



# Lifting the Burdens Task Force

Review of the department for children, schools and families

**final report – recommendations**  
February 2008

**Lifting  
the burdens  
task force**

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# Foreword

Dear Secretary of State,

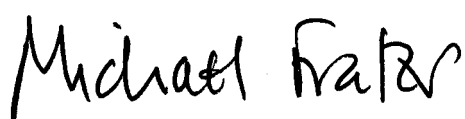
The Lifting the Burdens Task Force's review of the Department for Children, Schools and Families is the first in a series of reports to be published this year focussing on the major spending departments. The impact of these departments on local government is considerable and therefore any reduction in burden here will result in considerable savings and efficiencies for local government. From our point of view, the recommendations in this review are incredibly important if we are to deliver the ambition set out in the Local Government White Paper 2006.

We were particularly fortunate that the timing of this review coincided with departmental consultations on the proposed indicators for inclusion in the National Indicator Set (NIS). The review therefore had the opportunity to contribute to the debate about what the DCSF indicators should be. Whilst we still have some concerns about the NIS which we outline in this report, we acknowledge the helpful manner in which DCSF went about the consultation and whilst not everything we said has been accepted, a large amount has. We look forward to this dialogue continuing as the NIS evolves.

As we are in the midst of consultation on the new Comprehensive Area Assessment, we also felt it was appropriate for this review to offer some timely, constructive and challenging input to Ofsted about inspection. In particular we raise concerns about the purpose behind the new 'Local Authority Interactive Tool' which we feel need to be addressed so it does not become a second performance monitoring system for local government. We are also suggesting that inspections for the better performing councils should take place every two years in order to make the new system more proportionate.

Of particular relevance to the DCSF review is the issue of burdens emanating from ICT systems and Field Forces. The intention behind both was undoubtedly one of support, efficiency and giving some value added input, unfortunately it seems the reality is somewhat different, leading to councils seeing these as burdens. A series of recommendations are therefore made to improve their operation.

I would like to express my thanks to all those who have given generously of their time to contribute to this review. I would particularly like to thank John Coughlan, Director of Children's Services at Hampshire County Council for leading the review on behalf of the Task Force and James White, Policy and Strategy Manager, Children's Services at Sheffield City Council for his sterling support. Finally I would like to thank colleagues in DCSF for the positive and constructive way in which they have engaged with us during the review and I hope this will carry forward into the future.



Michael Frater  
Chairman, Lifting the Burdens Task Force

# 1. Introduction and Context

The Lifting the Burdens Task Force was established in September 2006 by the Rt Hon Ruth Kelly, Secretary of State for Communities and Local Government. The Task Force is chaired by Michael Frater, Chief Executive of Nottingham City Council, and this specific review was led by John Coughlan, Director of Children's Services for Hampshire County Council.

The Task Force is charged with undertaking a review of the bureaucratic burdens that exist as a consequence of the current relationship between central and local government. In particular, the Task Force is focusing on the means by which we might improve and streamline that relationship in the areas of performance management and regulation. This review makes recommendations on these issues, as well as addressing some key issues relating to ICT and what are collectively called the DCSF 'Field Forces' that impact on children's services in particular.

The Task Force has initiated a range of projects examining the nature of the relationship between individual departments of state and local government with a view to identifying specific recommendations for change in the way in which local services are monitored, regulated and held to account by sponsor departments. Each project will undertake a review in order to identify those elements of current reporting arrangements and regulatory requirements that are core to the delivery of effective and accountable service outcomes. At the same time, each project seeks to specify changes to those arrangements and requirements that can help both central and local government to deliver those outcomes more effectively and efficiently.

The Local Government White Paper sets out a clear vision for the future role of Local Authorities both as deliverers of modern, relevant and value for money services and as providers of effective and accountable leadership for communities. The White Paper sets this objective clearly in the context of a changed relationship between national and local government and between local government and the communities it serves.

*"Our aim... is to reduce radically the number of nationally-required local targets, performance indicators and reporting, and to replace these with new opportunities for citizens to hold their local providers to account for the quality of services"* (Section 6.6. Strong and Prosperous Communities October 2006).

The same theme is evident in the DCSF Children's Plan<sup>1</sup> published in December 2007, which describes the role of Local Authorities as 'Leading the System', shaping supply and demand, championing the needs of communities and commissioning services tailored to users. We welcome this reaffirmation of the central role of local authorities in achieving the ambitions of the Children's Plan. We have addressed our recommendations towards areas in which the central government – local government relationship can be enhanced through 'smarter', more focussed working.

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<sup>1</sup> Chapter 7, p147

## 2. Overview of the Review

The review undertook 3 main strands of activity:

- **Performance Indicators** – DCSF began informally consulting on its contribution to the National Indicator Set around the time this review began. Our work on this is set out in more detail in section 3 below. In December LBTF then led a workshop for over 30 local authority representatives to respond to the children's and young people's section of the technical consultation on the NIS, as part of a wider LBTF/ Local Government Association (LGA) event on the NIS. A summary of the joint LBTF/LGA response is in appendix D and full details can be found at: <http://www.lga.gov.uk/lga/core/page.do?pagelid=105317>.
- **Call for Evidence** – This was issued in July, and responses were received mainly from performance officers in children's services in 19 Local Authorities, with particularly detailed responses on the issues of IT systems and Field Forces.
- **Group meetings** – 2 meetings of the review panel (for membership see appendix B) were held to set the direction of the review, and to engage with colleagues from DCSF and Ofsted.

A significant number of informal discussions and inputs have also informed the review.

The purpose behind the various strands of work means the review has been able to engage with a wide range of front line officers and children's services professionals, corporate policy and performance officers, strategic directors, chief executives and national bodies to ensure we arrive at a balanced and representative view.

# 3. Performance Indicators

The Taskforce was asked to submit comments on the DCSF proposals for the National Indicator Set, which was consulted on between June and September 2007.

The initial submission we made is attached at appendix C. The DCSF responded formally to our submission on 21 September, and it was clear from that response and from what was eventually published in the NIS that the Department had taken the submission seriously, responding to both the general issues we raised, and also the detailed proposals in relation to specific PIs. We very much welcome this, and see the exchange as a good model on which to build future engagement with the Department.

In broad terms, our position on performance indicators is set out below:

1. We feel that the NIS PIs relating to Children and Young People lack balance when viewed through the Every Child Matters framework (ECM) of the 5 outcomes<sup>2</sup>. The set is weighted heavily towards the Enjoy and Achieve outcome area, with not enough coverage of the Positive Contribution outcome in particular. In fact, the 'Enjoy and Achieve' outcome could more accurately be called the 'Attain and Attend' outcome, as it is entirely composed of attendance and attainment measures. The PIs that map to the Staying Safe outcome area are overly focussed on statutory child protection work, at the expense of safeguarding more broadly and the contribution that is made by preventative services and early intervention.
2. In the Enjoy and Achieve outcome area, we welcome the progress made in better aligning local authority level PIs with the measures which appear in schools Achievement and Attainment Tables, but we feel that there is scope to align the performance framework for schools and local authorities still further. Having schools, councils and their partners working to the same objectives and measures is critical to the success of the ECM agenda.
3. Our Call for Evidence reinforced our already emerging view that there is a need to rationalise the consultative mechanisms the DCSF uses to engage with local authority practitioners on issues of PIs and data collection and interpretation. There are currently several groups<sup>3</sup> linked to different policy teams within the Department, which seem to have overlapping remits and an unclear line into decision-making. This does not appear to be a very efficient set of arrangements or a good model for the future. To our knowledge the best model currently operating is the

Strategic Information Group on Adult Social Care (SIGASC)<sup>4</sup>, which is the sole recognised body for regulating data collections in that sector. SIGASC will be working on detailed analysis of current data collections, with the aim of achieving significant reductions in the burden of collection, in February 2008. Our view is that the DCSF should seek to make faster progress on reducing data collection burdens than has been made to date, and should give serious consideration to adapting the SIGASC model for use in the children's services sector.

4. Whilst the NIS is a more streamlined approach than the previous performance data, there are still a considerable number of data returns required by DCSF of different types, formats and complexities which do not all appear to be used to purposeful effect. Rationalisation, simplification and consistency would be very welcome.
5. A recurring theme from our call for evidence was the variety of forms in which essentially the same data is presented and interpreted by different arms of the DCSF and the Inspectorates. This is particularly true of education data, which is presented and interpreted differently by Ofsted, the National Strategies, DCSF, the Audit Commission and Government Offices. It would seem that there are opportunities for efficiencies here between the DCSF and its agents and the Inspectorates. Another issue raised was the fact that there is no single source for local authorities to access the full range of performance data which is held by national agencies on them. We welcome the release by Ofsted of the full Annual Performance Assessment (APA) dataset in Excel format, but feel that more could be done in this area.
6. We know from some parallel work being done through the 'Narrowing the Gap' project (co-sponsored by DCSF and LGA) that the data sets collected nationally on children do not provide a full or helpful picture of the impact of public services in improving children's outcomes. We would commend the report on this to DCSF and other Government Departments as it will be helpful in creating a single comprehensive approach to collecting, interpreting and using data effectively.

Recommendations:

1. DCSF should work with local authorities and their partners to redress the imbalance in the NIS against and within the ECM 5 outcomes noted at point 1 above.

<sup>2</sup> Being Healthy, Staying Safe, Enjoying and Achieving, Making a Positive Contribution and Achieving Economic Well-Being

<sup>3</sup> Examples being the External Scrutiny Group, the Knowledge for Improvement group, the Improving Intelligence Steering Group, the Child Health Mapping Group and PIRGE.

<sup>4</sup> See <http://www.ic.nhs.uk/our-services/improving-social-care-information/review-approval-and-development/sigasc>

2. DCSF should make the commitment that all future refinements of the performance framework for schools and local authorities should be considered together, and adopt the principle that any PI on which local government is measured will also be applied to schools (and vice versa), unless there are overwhelming policy or technical reasons not to do so.
3. Subject to whatever arrangements DCLG may make for the NIS as a whole, DCSF and other Government Departments should consult on performance and data collection arrangements with councils and other interested parties via one single, nationally recognised body, and should seek to make faster progress on reducing the data collection burden on Local Authorities.
4. DCSF and the Inspectorates should work with local authorities to develop a national website holding all data used for the NIS and APA purposes, which would act as the single source of performance information for ECM outcomes, locally and nationally. DCSF and the Inspectorates should also rationalise the current system of bandings and traffic lighting of indicators as far as is possible. The work on the Interoperability Framework for Schools data could be helpful as a model.

## 4. Inspection

Inspection and regulation in children and young people's services has changed radically since the Children Act 2004. The relevant functions of bodies such as the Commission for Social Care Inspection and the Adult Learning Inspectorate have been consolidated into the new Ofsted, a new inspection framework for schools (reflective of the 5 outcomes) was introduced, and a new regime of inspection for local authorities – the Annual Performance Assessment (APA) and Joint Area Review processes (JAR) – was introduced in 2005.

Local authorities' experience of inspection under these new arrangements is rather mixed – in general the stated intention of the Inspectorates of 'inspection in inverse proportion to risk' has not been felt to have been implemented in practice, with councils that have had recent positive APA or JAR outcomes still being subject to the same level of scrutiny as less highly-rated councils. Ofsted would argue that since April 2007 those councils rated as excellent in the previous APA have had a JAR focussed on the three core areas of safeguarding looked after children, children with learning difficulties and disabilities and service management but with no additional identified investigations. This resulted in some reduction in the number of inspectors on the JAR teams for those authorities but no reduction in the number of days for which the inspectors are on site.

In a recent survey conducted by the Association of Directors of Children's Services (ADCS) of its members on the 2007 APA, 27 graded the process good or better and 25 felt it was satisfactory but 16 out of 70 respondents graded the quality of the process as poor, and there were a number of concerns about consistency and quality. Local authorities that had their JAR around the same time as their APA (together with an Enhanced Youth Inspection and a YOT inspection) were unhappy about the burden placed on them and their staff as a result of the combination of inspections despite the intention being to ensure greater alignment. Other concerns expressed relate to the competence and narrow focus of some inspectors (some of whom do not have senior level experience in local authorities, and none has had hands-on experience of running an integrated children's service), the 'old fashioned' approach of some inspections (particularly in relation to youth services), which have not kept pace with the way that children's services have been developing in an integrated way at local level, and timing, with a general view that an APA process, which does not conclude until November each year is too drawn-out (though Ofsted would point out that the timing was amended due to request from local authorities).

In the 2007 round of APA there has been a new emphasis by Ofsted on ensuring consistency in the use of performance data to enable inspectors to arrive at judgements, with the introduction of the concept of 'baseline indicators' and

an expansion of the guidance and interpretation notes made available to inspectors. This is welcome, although from the survey findings quoted above, further progress on this front still needs to be made. Clarity about the interpretation of data, and an understanding of its robustness, will be very important in the new Comprehensive Area Assessment (CAA) process, which will be heavily reliant on a desktop-based annual risk assessment of a local area, which will then trigger fieldwork by the Inspectorates. We believe that the concept of 'baseline indicators', using the NIS, should be built on in developing the CAA, and have made a specific recommendation in this regard below.

We believe that the move towards proportionate, risk-based inspection, triggered largely by analysis of data, has other significant implications that Government and the Inspectorates should consider. The availability of recent, 'real-time' data to inform a yearly process of judgement of a local area's performance is a real issue – three examples from the 2007 APA process are given below:

- Judgements made on Enjoy and Achieve around September 2007 in the APAs were made on the basis of attainment data from tests sat by pupils in summer 2006, well over a year before the APA took place, at a time when most Local Authorities will have had a reasonably good idea of what the 2007 outcomes had been. We understand that unvalidated 2007 performance data for key stages 2 and 3 only was considered by inspectors as part of the APA 2007 process to inform trends of improvement in performance and fed into the capacity to improve judgement.
- Judgements made on Being Healthy in the 2007 APAs were made on the basis of 25 indicators, only 12 of which contained any data at all for the 2006/7 period.
- In the Positive Contribution area key PIs on youth reoffending and reach of youth services contained no 2006/7 data.

The first year of CAA will effectively establish a baseline rating for each local area under the new arrangements. We do not think that, as the system stands, there is enough 'real-time' data available to really justify another full assessment the following year. The advent of the National Indicator Set is unlikely to improve matters significantly in this regard.

This will leave Ofsted and the Audit Commission with a problem of how to be truly risk-led in their approach, rather than simply continuing with a variation of their current rolling programme of blanket inspections. We believe consideration should be given to a schema whereby areas whose first CAA Risk Assessment renders

them lower risk, should receive their next CAA in two years, not one. The debate on proportionality of inspection and regulation needs to address the frequency of inspection, as well as the process.

At the present time the DCSF is also developing a 'Local Authority Interactive Tool', containing regularly updated comparable performance data on each local authority in a range of domains, compiled from the various data returns and field force reports. It is not clear what use Ofsted will make of this tool, nor how it relates to the new local area agreement arrangements and the National Indicator Set. Potentially it could help improve the timeliness of data used in inspections as well as assist authorities in their day to day management. However, there is a clear danger of it becoming a second performance monitoring system separate from the LAA/CAA arrangements, with a large number of additional indicators. This must of course be resisted firmly as being contrary to the lifting the burdens agenda. There is therefore an urgent need to develop a protocol between the CLG, DCSF, Ofsted, the LGA and ADCS concerning the use of the Interactive Tool, to clarify its purpose, its relationship with the LAA indicator set, and what relationship, if any, it should have with the inspection regime.

The consolidation of the various inspectorates dealing with children's services and education under the new Ofsted is an important step in the right direction. We do not share the view of the Commons Select Committee that the remit is too broad. On the contrary, we would argue for Ofsted taking lead responsibility on behalf of other inspectorates for issues relating to children's health and youth justice, because of the need for children's services departments not to be subject to several different (and sometimes conflicting) inspection regimes. Having said this, it is true that the issue of competence within Ofsted needs to be addressed given the breadth of this remit; however the Task Force believes that this is preferable to having to subject local services to incoherent and burdensome inspection regimes.

We also have a number of concerns about some of the regulatory aspects of Ofsted's work, particularly of fostering and adoption services. The current inspection regime is not differentiated in terms of frequency of inspections for well performing services, and needs to be. A risk led approach is as important for regulatory inspections as it is for the broader inspection regime.

Recommendations:

5. Ofsted (and any other Inspectorates involved) should use the NIS indicators as the baseline set for the CAA process, as outlined in the CAA consultation document. No other indicators other than findings from inspection and regulation, and what is available locally should be used, and local indicators should not be the subject of recommendations for improvement in any CAA report.
6. The relationship of the DCSF's newly developed 'Local Authority Interactive Tool' with the LAA and Inspection regime needs to be urgently examined, and an appropriate protocol concerning its use developed jointly with local government.
7. Government and the Inspectorates should give serious consideration to legislating to reduce the requirement for an annual risk assessment of local areas, especially as the availability of data to inform yearly judgements is patchy. Real proportionality should mean those areas who receive a positive assessment or rating should only be subject to re-assessment under the CAA every two years as opposed to every one.
8. Ofsted should take lead responsibility on behalf of other inspectorates for areas of children's services which fall within their current remit.
9. Regulatory inspections should be subject to the same proportionate approach as the future CAA inspections.

## 5. ICT Systems

Electronic data systems have the capacity to make a significant contribution to the achievement of ECM outcomes where information and knowledge can inform better decision-making. They should also deliver efficiencies in management and administration, making the operation of performance management systems straightforward and freeing resources for application at the front line.

Unfortunately, the development of electronic systems over the last few years has not always delivered these benefits. Systems appear to have been promulgated in isolation from an overarching strategy. In several cases developers and users in local authorities suggest that they have considerably increased the management and administration overhead without delivering any of the anticipated gains.

In some cases there is good evidence that new IT based approaches undermine existing effective or good practice. For example local authority staff believe that the Integrated Children's System (ICS) moves the focus of activity towards compliance with the expectations and needs of a standardised system, which appear to be chiefly related to data capture, and away from using effective professional approaches and analysis related to meeting the needs of the client family and child. The proliferation over many years of different school and local authority systems for education data is another example.

Key systems at various stages of implementation where these observations are common include the developments of ContactPoint, ICS, ESCR and eCAF.

Resources allocated to local authorities to develop, implement and maintain information systems have not always been adequate. Additional resources provided from central government are always welcome, but many in local authorities believe that the amounts identified have underestimated local implementation and delivery costs.

Recommendations:

10. DCSF should group responsibility for all children's services related IT system developments together. The collection of eCAF, ContactPoint, ICS and CCIS under a single strategic lead is a welcome step, but other systems and related policy/strategic responsibilities remain elsewhere at present.
11. To support recommendation 10 above, the checking and monitoring of systems implementation (ICS, ESCR, ContactPoint, CAF etc) should be integrated into one single process.
12. DCSF should adopt a stronger national stance on the commissioning of systems by government. The current approach is too reliant on the market. A key feature of future system specification must be the capacity for an individual solution to be tailored to meet local needs and practice models. At present, standardised systems matching only the core needs of central government are the norm, giving rise to numerous issues at local level.
13. DCSF need to consider the ancillary costs of system development as well as the direct costs (for example the creation and operation of complaints procedures and data matching procedures where systems are brought together), and fund councils accordingly.
14. In designing and specifying systems DCSF must do more to recognise that implementation in local authorities must take account of corporate developments, in terms of ICT infrastructure and Electronic Document Management Systems (EDMS) in particular.
15. In the long term a single, nationally provided children's services practitioner system might be considered.

## 6. Field Forces

There has been a marked expansion in the role of Government Offices over the last 5-6 years, driven originally by the policy of creating regional assemblies, and more latterly by the ECM and Safer Communities agendas. Over the same period, there has also been an expansion of the role of 'Fieldforces' – teams of civil servants, or private companies operating under contracts with the Government, whose job is ostensibly to support but also then monitor the delivery of services in local areas within their policy remit.

As well as having regular visits from and maintaining contact with Government Office Children's Services Advisers, a typical local authority can expect to receive visits by a number of Field forces in the course of a year. Many of these Field forces will visit more than once, and some (particularly the National Strategies) are working in local areas on a weekly basis. Others will organise regional events which representatives of local authorities are expected to attend. Some examples of Field Forces are:

- National Strategies (Primary and Secondary)
- Behaviour and Attendance
- Special Educational Needs
- Together for Children (Children's Centres)
- Extended Schools
- Teenage Pregnancy
- Substance Misuse
- Care Services Improvement Partnership
- CAHMS Development Team

Our Call for Evidence revealed that local authorities' experience of engagement with the Field Forces is varied at best. The following emerged as common themes:

- Field Forces engage with councils on the basis that they are offering support, but in reality appear to spend most of their time checking and making judgements on how well services are being delivered. They also make demands on local authorities for information and evidence. The feeling from the Call for Evidence responses was that checks and judgements are best made by Ofsted, who have the experience and expertise to carry out that role.
- There appears to be an element of 'mission creep' in the activities of some Field forces – for instance SEN Field Forces often require information on attainment of Looked After Children and school behaviour and attendance as well as SEN. Whilst there are obvious overlaps between all these areas they are covered by other Field Forces, and there is obvious duplication here.
- In cases where the council is doing everything that the Field Forces expect it to do, but an issue nonetheless remains stubbornly difficult to resolve, Field Forces appear to be able to offer limited useful inputs.

- There appears to be a 'quota-driven' approach to Field Force activity, with an expectation that there will be a certain number of monitoring visits per year regardless of how good the council's track record may be on a particular issue. One call for evidence response exemplified the general view by saying that *"The level of involvement from the Field Forces should be in inverse proportion to the success of the organisation."*

Recently there appears to have been a move by DCSF and Government Offices to better co-ordinate the activities of the Field Forces, and a protocol has been agreed between ADCS and the DCSF in an attempt to achieve this. It is perhaps too early to judge the effectiveness of the protocol, but in a policy climate where public agencies are being continually challenged to achieve financial efficiencies, reduce duplication and ensure that resources are released to support front-line delivery, we believe that more can be done in this area.

DCSF is currently tendering for organisations to deliver a 'Centre for Excellence and Outcomes in Children and Young People's Services (CfEO)'<sup>5</sup>. This is an important development in the area of support for improvement in children and young people's services. The 'high-level brief' for how this Centre would operate currently suggests a potentially interventionist approach, with the key objectives of the Centre being both to identify and disseminate good practice, *and* to influence delivery of services in local areas through the production of 'report cards', leading to local action plans.

This activity is explicitly linked to the role of Government Offices and the achievement of LAA targets. There is an obvious overlap here with the remit of the Field Forces, which was raised as an issue in the stakeholder consultation published in September. The DCSF response to this was that *"We intend to clarify how this relationship should work in principle but are mindful that there will need to be further negotiation and flexibility on this point once the successful bidder has been appointed."*<sup>6</sup> Our view is that this statement does not go far enough, and we are unclear why the decision should be contingent on the identity of the successful bidder.

We very much welcome the creation of the CfEO, but we are very concerned to ensure that the CfEO does not simply become another field force, or become perceived as such by local authorities. Our view is that the CfEO should be primarily an observatory, identifying worthwhile research and practice and feeding that learning back into the system constructively. To do this effectively, it needs to be dispassionate and, to a large extent, independent of government.

Recommendations:

16. DCSF should clarify the role it sees the CfEO playing in the general improvement support effort in children and young people's services, and should clearly delineate its role as being separate from that of the Field forces.
17. DCSF should commit to a systematic review of all the current Field Forces and evaluate them against a set of criteria agreed with the ADCS. The aim of the review should be threefold:
  - To end those Field Forces which have achieved their purpose (ie implementation complete or sufficient capacity built in councils to continue the work safely without them).
  - For those Field Forces which still need to continue, to delegate a proportion of their funding to local authorities for them to buy back Field Force support in the same way that schools buy back local authority support, while retaining a proportion to use for intervention and support work in local authorities that are struggling in a particular area of policy or implementation.
  - To review the application of the Field Force protocol and amend it accordingly.

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<sup>5</sup> See <http://www.everychildmatters.gov.uk/deliveringservices/cfeogrant/>

<sup>6</sup> Page 20 of the stakeholder consultation report, available at the link shown in footnote 2.

# 7. Conclusion

With the advent of the ECM programme in 2003, the Government set an ambitious long-term agenda for a step-change in improving outcomes for children and young people. The Children's Plan, published in December 2007, restates and builds on that agenda, and recognises that at local level the lead for implementing it lies with local government. The intended transfer of responsibility for 16-19 education from the Learning and Skills Council to local authorities is the most recent practical example of this recognition.

In 2004/5, the DfES developed the concept of a 'New Relationship with Schools' (NRWS). The key elements of this were to:

- build the capacity of schools to improve, with rigorous self-evaluation, stronger collaboration and effective planning for improvement
- enable talented school leaders to play a wider part in system-wide reform
- operate an intelligent accountability framework that is rigorous and has a lighter touch, giving schools, parents and pupils the information they need
- reduce unnecessary bureaucracy, making it easier for schools to engage the support they require without duplicative bidding, planning and reporting requirements
- improve data systems to put the most useful data on pupils' progress into the hands of schools and those who work with them
- secure better alignment between schools' priorities and the priorities of local and central government.

In many respects the last 2-3 years have seen the gradual emergence of a similar 'new relationship with local government', with the publication of the Local Government White Paper, the development of the LAA framework, and legislation such as the 2006 Education and Inspections Act. The development and ongoing implementation of the NRWS was greatly assisted by the creation in 2003 of the Implementation Review Unit (IRU), a panel of school practitioners from across the country with a remit to challenge and support the DCSF, national agencies, government regional offices and local authorities on how best to implement government policies and initiatives in schools. The IRU has a small permanent presence inside the DCSF, staffed by secondees from schools.

We believe that there would be a real benefit to the DCSF if a similar arrangement were to be made in relation to local government, particularly the concept of a small, staffed unit. The benefits as we see them would be to:

- Offer the DCSF insight into what councils actually experience as a result of DCSF policy decisions
- Act as a conduit for feedback and dialogue with councils and their representative associations on new developments
- Assist the DCSF in evaluating the effectiveness of policies and initiatives.

The creation of this unit, combined with a generally positive response from the DCSF to the recommendations made in this report, would be a massive step forward in DCSF relations with local authorities, and would better position both parties to meet the challenges ahead.

Recommendation:

18. DCSF should negotiate with ADCS on the creation of a small, staffed unit in DCSF, using the IRU as a model, to represent local government views in development and dissemination of policy.

# Appendix A

## Summary of Recommendations

1. DCSF should work with local authorities and their partners to redress the imbalance in the NIS against the ECM 5 Outcomes.
2. DCSF should make the commitment that all future refinements of the performance framework for schools and councils should be considered together, and adopt the principle that any PI on which local government is measured will also be applied to schools (and vice versa), unless there are overwhelming policy or technical reasons not to do so.
3. Subject to whatever arrangements DCLG may make for the NIS as a whole, DCSF and other Government Departments should consult on performance and data collection arrangements with councils and other interested parties via one single, nationally recognised body, and should seek to make faster progress on reducing the data collection burden on local authorities.
4. DCSF and the Inspectorates should work with local government to develop a national website holding all data used for the NIS and APA purposes, which would act as the single source of performance information for ECM outcomes, locally and nationally. DCSF and the Inspectorates should also rationalise the current system of bandings and traffic lighting of indicators as far as is possible. The work on the Interoperability Framework for Schools data could be helpful as a model.
5. Ofsted (and any other Inspectorates involved) should use the NIS indicators as the baseline set for the CAA process, as outlined in the CAA consultation document. No other indicators other than findings from inspection and regulation, and what is available locally should be used, and local indicators should not be the subject of recommendations or areas for improvement in any CAA report.
6. The relationship of the DCSF's newly developed 'Local Authority Interactive Tool' with the LAA and Inspection regime needs to be urgently examined, and an appropriate protocol concerning its use developed jointly with local government.
7. Government and the Inspectorates should give serious consideration to legislating to reduce the requirement for an annual risk assessment of local areas, especially as the availability of data to inform yearly judgements is patchy. Real proportionality should mean those areas who receive a positive assessment or rating should only be subject to re-assessment under the CAA every two years as opposed to every one.
8. Ofsted should take lead responsibility on behalf of other inspectorates for areas of children's services which fall within their current remit.
9. Regulatory inspections should be subject to the same proportionate approach as the future CAA inspections.
10. DCSF should group responsibility for all children's services related IT system developments together. The collection of eCAF, ContactPoint, ICS and CCIS under a single strategic lead is a welcome step, but other systems and related policy/strategic responsibilities remain elsewhere at present.
11. To support recommendation 10 above, the checking and monitoring of systems implementation (ICS, ESCR, Contactpoint, CAF etc) should be integrated into one single process.
12. DCSF should adopt a stronger national stance on the commissioning of systems by Government. The current approach is too reliant on the market. A key feature of future system specification must be the capacity for an individual solution to be tailored to meet local needs and practice models. At present standardised systems matching only the core needs of central government are the norm, giving rise to numerous issues at local level.
13. DCSF need to consider the ancillary costs of system development as well as the direct costs (for example the creation and operation of complaints procedures and data matching procedures where systems are brought together), and fund councils accordingly.
14. In designing and specifying systems DCSF must do more to recognise that implementation in local authorities must take account of corporate developments, in terms of ICT infrastructure and EDMS in particular.
15. In the long term a single, nationally provided children's services practitioner system might be considered.
16. DCSF should clarify the role it sees the CfEO playing in the general improvement support effort in children and young people's services, and should clearly delineate its role as being separate from that of the Field Forces.

17. DCSF should commit to a systematic review of all the current Field Forces and evaluate them against a set of criteria agreed with the ADCS. The aim of the review should be threefold:
  - To end those Field Forces which have achieved their purpose (ie implementation complete, or sufficient capacity built in councils to continue the work safely without them).
  - For those Field Forces which still need to continue, to delegate a proportion of their funding to local authorities for them to buy back Field Force support in the same way that schools buy back local authority support, while retaining a proportion to use for intervention and support work in local authorities that are struggling in a particular area of policy or implementation.
  - To review the application of the Field Force protocol and amend it accordingly.
  
18. DCSF should negotiate with ADCS on the creation of a small, staffed unit in DCSF, using the IRU as a model, to represent local government views in development of policy.

# Appendix B

## Acknowledgements

In researching and drafting this report, we are indebted to the assistance and submissions given by the following colleagues and organisations:

Review Panel:

James White, Sheffield City Council Children and Young People's Directorate, who was the lead Policy Associate to this review.

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Jane Held, LGA

Daniel Mason, LGA

John Freeman, ADCS, Dudley

Chris Waterman, ADCS

David Hawker, ADCS, Brighton and Hove

Andrew Cozens, IDeA

Chris Nichols, Implementation Review Unit

Peter Lauener, DCSF

Rachel Gapp, LBTF

Ben Wilkinson, LBTF

The Local Authorities that responded to our Call for Evidence:

London Borough of Barnet

London Borough of Hammersmith and Fulham

London Borough of Camden

London Borough of Brent

London Borough of Hounslow

Milton Keynes

Shropshire

Torbay

Wirral

Middlesborough

Nottingham

Sunderland

Rochdale

Gateshead

Flintshire

East Sussex

Wiltshire

Blackburn with Darwen

West Berkshire

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For further information please visit:

[www.communities.gov.uk/liftingburdens](http://www.communities.gov.uk/liftingburdens)

# Appendix C

## Response to the DCSF Proposal for the National Indicator Set

30 July 2007

Dear Andrew,

In response to David Bell's request to focus on the performance indicators, data collection and monitoring strand of our review, please find attached an early outcome from the Lifting the Burdens Task Force review of Children and Young Peoples' Services on the proposed DCSF national indicators. We hope this practitioner perspective on the proposals will inform your on-going discussions and help result in an indicator set that is practical and workable on the ground. The Task Force would be more than happy to meet with you and provide any further clarification or insight.

I understand you are also undertaking an internal review of all the data requests the department places on local government, and again we would be more than happy to meet with you and provide comment and challenge on this from a practitioners' perspective in order to help implement the Local Government White Paper aspirations.

### A. Method of assessment

We have assessed each proposed indicator against the following criteria:

- **Causality** – the indicator measures something which can be clearly identified as a cause of the principal outcome which you are trying to achieve
- **Cost-benefit** – the cost of producing the indicator is acceptable relative to the benefit of the information about performance derived from it (this, for example, challenges those indicators which only measure things long after the event, because then what you can do with the information is limited and the benefit low)
- **Comparability** – the indicator enables performance of the body collecting it to be compared, either with itself (longitudinally) or with others
- **Coherence** – there is a natural progression of management action that can be tested by using the indicator, from input to output to outcome and finally to impact of the outcome.

Indicators were also considered from the point of view of their relevance, auditability and potential for duplication with other PIs.

### B. General Comments

1. We agree with the thrust of the response to the NIS sent by the LGA to HMT on the 14 June 2007. In particular we would argue that Government should consider other mechanisms than the NIS, such as CAA, to provide assurance that its objectives are being met. We also feel that the overall set lacks balance when looked at from the perspective of the 5 ECM outcomes, with too many indicators under Enjoy and Achieve, not enough under Positive Contribution, and a set under Staying Safe that is too process-oriented and overly focused on social services activity at the expense of safeguarding more widely.
2. From the information available, it is not clear Government policy aspirations have been translated into the NIS. LBTF urges DCSF to work with Councils to develop indicators which offer transparency and focus to the new policy aspirations (see General Comment 6).
3. There are 7 'Delivery Goal' PIs proposed (eg number of children's centres, operation of Contactpoint). Our belief is that the PIs in the NIS should be measurements of outcomes, or at worst proxy PIs that measure a process known to have a significant impact on outcomes. The 'delivery goal' PIs do not fit this approach, and we would argue that the Government has other means at its disposal (financial incentives/penalties, legislation etc) to ensure that these delivery goals are achieved. We are therefore proposing the deletion of all these PIs.
4. There are 4 'user perception' PIs proposed, based on the Ofsted 'Tell Us 2' survey. It would have been helpful to have a user perception PI in each DSO area, but the opportunity has not been taken so far to pursue this. LBTF is supportive of the voice of children and young people carrying more weight in the way services are assessed, but we do not feel that the 'Tell Us 2' survey can be used as a source of PIs for the NIS, as the sample size is too small to be representative in large authorities, and also because big variations in practice across schools have the

potential to significantly skew the results. We do feel that the 'Tell Us 2' data is fit for its actual stated purpose – to provide Ofsted with contextual information for use in inspections, and we are supportive of this.

5. LBTF very much welcomes the aim of DSO3 – closing the gap in educational attainment, and (subject to clarification on the details) supports the inclusion of most of these PIs in the NIS, provided that they are also included as measures in the DCSF achievement and attainment tables of schools, and form part of the dataset for Ofsted inspections. This policy objective can only be met if schools are held more accountable for the progress of all their pupils – if these measures were imposed on Local Authorities but not schools, we would regard this as an unacceptable burden and a recipe for policy failure. We are concerned that the recent DCSF note<sup>7</sup> on the future development of the achievement and attainment tables makes no reference to the DSO3 indicators.
6. Whatever the final content of the NIS, we propose that a single national working group comprising Government and LA representatives be established, to develop new PIs, agree definitional changes to existing PIs, and oversee data collection procedures. This should replace any existing reference groups, and should have a connection with the DCSF Information Standards Board. This model has worked well in the DoH, where SIGASC (formerly the Technical Working Group) carries out these functions for adult PAF indicators.

### **C. Detailed Commentary and Recommendations**

A commentary on each PI and a recommendation as to its inclusion in the NIS is set out below. As might be expected from an initiative whose focus is on reducing the burdens on Local Authorities, we are proposing the deletion or replacement of over half the indicators in the set, but we believe that there is potential for DCSF to work with Local Authorities to develop better indicators in the case of the Staying Safe/DSO2 area, and possibly more indicators in the Positive Contribution/DSO6 area.

Yours sincerely,

John Coughlan  
Director Children's services  
Hampshire County Council  
Member of the Lifting the Burdens Task Force

Indicator/DSO	Indicator Name	Comments	LBTF Recommendation
DSO1 (Health and Wellbeing)	Operation of contact point - delivery goal	Does not help identify improved outcomes. It fails the test of causality. Govt can assure itself of progress on implementation of Contactpoint via other means than the NIS	Do not introduce into NIS
DSO1 (Health and Wellbeing)	Emotional Health and Wellbeing - CYP user perception	Inappropriate as a statutory PI – see General Comment 3	Do not introduce into NIS
DSO1 (Health and Wellbeing)	Psychological & emotional health & wellbeing- CAMHS provision	Not clear what the definition of this PI would be – if it is the current PAF A70, this is a delivery goal not an outcome measure. It deals with what is provided rather than what is needed. It also relies on self-assessment without any robust challenge	Replace with referral data which measures demand/need/met need/unmet need
DSO1 (Health and Wellbeing)	Uptake of school lunches - Delivery Goal (can be disaggregated by FSM/non-FSM)	Expensive and difficult to collect. Is not an outcome measure. However it has some value in creating leverage to improve children's health outcomes.	Keep
DSO1 (Health and Wellbeing)	Prevalence of smoking by children (CYP user perception)	Inappropriate as a statutory PI – see General Comment 3.	Do not introduce into NIS
DSO1 (Health and Wellbeing)	Breast feeding 6-8 wks from birth (TBC-if not feasible, fallback is breastfeeding initiation)	An outcome measure with value	Keep
DSO1 (Health and Wellbeing)	Percentage of schools accredited as healthy schools -delivery goal	This does not help identify improved outcomes. It fails the test of causality. Govt can assure itself of progress on implementation of Healthy Schools via other means than the NIS	Do not introduce into NIS
DSO1 (Health and Wellbeing)	Service provision for disabled children	This is a delivery measure not an outcome measure. It deals with what is provided rather than what is needed. It does not create any leverage to extend or develop services and provides no indicator of the quality of the service provided  At present there are no proposals for the definition of this PI	Substitute this with another better outcomes focussed measure
DSO1 (Health and Wellbeing)	Obesity in Children in Reception (local-level data)	Data may not capture children with high BMI, who may choose not to be measured. Also no consensus BMI is best measure. However it is an outcome measure and will have impact	Keep
DSO1 (Health and Wellbeing)	Child obesity at year 6 (local-level data)		

<b>DSO1 (Health and Wellbeing)</b>	% of 5-16 year olds doing at least 2 hrs high quality PE and school sport every week	Good proxy for an outcome measure	Keep
<b>DSO1 (Health and Wellbeing)</b>	% young people engaging in school sport for 2-3 hours beyond school day	Unclear what the data source for this would be. Covers the same general issue as the 2 hrs a week measure, and is therefore unnecessary	Do not introduce into NIS
<b>DSO1 (Health and Wellbeing)</b>	SEN - draft statements issued within 18 weeks (with and without exceptions)	These are process indicators that say nothing about outcomes for SEN pupils. This is not an indicator of Health and Wellbeing in any real sense. Including 26 wks does not add value. There should be an outcomes-focused indicator, possibly using a quartile/quintile approach based on APS at the end of each KS, which would sit better under DSO3. An indicator on immunisation could replace this measure	Replace with a measure that measures outcomes (ie attainment/progress)  Consider replacement indicator on immunisation
<b>DSO1 (Health and Wellbeing)</b>	SEN - final statements issued within 26 weeks (with & w/out exceptions)		
<b>DSO1 (Health and Wellbeing)</b>	Mental Health of Children in Care	Data source? Need an outcome measure that addresses whether children in care's mental health needs are well met	Do not introduce into NIS but link to indicator proposal about all children's psychological and emotional health and well-being (see above)
			<b>7 rejected, 4 to replace, 5 keep</b>
<b>DSO2 (Safeguarding young and vulnerable)</b>	Young runaways including missing children	Unclear what the data source would be. Not an outcome measure. Unclear how performance would be interpreted – good recording may produce a high number, which would presumably then be viewed negatively. Would have value as a local measure especially if CAA tested arrangements.	Do not introduce into NIS
<b>DSO2 (Safeguarding young and vulnerable)</b>	% of child protection cases which should have been reviewed during the year that were reviewed	Measures process not outcomes. Performance is already at 99% nationally – no evidence that there is a major problem that having this PI would address. Relatively poor proxy measure for establishing how safe children are	Need a replacement set of outcome measures for safeguarding

<b>DSO2 (Safeguarding young and vulnerable)</b>	% of referrals that go on to initial assessments	Process, rather than outcomes focused. This should be local MI, with possibly the option for GOs to raise concerns if it falls below a certain threshold.  Does not address outcome question – ie how many initial assessments result in services and improved outcomes – measure does not meet causality or coherence tests	
<b>DSO2 (Safeguarding young and vulnerable)</b>	Hospital admissions caused by unintentional and deliberate injuries	Outcome measure	Keep
<b>DSO2 (Safeguarding young and vulnerable)</b>	Initial assessments for children's social care carried out within 7 working days of referral	Not clear why this should be a statutory PI. Not outcomes focused. This should be local MI, with possibly the option for GOs to raise concerns if it falls below a certain threshold	Need a replacement set of outcome measures for safeguarding
<b>DSO2 (Safeguarding young and vulnerable)</b>	Duration of Child Protection Plan	This is a process measure not an outcome measure	
<b>DSO2 (Safeguarding young and vulnerable)</b>	Children becoming the subject of Child Protection plan for a second or subsequent time	Proxy outcome measure	Keep
<b>DSO2 (Safeguarding young and vulnerable)</b>	Percentage core assessments within 35 days	Process, rather than outcomes focused. This should be local MI, with possibly the option for GOs to raise concerns if it falls below a certain threshold.	Need a replacement set of outcome measures for safeguarding
<b>DSO2 (Safeguarding young and vulnerable)</b>	Number of children adopted as a percentage of LAC	Could create a perverse incentive to pursue adoption at the expense of other more appropriate legal options. What is more important is creating permanency and stability of placement over time, not the precise type of legal mechanism used	Do not introduce into NIS
<b>DSO2 (Safeguarding young and vulnerable)</b>	Proportion of looked after children experiencing 3 or more placement moves over the previous year	Reasonable	Keep one of two measures – preferably medium term stability not this short term stability
<b>DSO2 (Safeguarding young and vulnerable)</b>	The proportion of children under 16 who have been looked after for 2.5 or more years, who have been living in the same placement for at least the last 2 years		Keep one of two measures, preferably this medium term stability not short term stability
<b>DSO2 (Safeguarding young and vulnerable)</b>	Preventable child deaths as recorded through child death review processes	Certainly fits the 4 c's – and is an outcome measure of sorts	Keep

<b>DSO2 (Safeguarding young and vulnerable)</b>	Percentage of children who have experienced bullying (CYP user perception)	Inappropriate as a statutory PI – see General Comment 3	Do not introduce into NIS
			<b>4 rejected, 4 to keep, 5 to replace</b>
<b>DSO3 (Close the gap in educational attainment)</b>	Number of Children's centres - delivery goal	This is a delivery goal not an outcome measure. It deals with what is provided rather than what is needed. Govt can assure itself of progress on implementation of Children's Centres via other means than the NIS	Do not introduce into NIS
<b>DSO3 (Close the gap in educational attainment)</b>	Take-up of formal childcare by low-income families - delivery goal	More precise definition needed, a better measure also measures choice	Replace with more effective measure
<b>DSO3 (Close the gap in educational attainment)</b>	Narrowing the gap at Early Years Foundation Stage (child development at age 5)	Reasonable measure	Keep
<b>DSO3 (Close the gap in educational attainment)</b>	Key Stage 2 BME attainment	Which subjects / measures would these indicators cover? If English, Maths and Science, this would be 8 or 9 PIs, not 3. The attainment of all children in an LA area needs to be understood by gender, socio-economic status, ethnicity etc, but the big variations in ethnic profiles across LAs means that comparability would be an issue at national level. In many areas the biggest under attaining group are white working-class boys. Would be better left as discretionary local level indicator if it is appropriate to the area, with progress tested via CAA	Do not introduce into NIS
<b>DSO3 (Close the gap in educational attainment)</b>	Key Stage 3 BME attainment		
<b>DSO3 (Close the gap in educational attainment)</b>	Key Stage 4 BME attainment		
<b>DSO3 (Close the gap in educational attainment)</b>	Proportions progressing by 2 levels in English at KS 1-2	Clarity is needed as to definitions. Would a Value Added or points progress measure be more appropriate?	Keep and add to school Performance Tables
<b>DSO3 (Close the gap in educational attainment)</b>	Proportions progressing by 2 levels in English at KS 2-3	Clarity is needed as to definitions. Would a Value Added or points progress measure be more appropriate? Would the KS2-3 measure be to L5 or L6?	
<b>DSO3 (Close the gap in educational attainment)</b>	Proportions progressing by 2 levels in English at KS 3-4	Clarity is needed as to definitions. Would a Value Added or points progress measure be more appropriate? How would the KS3-4 measure work in terms of 'levels'?	
<b>DSO3 (Close the gap in educational attainment)</b>	Proportions progressing by 2 levels in Maths at KS 1-2	Clarity is needed as to definitions. Would a Value Added or points progress measure be more appropriate?	

DSO3 (Close the gap in educational attainment)	Proportions progressing by 2 levels in Maths at KS2-3	Clarity is needed as to definitions. Would a Value Added or points progress measure be more appropriate? Would the KS2-3 measure be to L5 or L6?	
DSO3 (Close the gap in educational attainment)	Proportions progressing by 2 levels in Maths at KS3-4	Clarity is needed as to definitions. Would a Value Added or points progress measure be more appropriate? How would the KS3-4 measure work in terms of 'levels'?	
DSO3 (Close the gap in educational attainment)	Narrowing the FSM/non-FSM gap at Key Stage 2 and 4	Clarity is needed as to definitions. Are there specific subjects in mind here? Is this by reference to thresholds or CVA?	Keep
DSO3 (Close the gap in educational attainment)	Children in care threshold target at Key Stage 2	The CLG list suggests progress measures for LAC. Why have these been dropped?	Replace with progression measure
DSO3 (Close the gap in educational attainment)	Children in care threshold target at Key Stage 4		
DSO3 (Close the gap in educational attainment)	Inequality gap reduction in attainment at 19 level 2	Could use SOA and progression as in foundation stage measure	Keep
DSO3 (Close the gap in educational attainment)	Inequality gap reduction in attainment at 19 level 3		
DSO3 (Close the gap in educational attainment)	Widening participation in HE - increasing % of young entrants from low income backgrounds (tbc)	This is at the limits of the LA's sphere of real influence	Introduce into NIS, but with clear expectation on LSC's.
			<b>4 rejected, 3 to replace, 10 to keep</b>
DSO4 (Continue to raise standards)	Number of extended schools - delivery goal	This is a delivery goal not an outcome measure. It deals with what is provided rather than what is needed. Govt can assure itself of progress on implementation of Extended Schools via other means than the NIS	Do not introduce into NIS
DSO4 (Continue to raise standards)	Self governing schools (Academies, Trust Schools, VA Schools, Foundation Schools) - delivery goal	This is a delivery goal not an outcome measure. It deals with what is provided rather than what is needed. Govt can assure itself of progress on implementation of its diversity agenda via other means than the NIS. As the final decisions on this rest with governing bodies and DCSF, this is inappropriate as a PI for Local Authorities	Do not introduce into NIS
DSO4 (Continue to raise standards)	Play	Not easily definable or available. Not clear how it would be collected	Do not introduce into NIS
DSO4 (Continue to raise standards)	Schools in special measures	Does not measure outcomes per se, but is a process	Keep

		measure that can impact on outcomes	
<b>DSO4 (Continue to raise standards)</b>	Early Years Foundation Stage threshold (child development at age 5)	Outcome measures	Keep
<b>DSO4 (Continue to raise standards)</b>	Key Stage 2 English and Maths threshold		
<b>DSO4 (Continue to raise standards)</b>	Key Stage 3 English and Maths threshold		
<b>DSO4 (Continue to raise standards)</b>	Key stage 3 science (proportion of pupils at level 5 (or 6))		
<b>DSO4 (Continue to raise standards)</b>	Key Stage 4 threshold - 5+ A*-C GCSEs (or equivalent) inc. GCSE English and Maths		
<b>DSO4 (Continue to raise standards)</b>	Key Stage 4 science (% achieving 2 or more A*-C GCSEs)	Should only be in NIS when it is incorporated into schools performance tables	Introduce into NIS when it is in performance tables
<b>DSO4 (Continue to raise standards)</b>	Number of schools judged as having inadequate standards of behaviour	See comment on permanent exclusions	Do not introduce into NIS
<b>DSO4 (Continue to raise standards)</b>	Number of schools judged as having satisfactory standards of behaviour		
<b>DSO4 (Continue to raise standards)</b>	Number of persistent absentee pupils (missing 20% or more of school year) - primary	This is the only school attendance measure being proposed, and the educational rationale for it is weak. Focusing solely on particular thresholds or categories of absence has the potential to undermine the integrity of school attendance registers. BV45 and 46 should be retained, and consider a similar total absence measure for special schools	Replace with BV45 and 46
<b>DSO4 (Continue to raise standards)</b>	Number of persistent absentee pupils (missing 20% or more of school year) - secondary		
<b>DSO4 (Continue to raise standards)</b>	Key Stage 2 floor target - English	These measures are unnecessary given the combination of threshold and progress measures being proposed for the NIS. LAs will no doubt use similar measures to inform their own local categorisations of schools causing concern, but this should be for local discretion	Do not introduce into NIS
<b>DSO4 (Continue to raise standards)</b>	Key Stage 2 floor target - Maths		
<b>DSO4 (Continue to raise standards)</b>	Key Stage 3 floor target - English		
<b>DSO4 (Continue to raise standards)</b>	Key Stage 3 floor target - Maths		
<b>DSO4 (Continue to raise standards)</b>	Key Stage 4 floor target, 5 A*-C (incl English and Maths)		
			<b>12 rejected, 2 to replace, 7 to keep</b>
<b>DSO5 (Increase post-16 educ/training)</b>	14-19 Learning Diplomas - delivery goal	This is a delivery goal not an outcome measure. It deals with what is provided rather than what is needed. Govt can assure itself of progress on implementation of Diplomas via other means than the NIS	Do not introduce into NIS
<b>DSO5 (Increase post-16 educ/training)</b>	Post-16 participation in physical sciences (A level physics, chemistry and maths)	Rationale needed. Focus solely on A Levels seems out of date. Should only be in NIS when it is in the post-16	Do not introduce into NIS

		achievement and attainment tables	
<b>DSO5 (Increase post-16 educ/training)</b>	% 17 year olds in education or training	Currently data is only available up to 2005. The time lag on the availability of figures means that this measure is inappropriate for the NIS	Do not introduce into NIS
<b>DSO5 (Increase post-16 educ/training)</b>	Level 2 attainment at 19	Outcome measures	Keep
<b>DSO5 (Increase post-16 educ/training)</b>	Level 3 attainment at 19		
			<b>3 rejected, 2 to keep</b>
<b>DSO6 (Increase the number of CYP on path to success)</b>	Satisfaction with transport (CYP user perception)	Inappropriate as a statutory PI – see General Comment 3.	Do not introduce into NIS
<b>DSO6 (Increase the number of CYP on path to success)</b>	Under 18 conception rate	Outcome measure	Keep
<b>DSO6 (Increase the number of CYP on path to success)</b>	STIs	Definitions problematic but it is an outcome measure	Keep
<b>DSO6 (Increase the number of CYP on path to success)</b>	Participation in Positive Activities (CCIS data)	Not clear whether this data would be robust enough to produce comparable PIs nationally. It is not an outcome indicator. If the policy intent behind PAYP were being realised, it would show its effect in other PIs – offending, ASB etc. Should be removed	Do not introduce into NIS
<b>DSO6 (Increase the number of CYP on path to success)</b>	Youth Service Accredited outcomes	DCSF should consider this in the light of the move towards targeted youth support services – is this the appropriate measure?	Do not introduce into NIS without a clearer rationale
<b>DSO6 (Increase the number of CYP on path to success)</b>	Rate of permanent exclusions	This measure is susceptible to variable recording practices across LAs. Fixed term exclusions (% of fixed term exclusions in relation to number of pupils in relevant phase) should replace this measure, and the Ofsted behaviour judgements dropped	Replace with fixed term exclusions
<b>DSO6 (Increase the number of CYP on path to success)</b>	Reducing the number of first time entrants to the YJS aged 10 -17	Outcome measure	Keep
<b>DSO6 (Increase the number of CYP on path to success)</b>	Harm arising from young people's drugs / substance misuse (including alcohol consumption)	If the indicator is actually the proportion in treatment, it should be renamed, as it is not an indicator of 'harm caused'. The treatment indicator could penalise LAs where a	Do not introduce into NIS

		preventative approach has had success, and which may therefore not need to treat so many YP. Also disingenuous as its actually a basket of 3 measures	
<b>DSO6 (Increase the number of CYP on path to success)</b>	Vulnerable groups NEET	Consideration should be given to how figures for care leavers are sourced from this data, as it may not be reliable as an indicator of the YP the LA has a responsibility to under the CL Act 2000  This is several indicators not 1	Keep
<b>DSO6 (Increase the number of CYP on path to success)</b>	16-18 year-olds NEET	Outcome measure	Keep
<b>DSO6 (Increase the number of CYP on path to success)</b>	No. of young people whose situation is not known	Relates to above	Keep
			<b>4 rejected, 6 to keep</b>

# Appendix D

## LBTf response to the NIS consultation 21 December 2007

### General Comments on children and young people indicators

Our submission on the children and young people's indicators has been drawn from two workshops for councils on 3 and 4 December – attended by around 100 individuals from a range of councils across the country covering policy and performance, research and service specialisms. In addition, we have consulted with our Policy Associate network and drawn upon responses received through the LGA's "adviser" contacts, their monthly improvement newsletter, the County Council's Network and the IDeA's policy and performance online community of practice to produce as truly a representative and comprehensive response from the sector in the short time available.

An important question with regard to the NIS from the children and young people's services angle is whether the NIs really help local authorities, partners and Government understand what needs improvement in children and young people's services and why? Around many of the NIs at present, there remains concern that the indicators will not serve their purpose. There remains an imbalance of attention across the 5 Every Child Matters outcome areas and there is a lack of coherence between NIs at the top level and 'digging deeper' into improvement and development linkages – inputs, processes, outputs and outcomes.

There are major ongoing issues with a lack of clarity in definitions (for specifics see comments against individual indicators in the templates available at: <http://www.lga.gov.uk/lga/core/page.do?pagelid=105317> ).

There remains confusion about the picture on data collection and PIs going forward. The view is that DCSF is still expecting local authorities to collect OC2 and 903 returns, for example. Government has made a clear commitment to reduce burdens on the public sector generally and local government in particular, and should

follow this through by challenging routine data returns which go beyond the NIS. There is positive and keen interest from councils to take a lead in working with Government to make the 2010 pledge to reduce data requirement burdens by 30% a reality. This means determining what the baseline currently is, as well as a review of what data is collected and for what purposes.

The PAF indicators for children and adults saw continuing evolution to improve them, so we should recognise that indicators, particularly where new, may need further work and that we will learn from their practical use.

Further on the evolution of PAF, there were previously bandings for these indicators. How will interpretation of new PIs be provided?

We need to be careful with the methodology of perception surveys which sit behind a number of the NIs. Sample sizes and coverage need to be sufficiently robust to hold credence. Of particular significance to children and young people's services is the Tellus2 survey by Ofsted. On the one hand sample size can be small; schools can opt out of completion; some groups of C&YP may well be severely under-represented and sampling skewed as schools self select; given data gets aggregated it has limited use in communicating to an authority what needs to happen in particular neighbourhoods/around particular schools in the area; there will not be postcode level detail. On the other hand, Tellus2 results can complement Audit Commission Quality of Life survey data and there is a feeling that if local authorities could have an input to survey design and questions, it could potentially be an extremely powerful tool.

Recognising these difficulties with Tellus2 as a tool, we think that the indicators generated by this survey, as with the measures of perception gathered through the place survey, should be treated as diagnostic rather than performance measures.

### Most problematic indicators

NI 52	Take up of school lunches	Delete. This does not clearly measure the outcome and there are already indicators for obesity and participation in sport.
NI 70	Hospital admissions caused by unintentional and deliberate injuries to children and young people	Needs revision to focus on the right outcome. At the moment measures both deliberate and accidental injuries so does not produce useful information.
NI115	Substance misuse by young people	Delete. Although this might be useful information for the council or LSP to collect and use, it should not be a performance indicator as it is based on a small, self-reported sample and so is unlikely to be reliable. The school setting for the interview may further worsen reliability.
NI 116	Proportion of children in poverty	This measure should be based on the national measure of children in poverty broken down to local authority level.

In addition the following indicators are simple counts which form part of the contextual information for local service planning and we question whether they need to be included in the NIS:

NI 88	Number of extended schools
NI 89	Number of schools in special measures
NI 109	Number of sure start children's centres



