistent and meaningful.

Overall, the reforms should aim to remain rigorous while avoiding unnecessary additional burden on services whose primary focus needs to remain on supporting children.

What steps could we take to reduce or manage any unintended consequences of our proposals?

A key step would be to communicate clearly that the renewed framework should not require providers to create additional evidence or processes purely for inspection.

Ofsted should continue to use evidence generated through normal care practice and focus on what that evidence shows about the experiences and outcomes of children.

Clear guidance, worked examples and appropriate implementation support could help prevent providers from over-interpreting new expectations and creating unnecessary systems or paperwork in response.

We would also encourage Ofsted to monitor whether the new grading methodology creates unintended risk aversion. Providers should not feel discouraged from caring for children with complex needs because they fear that higher levels of incidents, safeguarding activity or risk could negatively affect inspection outcomes. Inspection should continue to distinguish between the existence of risk and the quality of the response to that risk.

Feedback from frontline practitioners should also form part of ongoing evaluation of the new framework. Registered managers and senior leaders may experience inspection differently from residential staff and other practitioners working directly with children, and those differences are important when considering workload and wellbeing.

Children's and families' experiences should also be monitored after implementation to establish whether the reforms are producing meaningful changes in the quality of care they receive. A formal review after an initial implementation period would allow Ofsted to identify unintended consequences and make adjustments where necessary.

Ultimately, changes to inspection should support better practice around children rather than create additional activity around inspection itself. The focus should remain on changing and strengthening the response children experience in everyday care.

Please tell us how you think our proposed changes to SCCIF may or may not impact Ofsted's public sector equality duty.

The proposed SCCIF changes have the potential to support Ofsted's public sector equality duty positively, particularly through the stronger focus on children's lived experience, inclusive engagement and the quality of relationships.

We would encourage Ofsted to ensure that inspection considers whether children with different protected characteristics experience care differently, rather than relying only on overall performance information.

Engagement methods should remain flexible enough to include children and families who may communicate differently, require additional support, use interpreters or have less confidence in formal settings.

Inspectors should also remain aware of how culture, identity, disability and professional assumptions can influence the interpretation of behaviour. The same behaviour may be understood differently depending on who is displaying it, so reflective and culturally aware practice is important in reducing the risk of unequal responses.

Equality should therefore remain embedded across all SCCIF evaluation areas rather than being treated as a separate consideration. This would help ensure that inspection looks not only at whether services are safe and effective overall, but whether they are experienced fairly and inclusively by all children.

Do you have any other comments about our proposed changes to SCCIF?

Overall, The Behaviour Shift welcomes the direction of the proposed SCCIF reforms, particularly the stronger emphasis on children's lived experience, enduring relationships, more detailed evaluation areas and a more nuanced approach to grading and reporting.

Across the proposals, we would encourage Ofsted to continue looking beyond whether providers have appropriate systems, policies and plans in place and consider how consistently those systems translate into everyday care.

Children experience services through relationships, language, boundaries, routines and the responses they receive from adults, particularly during periods of distress, conflict or increased risk. We also welcome the recognition that providers are operating within a sector under significant pressure. Workforce instability, recruitment and retention challenges, placement complexity and increasing levels of need can all affect the environment in which care is delivered. These pressures should not lower expectations for children, but understanding them is important when identifying what needs to improve and what support is required to make change sustainable.

A consistent theme throughout our response is that behaviour should be understood in context. Where children present with behaviour that is challenging or high risk, inspection should remain curious about what that behaviour may be communicating and whether the adults around the child are able to respond safely, consistently and relationally.

Different professionals may use different language to describe the same child or need. Different language can still carry the same meaning, and inspection can play an important role in identifying whether those differences are preventing a shared and effective response.

Ultimately, the success of the renewed SCCIF should be judged by whether it helps strengthen the quality of care children actually experience. For The Behaviour Shift, this is captured simply as: Change the Response. Change the Outcome.

Feedback

We are committed to making sure that our consultations are accessible. To enable us to improve our consultation processes and reach, would you be willing to tell us a bit about how you found this survey?

No - submit survey response