

Taking stock – where next with sector-led improvement?

Consultation results

January - March 2015



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Summary

Introduction

Sector-led improvement is the approach to improvement put in place by local authorities (including fire and rescue authorities) and the Local Government Association (LGA) following the abolition of the previous national performance framework. It is based on the fundamental principles that local authorities are responsible for their own performance and are accountable for it locally (not nationally), and that the role of the LGA is to support the sector.

This consultation asked local authorities and key stakeholders for their views on whether the current approach is the right one for the future or whether any changes are needed, in order to inform how the approach and offer should develop.

Methodology

The consultation was launched on 20 January and closed on 20 March 2015. All leaders, chief executives, chief fire officers and members with lead responsibility for fire were sent their own unique link to an online response form. A total of 160 responses were received, covering 37 per cent of local authorities.

Additionally, the consultation was sent to a wide range of national and regional stakeholders with an interest in the future of sector-led improvement and the LGA's support offer to the sector. A total of 41 additional responses were submitted, from a range of stakeholders including regional groups, the Society of Local Authority Chief Executives and Senior Managers (Solace), the Chief Fire Officers Association (CFOA) and the Secretary of State for Communities and Local Government.

Taking into account the organisational responses from regional groupings, 65 per cent of authorities were covered by the responses received.

Sector-led improvement principles

All consultation respondents were asked to consider whether, given the current and future challenges facing the sector, the principles of sector-led improvement were still the right ones. Almost all respondents supported the principles either as they were or with some modifications. Forty four per cent of chief executives and leaders¹ who responded answered that the principles were still relevant exactly as they were, whilst 54 per cent said that the principles were generally relevant, but suggested some changes.

These suggestions tended to fall under the following main themes:

- The importance of **partnership working, place based outcomes** and local authorities' ability to lead on cross-agency and cross-boundary working with partners and the community was most commonly mentioned.
- Acknowledgement of the legitimate interest of central government in the sector, and clarification of **what the sector sees as government's role in improvement**.

¹ References in the report to 'chief executives and leaders' incorporate chief executives, leaders, chief fire officers and members with lead responsibility for fire.

- Inclusion of **financial resilience**, in acknowledgement of the financial reductions and concerns that local authorities are experiencing.
- Address **responding to poor performance** and early identification of and support for local authorities reaching a tipping-point/in danger of failing.
- The need for **sector-led improvement to be flexible and continue to evolve**.

Place based approach

Respondents were asked how the increasing role that local authorities play in working with other parts of the public sector on a place-based approach should be reflected in sector-led improvement. Suggestions included:

- **Peer challenges should be run with the involvement of partner agencies.** For example having peers from other organisations on challenge teams, adding an element looking at collaborative working, partnership structures and governance to the challenge itself and running thematic or place based reviews that look at all relevant partners.
- **Embed and improve partnership working more broadly within sector-led improvement principles**, reflecting the sector's unique place shaping role. Suggestions included widening the groups traditionally referred to as partners, and seeking ways to ensure better engagement with these partners.

Local accountability

Respondents were asked whether there was more that all councils should do to strengthen local accountability in their areas, and if so what should be done. Whilst some respondents felt that local authorities were already accountable and actively strengthen accountability through existing mechanisms and the publication of data, many felt that more could be done. There were a number of key themes that emerged, many of which were overlapping:

- The importance of **communication** with residents, partners and stakeholders; the quality and accessibility of that communication and the role that **social media** and other related mechanisms such as webcasting of meetings can play.
- **Transparency** as part of the **open data** agenda, as well as a basic principle, and the role that it can play in accountability was another key theme.
- Another was that of **public and community engagement**, with communication, accessibility of information and transparency considered to be the mechanisms by which engagement can be achieved. A small number of respondents also highlighted the importance of making engagement robust, using locally appropriate mechanisms such as area forums, co-design of services or meaningful consultation on key policies.
- A small number of respondents mentioned that it **can be difficult to engage residents** when there is not a specific 'live issue' that they are interested in.
- Some respondents voiced their concern over the possibility of an imposed or top-down model for accountability, noting that local authorities required unique, **individual approaches to accountability**. However, support from national bodies such as the LGA was considered a valuable resource.

Performance data

Respondents were asked whether councils or the LGA need to do any more to ensure that local people and others have the comparative performance data they need to hold councils to account, and if so what should be done. Some respondents felt that

there was no need to do more, because local authorities already make a wide range of data available and LG Inform already fulfils this function.

Others felt that no more needs to be done on this because different local authority models, priorities and circumstances as well as data issues mean there is limited value in comparing data. The majority of respondents, however, thought this was an area that would warrant improvement. Key themes were:

- **Accessibility** of data, covering both the way in which data is presented and broken down as well as how easy it is to find on an authority's website. Several respondents also commented that data needs to be accompanied by context and explanation to ensure it is interpreted correctly and is meaningful to residents.
- **Comparability** of data - with this being challenging due to inconsistencies in some data collections and differences between local authorities. The ability to compare 'like with like' was seen as essential.
- **Consistency** in the presentation and availability of data, with a suggestion that the LGA should play a role in brokering agreement across the sector on data standards and formats.
- A small number of respondents suggested agreeing a small set of key performance indicators for the sector, however some respondents **questioned the role of benchmarking performance data as a way of enabling local accountability** more generally, with some questioning whether there is really demand from residents for this type of information. It is worth noting that many of these respondents felt that benchmarking is useful for improvement, individual services, councillors and government, just that it may not be the most effective tool for local accountability.

Scrutiny

Respondents were asked whether there is anything more that needs to be done to help councillors exercise effective scrutiny. There were two main themes:

- **Training** was identified by around a third of the respondents who provided an answer for this question. This included an improvement to the training available and provision of **guidance materials**, as well as more specific areas, for example training in **how to challenge**. Some noted that there was a certain level of apathy towards engaging in training.
- **Best practice** examples and the dissemination of this was the second theme most commonly cited by respondents.
- Within the range of answers there was reference to several other issues. Some respondents mentioned issues associated with a **large political majority** and the impact of different democratic structures. Another issue mentioned was around the need for **culture change**, for local authorities to value scrutiny and demonstrate that real change can take place as a result. **Community engagement** was also identified by some respondents as critical to effective scrutiny within local authorities.

Peer challenge

Respondents were asked whether they had any views on the core components of peer challenge. Responses were generally supportive of the format of peer challenge, including the core components, but a number of suggestions were made in terms of what works well or how they could be improved. Four broad themes emerged from the analysis:

- Much of the response data concerned the **balance between consistency and flexibility**. While there was recognition that the core elements of peer challenge enabled a level of consistency across the sector and many commenters felt standardisation was important, a view that was common among respondents was that the flexibility to also shape the challenge around local need enabled them to maximise their value. In some cases there were suggestions that peer challenges could be more flexible than they currently are. However, in their response, Solace signalled that peer challenge should be less driven by local choice.
- Echoing comments that respondents gave on the principles of sector-led improvement, a very common view from respondents was around the need for peer challenges to reflect an increased focus **on local partnerships and community leadership**, and the need to apply the core components to areas as opposed to just local authorities.
- The current core focus on priority setting, leadership, capacity, corporate governance and financial resilience was very popular among respondents, but a number felt various other aspects were important or should be included. One of the most common areas of interest was around **engagement with and accountability to local people**.
- Another common theme emerging was around the inclusion of **performance management** within the core components, with some respondents also highlighting related issues around priority setting and a focus on outcomes.

Respondents were asked whether, in their view, all authorities should be expected to have a corporate peer challenge on a regular basis, for example every four years. The majority of respondents stated that this should be the case, with 72 per cent of chief executives and leaders who responded saying that they agreed.

The consultation then asked whether all corporate peer challenge reports should be published. Views on this were more mixed, with 47 per cent of chief executives and leaders saying that all should be published, whilst 32 per cent agreed that this should be the case, unless there are exceptional circumstances. The least frequently selected option was that this should be a matter of local choice (21 per cent of chief executives and leaders).

Looking at whether authorities should be expected to produce an action plan following a peer challenge, the majority of respondents agreed that authorities should be expected to do this (82 per cent of chief executives and leaders said this).

Government inspection

Respondents were asked whether there was anything else that should be done to limit government's appetite for inspection. A large number of the responses reiterated their support for sector-led improvement and peer challenge, and other common responses are outlined below.

- By far the most common general response was that it was important to **demonstrate the benefits of sector-led improvement compared to central inspection**. This could be done by providing evidence that sector-led improvement is working and that local government has in place a regime that can ensure continued improvement. Through this evidence base, local government would be able to provide assurance to central government.
- A number of responses focussed on the **cost of the previous centrally-led inspection regime**, compared to the current sector-led system, making the case that the former was more expensive.

- There were, however, a number of responses that did suggest **there was a place for inspections**. None of these responses suggested that sector-led improvement should be replaced by a central government led system, but that there were circumstances where an inspection would be appropriate. This was normally where it was clear that sector-led improvement had not achieved the desired result, perhaps where an authority had failed to engage with the voluntary arrangements. Some respondents pointed out that it was important to make it clear exactly when inspection would be appropriate.
- Another theme emerging from the responses was that government's appetite for inspection would be limited if the sector-led improvement arrangements, such as peer challenge, **should become mandatory or expected** to some degree. This issue is covered in detail in the section on peer challenge in the main body of the report.
- More common than suggestions that sector-led improvement arrangements should become mandatory, was the idea that **sector-led improvement should be more robust** in various ways. A number of commenters felt that the LGA and the sector should be more proactive in identifying and intervening where problems are emerging, and demonstrating a clear and planned approach to how underperformance will be identified and addressed.
- One theme that emerged, which was less common but still substantial, was that government's appetite for inspection could be limited if the local government sector were to become **more transparent**. This included publishing peer challenge reports and performance data as well as transparency more generally.

Improvement support

Respondents were asked what changes they would like to see from the LGA's improvement offer. The most common answer given was that no changes are needed, however other respondents did have a range of comments and suggestions, and these were diverse with no particularly strong themes emerging. The most common suggestions covered the following areas:

- Some respondents asked for more **examples of notable practice and innovation**, and **sharing of learning**.
- A small number of respondents took the opportunity to make further comments about **peer challenge**. These covered the importance of ensuring a consistently high quality of peer challenge team members (including sufficient training), the need to widen the available pool of peers, and the need to improve follow up after peer challenges.

Children's services

Respondents were asked whether, in their view, there is a continued need for the inspection of services that protect and care for children and young people. Respondents were strongly in agreement that there is a continued need for this, with 94 per cent of chief executives and leaders from single and upper tier authorities who responded answering 'yes'.

Those respondents who answered that there is a continued need for the inspection of services that protect and care for children and young people were asked whether they thought that this inspection should be carried out by Ofsted. Views on this were varied, including a high proportion of respondents answering 'don't know' (24 per cent of chief executives and leaders who responded from single and upper tier authorities). Views amongst those that expressed an opinion were somewhat split, although with a slightly higher proportion answering that this inspection should be carried out by Ofsted (45 per cent) than that it should not (30 per cent).

All respondents were then asked whether, in their view, there is a continued need for the inspection of councils' school improvement services. Just under two thirds (62 per cent) of chief executives and leaders who responded from upper and single tier councils said that they did think that there was a continued need for this, whilst 31 per cent said that there was not. Seven per cent of this group answered 'don't know'.

Those respondents who answered that there was a continued need for the inspection of councils' school improvement services were asked whether this inspection should be carried out by Ofsted. Just over half (53 per cent) of chief executives and leaders who responded from upper and single tier councils said that this inspection should be carried out by Ofsted, with the remainder of this group split between those who said that inspection of councils school improvement services should not be carried out by Ofsted (26 per cent) and those who answered 'don't know' – 21 per cent.

All respondents were asked whether separate inspections of agencies contributing to the protection and care of children, such as councils, health and the police, should be replaced by a single inspection of services across all agencies in an area. The majority of respondents were in favour of this, with 80 per cent of chief executives and leaders who responded from upper and single tier councils answering 'yes'.

Respondents were then asked, if a new multi-agency inspection for the protection and care of children was developed, whether it should be delivered through Ofsted, another existing inspectorate or a new inspectorate. The most popular response was a new inspectorate (50 per cent of chief executives and leaders who responded from upper and single tier councils selected this option), followed by Ofsted (23 per cent of this group). Just two per cent of this group thought that any new multi-agency inspection should be run by an existing inspectorate other than Ofsted.

Further support for children's services

Respondents were asked if councils need further support, such as bespoke models of peer review for child sexual exploitation (CSE) or schools improvement, to meet the challenges faced in children's services. If 'yes', respondents were asked to provide further details (some respondents who said 'no' also explained their response). Overall, there were almost four times as many comments in favour of additional support than for no additional support.

Broadly, those in favour of further support referred to the following topics:

- **Specific issues of child safety (or 'wicked problems')** such as CSE, child trafficking and radicalisation. Some respondents spoke about the sector needing to "sort out" its priority issues (e.g. child safeguarding), and "learn the lessons" from recent high-profile cases. Examples of potential support included dedicated work on tackling CSE, a more robust framework to identify and manage risk, improved cross local authority working, increased funding to strengthen provision, greater sharing of best practice, and peer-support such as a CSE-specialist team of peer reviewers.
- Other respondents said a **wider remit** for further support was needed. Any support offer, they said, should be extendable or adaptable to whatever challenges arose, or even linked to areas of service/performance rather than topical issues.
- Some respondents said **school improvement** support would be helpful, but they also highlighted the changing context of the school sector, for example, conflicting accountabilities.
- Some respondents said **bespoke support** was important. This could include support for specific services, council staff, elected members and statutory boards.

- Some respondents also referred to support for work on **special educational needs and disabilities (SEND)**.

Several respondents, including ADCS, referred to the ways in which support might be provided. They spoke in favour of support, but qualified their comments in relation to the following conditions. They said further support should:

- have a multi-agency lens
- be included in the current arrangements
- be flexible and proportionate
- serve as a positive process
- use high quality peers
- be sufficiently resourced.

Other respondents referred to specific tools which they said would prove helpful. These included an LGA performance checklist, a brokerage service for providing specific support from 'outstanding' authorities, sector mentors, ring-fenced budgets, and a focus on prevention. A number of respondents also spoke about receiving support via sharing of best practice and innovation.

Broadly, those respondents opposing further support, of which there were far fewer than the above, spoke about these issues:

- **The current system works well.** These respondents said the current inspection regime was robust, and that Ofsted provided a range of tools and good practice reports. The sector-led improvement peer review process was also said to be operating well.
- **Focus on intelligence sharing as a form of support.** Some respondents said there should be a greater emphasis, and more honest sharing, of what works and what doesn't work in children's services.

Adult social services and health

Respondents were asked if they had anything to say about the arrangements and support put in place to help councils and their partners implement changes across adult social care and health programmes. Around half of respondents provided a response to this question.

About a quarter of those who responded said they welcomed sector-led improvement work in health and adult social care and/or that it was working well for them. For example, they said the process was "outcomes focused", helped to identify "what 'good' looks like", and ensured that the "customer experience was at the heart of the model".

A number of respondents listed the benefits of sector-led improvement work across adults and health programmes, which included highlighting areas of existing good practice and areas requiring greater focus, raising awareness of national concerns, confirmation from the sector that services were being well-delivered, sharing of experiences, benchmarking assistance, development of solutions – and generally driving improvement. Some expressed their ongoing committed to the current arrangement and support in place across adults and health programmes.

In their commentary, however, about a quarter of those responding highlighted the need for better integration between adults and health programmes – and also the need for a place-

based approach. Other comments included the need for a multi-agency inspection regime, joint leadership across the NHS and public health, and training (such as training for NHS staff about local government workings).

A number of respondents spoke, both positively and negatively, about the LGA's grant-funded programmes, namely Better Care Fund, Care Act 2014, the Winterbourne View Joint Improvement Programme (now known as Transforming Care) and Towards Excellence in Adult Social Care (TEASC). While some praised the LGA's grant-funded programmes in supporting changes across adults' services and health, criticisms were also raised. For example although Solace commended some of the features of the LGA's grant-funded programmes, it also urged the LGA not to allow these programmes to be excessively dominated by the needs of the government department funding them. A number of positive suggestions were made around possible future support, and these are outlined in the main body of the report.

Introduction

Sector-led improvement is the approach to improvement put in place by local authorities (including fire and rescue authorities) and the Local Government Association (LGA) following the abolition of the previous national performance framework. It is based on the fundamental principles that local authorities are responsible for their own performance and are accountable for it locally (not nationally), and that the role of the LGA is to support the sector.

It is now over four years since the LGA launched 'Taking the lead', setting out the approach to sector-led improvement and the LGA's support offer. Over that time a lot has changed. We have the experience of providing a wide range of support²; we have the lessons from the comprehensive evaluation³ and the policy and financial context within which local authorities work is becoming clearer, if no less challenging.

This consultation therefore took the opportunity to 'take stock', asking local authorities and key stakeholders for their views on whether the current approach was the right one for the future or whether any changes were needed, in order to inform how the approach and offer should develop.

Methodology

The consultation was launched on 20 January and closed on 20 March 2015. All leaders, chief executives, chief fire officers and members with lead responsibility for fire were sent their own unique link to an online response form. A total of 160 responses were received, covering 37 per cent of local authorities.

This is a good response rate for an exercise of this kind. Whilst these results should strictly be taken as a snapshot of the views of this particular group of respondents rather than representative of the whole sector, this level of response combined with the wide range of organisational responses received (outlined in more detail below Table 3) mean that the results are likely to provide a good indication of the position of the sector more widely. Taking into account the organisational responses from regional groupings, 65 per cent of authorities were covered by the responses received. The tables below describe the characteristics of those who responded.

At an individual level, 160 responses represent 20 per cent of those who were sent a link. A breakdown of response rate by role is shown in Table 1, which shows a higher response from chief executives; however it should be noted that a number of responses, although submitted in the name of one individual, were signed off by the lead member and chief officer.⁴

² http://www.local.gov.uk/sector-led-improvement/-/journal_content/56/10180/6646010/ARTICLE

³ http://www.local.gov.uk/web/guest/research-performance-and-improvement/-/journal_content/56/10180/6197808/ARTICLE

⁴ References in the report to 'chief executives and leaders' incorporate chief executives, leaders, chief fire officers and members with lead responsibility for fire.

Table 1: Response breakdown by role			
	Respondents	Total in sample⁵	Response rate (%)
Chief executive	108	349	31
Leader	39	353	11
Chief fire officer	8	46	17
Lead member for fire	5	46	11
Total	160	794	20

Table 2 looks at the coverage of individual councils and fire and rescue authorities. It shows from how many local authorities at least one response was received, broken down by type of authority. There was some variation in the level of response by authority type, with the highest response rate coming from county councils (63 per cent), and the lowest level of response coming from fire and rescue authorities. However it is worth noting that, as outlined below, an organisational response was received from the Chief Fire Officers Association.

Table 2: Response breakdown by type			
	No. authorities for which at least one response received	All authorities	Response rate (%)
Shire county	17	27	63
Shire district	56	201	28
English unitary	32	56	57
Metropolitan district	21	36	58
London borough	10	33	30
Fire and rescue	11	46	24
Total	147	399	37

Table 3 shows from how many local authorities at least one response was received, broken down by region. Again, some variation is apparent, with the highest response rate from Yorkshire and the Humber (58 per cent) and the lowest from the East Midlands (22 per cent) and London (29 per cent). However again, it is worth noting that organisational responses were received from groups representing both these regions; the full list of additional responses is outlined below Table 3.

Table 3: Response breakdown by region			
	No. authorities for which at least one response received	All authorities	Response rate (%)
East Midlands	11	50	22
East of England	18	58	31
London	10	34	29
North East	7	16	44
North West	20	46	43
South East	32	83	39
South West	17	48	35
West Midlands	17	38	45
Yorkshire and the Humber	15	26	58
Total	147	399	37

⁵ The number of chief executives in the sample differs from the number of leaders as some authorities share one chief executive and in other authorities two chief executives job share, and in that case both were invited to respond.

Of the 147 authorities from which at least one response was received, 62 per cent had undergone a corporate or fire peer challenge since 2011 or have been in talks with the LGA about having one, whilst 38 per cent had not.

Additionally, the consultation was sent to a wide range of national and regional stakeholders with an interest in the future of sector-led improvement and the LGA's support offer to the sector. A total of 41 additional responses were submitted from this group, from a range of stakeholders including:

- Local authority officers
- Councillors
- National Audit Office (NAO)
- Association of North East Councils
- Society of Local Authority Chief Executives and Senior Managers (Solace)
- London Councils
- West Midlands Association of Directors of Children's Services
- Improvement and Efficiency West Midlands
- Secretary of State for Communities and Local Government
- East of England LGA Improvement and Efficiency Panel
- East Midlands Councils
- Committee on Standards in Public Life
- Chartered Institute of Public Finance and Accountancy (CIPFA)
- Centre for Public Scrutiny (CfPS)
- Chief Fire Officers Association (CFOA)
- Association of Directors of Public Health (ADPH)
- Association of Directors of Children's Services (ADCS)
- A private sector company that works with local government

Please note the following when reading the report:

- Where tables and figures report the base, the description refers to the group of people who were asked the question. The number provided refers to the number who answered each question. Please note that bases vary throughout the report.
- Throughout the report percentages in figures and tables may add to more than 100 per cent due to rounding.
- The following conventions are used in tables: '**' - less than 0.5 per cent; '0' – no observations; '-' – category not applicable/data not available.
- It is not possible to break responses down regionally as the sample size in each region would be too small to draw meaningful conclusions.
- References in the report to 'chief executives and leaders' incorporate chief executives, leaders, chief fire officers and members with lead responsibility for fire. References to 'all consultation responses' incorporate chief executives and leaders plus all other consultation respondents.

- Responses are reported as given, including misperceptions and gaps in knowledge, as it is important to understand where these exist and tailor future communications accordingly.

Taking stock – where next with sector-led improvement?

This section outlines the full set of consultation results.

Key principles and future challenges

Sector-led improvement principles

The principles of sector-led improvement are:

- a. Councils are responsible for their own performance and improvement and for leading the delivery of improved outcomes for local people in their area.
- b. Councils are primarily accountable to local communities (not government or the inspectorates) and stronger accountability, through increased transparency, helps local people drive further improvement.
- c. Councils have a collective responsibility for the performance of the sector as a whole (evidenced by sharing best practice, offering member and officer peers, etc).
- d. The role of the LGA is to maintain an overview of the performance of the sector in order to identify potential performance challenges and opportunities – and to provide the tools and support to help councils take advantage of this approach.

All consultation respondents were asked to consider whether, given the current and future challenges facing the sector, the principles of sector-led improvement were still the right ones. Almost all respondents supported the principles either as they were or with some modifications. Forty four per cent of chief executives and leaders who responded and 43 per cent of the full sample answered that the principles were still relevant exactly as they were, whilst 54 per cent of chief executives and leaders and 56 per cent of the full sample answered that the principles were generally relevant, but suggested some changes. Their suggestions are laid out below Table 4.

Table 4: Given the current and future challenges facing the sector, are the principles on which sector-led improvement is based still the right ones?

	a) Chief executives and leaders	b) Full sample
	Per cent	Per cent
Yes, they are still all relevant exactly as they are	44	43
Yes they are generally relevant, but I suggest some changes	54	56
No, none of them are relevant now	1	1
Don't know	1	1
Total	100	100

Base: a) all chief executives and leaders (153 respondents) b) all consultation responses (188 responses)

Those respondents who suggested some changes to the principles on which sector-led improvement was based were asked what their additions or alternatives would be. These tended to fall within the following main themes:

- The introduction of a principle around the importance of **partnership working, place based outcomes** and local authorities' ability to lead on cross-agency and cross-

boundary working with partners and the community was most commonly mentioned. For example:

“The devolution of power from central government requires greater working across councils and other partners - a council's willingness and ability to do that needs to be part of any review to a greater extent than is currently the case.”

North West council

“We need a greater emphasis on a place based approach, local authorities' community leadership role and how the whole public sector works together to achieve shared aims.”

South East council

“I believe that sector-led improvement should be right across the public sector and should utilise the skills and the experience from right across those bodies.”

South West council

“Add that councils have a collective responsibility to their electorate to co-operate with other public sector bodies to maximise outcomes, minimise cost and increase transparency and simplicity for the citizen.”

East Midlands council

- Whilst many respondents mentioned key accountability to their communities, and felt that this should be emphasised, some respondents also felt that acknowledgement of the legitimate interest of central government in the sector should be noted within sector-led improvement principles, and they should **clarify what the sector sees as government's role in improvement**. For example:

“We agree that we have a collective responsibility for performance of the sector as a whole whilst being primarily accountable to local communities. That said it is important to recognise that councils have a dual accountability – not only to local people, but also to central government.”

South East council

“Principle (b), in stating that councils are primarily accountable to local communities, goes to the heart of the constitutional confusion caused by the fact that councils are democratically elected to serve the wishes and interests of local people but dependent on central government for funding, and it might be helpful to acknowledge this more.”

South East council

- In their response Solace highlighted this issue, stating that “we believe these principles could and should be strengthened by a clearer account of the legitimate, though rightly limited, role the sector believes that government should have in accountability and improvement terms. This should set out a clear principled stance on when government inspection and/or intervention are warranted and, conversely, when they are not. By staying silent on this element the sector abdicates its leadership role, and enables individual governments and individual government departments to take inconsistent approaches.”

- Some respondents mentioned developing a principle around **financial resilience** in acknowledgement of the financial reductions and concerns that local authorities are experiencing and the activities undertaken to address these pressures. For example:

“...the financial challenge facing local government needs to be more strongly acknowledged along with managing changing expectations, new legislative requirements and potential reductions in some service standards, for example, and recognising that this is not a failure per se, just a changing set of circumstances.”

London borough

- Some respondents mentioned including a need for the principles to address **responding to poor performance** and early identification of and support for local authorities reaching a tipping-point/in danger of failing. Several respondents also focussed on the notion of ‘collective responsibility’ with regard to performance. For example:

“There...needs to be a better way to identify those councils who are at the 'tipping' point.”

East of England council

“...I think we need to define what the collective responsibility entails in practice; it's not just about sharing good practice it is about criticising unacceptable performance/behaviour.”

East of England council

“In (c) I worry about the word "collective responsibility for performance". I think there are examples of individual rogue councils where this is unfair. I accept we have a collective responsibility to support improvement.”

North West council

- In its response, London Councils also highlighted this aspect as being of key importance:

“...the LGA's role in providing an overview of the performance of the sector and to identify potential performance challenges and opportunities is a critically important one. If the sector wishes to be credible in arguing against disproportionate levels of external inspection or a burdensome central performance regime, it does need to ensure that this aspect of the key principles is accorded due weight. The obligation of all parts of the sector to take this aspect seriously and to participate actively in the self-improvement process may need stronger reinforcement in the key principles.”

- Some respondents mentioned the need for **sector-led improvement to be flexible and continue to evolve** whilst acknowledging that there may be some limitations with the approach. For example:

“The principles are generally sound. However, our comments in the remainder of the consultation form are based on a more general point that sector-led improvement is very difficult to achieve in reality... as the financial challenge for the sector continues to worsen we can anticipate that there will be no ‘one-size fits all model’, or even ‘one-size fits many’ solution(s) for the sector. There needs to be a balance struck to understand what can be realistically achieved through sector-led improvement.”

London borough

“It is not so much that I suggest some changes, as I think that sector-led improvement needs to continue to evolve. With sector-led improvement, I do not think there is a fixed model that works and we can always depend upon - different priorities, changing circumstances and pressures mean that it needs to be flexible.”

West Midlands council

- On a related note some specific areas for development suggested by individual respondents were:

“An increased focus for demand management/reduction and innovation backed by awareness which will create networks of like-minded councils to move forward different models of delivery.”

East Midlands council

“Greater focus on peer support/reviews in specific areas such as financial sustainability, commercialisation and asset management optimisation, collaborative models delivering outcomes (not just shared service but shared management, combined authorities etc).”

East of England council

“I think (c) regarding the collective responsibility and sharing of best practice needs to be strengthened. Whilst it is right for councils to innovate based on their own circumstances, the time is long past simply sharing best practice. We should be thinking more collaboratively before and during innovation - simple examples are why do we all sign up separately to Mail Chimp or the systems that monitor Facebook and Twitter feeds? Why do we regularly make bids as single councils?”

South East council

- A small number of respondents mentioned the principle concerning **the role of the LGA**, and highlighted the tensions inherent in being a membership organisation that also has a role in challenging performance. These respondents suggested that it will be important to consider how the LGA would need to adapt in order to fulfil this role effectively, as well as clearly defining where along the spectrum from ‘supporting improvement’ through to ‘inspection’ the approach to sector-led improvement will sit. For example:

“There is a question whether the LGA can be objective in its role as champion for local government as well as being objective in identifying and challenging poor performers.”

London borough

“In relation to the principle of the LGA role as maintaining an overview of the sector - if this extends to more than what it currently does there is a real risk that this is perceived as the LGA reinventing itself as a 'pseudo' inspectorate.”

North East council

The Committee on Standards in Public Life recommended that the principles should take account of the behaviour of key individuals and the culture of the organisation, including having in place a good quality whistleblowing policy.

Finally in this section, CFOA suggested that the sector-led improvement principles refer to 'local authorities' rather than councils.

Place based approach

Respondents were asked how the increasing role that local authorities play in working with other parts of the public sector on a place-based approach should be reflected in sector-led improvement. This issue was already highlighted by several respondents to the previous question, who suggested that this should be embedded in sector-led improvement principles.

- A very common suggestion was that **peer challenges should be run with the involvement of partner agencies**. Suggestions included having peers from other organisations on challenge teams, adding an element looking at collaborative working, partnership structures and governance to the challenge itself and running thematic or place based reviews that look at all relevant partners (including neighbouring local authorities and those with whom services are shared). For example:

“Involving other sector experts in the peer reviews and extending the reviews themselves to engage more fully with other agencies.”

Yorkshire and the Humber council

“Consideration should be given to making more formal the inclusion of other statutory agencies that already form a part of peer reviews, and seeking a reciprocal arrangement with, for example, health and police regulators.”

South West council

“[We] believe that both sector-led improvement and more formal, centrally driven inspection or accountability models, must refocus away from institutions and toward 'client groups' and 'risks' or 'outcomes'.”

Society of Local Authority Chief Executives

- Some respondents gave examples of where a place based approach to peer challenge was already starting to emerge, for example:

“The combined district and county peer challenge [in our area]... demonstrated how such reviews can focus on place based issues and challenge individual authorities' performance - could have been more valuable if scope had been beyond the work of the councils and private sector to embrace all players.

There should be more of a duty to co-operate on other elements of the public sector.”

South East council

“We would suggest it already is to an extent, for example through peer reviews of health and wellbeing arrangements, safeguarding etc.”

North East council

- Beyond peer challenge, many respondents suggested the need to **embed and improve partnership working more broadly within sector-led improvement principles**, reflecting the sector’s unique place shaping role. Suggestions included widening the groups traditionally referred to as partners, (to include the community, other authorities and a wider view of the voluntary sector) and seeking ways to ensure better engagement with these partners. For example:

“A model of a pan-public sector-led approach to improvement involving all local public services is worthy of exploration. There are gains to be made both in terms of better collaboration (e.g. shared services, shared budgets) and improving outcomes (e.g. tackling domestic violence, child sexual exploitation).”

Yorkshire and Humber council

“...but it must include changes in the types of partners we make. For example we have a traditional view of the voluntary sector, but this has precluded us from engaging better with very local communities, down to towns and parish councils, in a true partnership capacity. They offer a very real solution.”

West Midlands council

“We need to learn to speak the same language especially with our new NHS partners. Only then will we be able to enable the two differing cultures to create the essential step changes required.”

East Midlands council

“Children’s services work with other parts of the public sector, police, health, probation, etc in a place-based (local area) approach to safeguarding and protecting children. Sector-led improvement in children’s services should therefore reflect this approach, drawing in and on current or very recent practice leaders’ experience.”

Association of Directors of Children’s Services

- Respondents made a range of further suggestions on the **considerations required when reflecting a place based approach in sector-led improvement**, as well as some practical suggestions, for example:

“There needs to be more engagement with other sectors to better understand priorities and tensions. There is a need to avoid potential duplications and contradictions with improvement activity in other sectors.”

London borough

“If it is to help, the sector-led improvement programme needs to focus on the contribution of the individual council to wider place-based approaches, whether

these are within or cross boundary. We all know the difficulties associated with joint working, but our focus needs to be on what we can influence and control.”

South East council

“Models are different in different places, so sector-led improvement also needs to be responsive to the local context.”

South West council

“In some areas local partnership areas are consciously local authority led – particularly where councils seek to deliver services through commissioning, or through alternative delivery vehicles. In others, a variety of different bodies and agencies co-operate on areas of mutual interest, making accountability more diffuse. The way that sector self-improvement engages with partners will consequently need to be flexible to take account of this.”

Centre for Public Scrutiny

- Some respondents made suggestions around **the role the LGA could play** in supporting a move to a more place based approach. These included:

“Greater involvement of the LGA in providing advice [regarding] combined authorities.”

West Midlands council

“I think that it would be helpful if the LGA held a composite set of indicators for the quality of life in an authority area and published data on performance of other parts of the public sector in that place.”

Yorkshire and Humber council

“The sector-led improvement approach remains too silo based and inconsistent across service areas which means it’s difficult to draw any wider conclusions about the performance against ‘place’ outcomes. The LGA could support better sharing of information and intelligence across sectors, for example regional health observatories.”

East Midlands council

Local accountability

Respondents were asked whether there was more that all councils should do to strengthen local accountability in their areas, and if so what should be done. Whilst some respondents felt that local authorities were already accountable and actively strengthen accountability through existing mechanisms and the publication of data, many felt that more could be done. There were a number of key themes that emerged, many of which were overlapping:

- The importance of **communication** with residents, partners and stakeholders; the quality and accessibility of that communication and the role that **social media** and other related mechanisms such as webcasting of meetings can play, for example:

“It is critically important that councils connect themselves with their communities on shaping future services through effective engagement, be that on individual issues or the overall aims of the council. Also need to ensure that public access to information regarding decisions made within and outside of meetings is easy and fast. Clear communication strategy on key items and

major programmes (especially major service change programmes) [is] imperative to ensure the public have the opportunity to shape decisions.”

Yorkshire and Humber council

“Unfortunately most residents are not interested in reading detailed performance reports/statistics and judge their local council on their experience of services, if they have low expectations or, as with child sexual exploitation, [if they] are not aware of the problem they don't readily push for accountability. We could all look more closely at the ways we communicate this information and be more ready to acknowledge where there is a need to do better.”

North West council

“With the massively reduced resources available to local government it is difficult to maintain the existing level of accountability. Greater use of social media and information available via good websites could improve openness and therefore accountability.”

North West council

- **Transparency** as part of the **open data** agenda, as well as a basic principle, and the role that it can play in accountability was another key theme. For example one authority outlined a number of steps that it takes to use open data to improve accountability, and stressed that the focus should be on strengthening accountability to the public rather than inwards within the sector or upwards to government. Steps that this authority had taken included producing a quarterly performance report which is published on the website and presented to cabinet and scrutiny committees, publishing reports by the internal audit function, and holding their audit committee meeting in public unless there is an explicit reason not to. Their published information is also available for re-use under the terms of the Government Open Licence for Public Sector Information. On the same theme, two authorities commented:

“We should promote the transparency of political decision making in areas, promoting openness around the communication of public meetings for example. Also, embrace the open data approach but with commitment to accessibility of that data for the general public.”

East of England council

“There needs to be regular and current publication of all key performance data as soon as possible after councillors have received such data and had the chance to debate any issues arising. The information should be made available in a form that is readily understandable by the general public and reflect local issues and concerns as appropriate.”

East of England council

- Another key theme was that of **public and community engagement**, with communication, accessibility of information and transparency considered to be the mechanisms by which engagement can be achieved. A small number of respondents also highlighted the importance of making engagement robust, using locally appropriate mechanisms such as area forums, co-design of services or meaningful consultation on key policies. One respondent gave a range of suggestions as to potential mechanisms:

“Involvement of local residents and businesses in identifying local priorities and shaping local service delivery, [which can be] primarily achieved through multi agency/community representative strategic and local area partnerships... Mechanisms for all tiers of local authority to work together to be responsive to the needs of local communities... Ensure publication of the methods the public can use to engage in the democratic processes within the council. Provide clear information on the services provided by each tier of government and other public sector organisations.”

South West council

- A small number of respondents mentioned that it **can be difficult to engage residents** when there is not a specific ‘live issue’ that they are interested in, for example:

“Accountability will always be reliant on public engagement. Currently most people engage when they have something they wish to complain about, and the rest of the time seem happy to leave it to the members they elect. Social networks will help, and we all need to seek other opportunities.”

South East council

- Some respondents voiced their concern over the possibility of an imposed or top-down model for accountability, noting that local authorities required unique, **individual approaches to accountability**. However, support from national bodies such as the LGA were considered a valuable resource:

“Although this is a matter for individual councils to consider, there are a number of possible approaches that have been discussed nationally that could strengthen local accountability whilst helping to drive whole-place approaches across public service partners – including the concept of Local Public Accounts Committees. However, we should avoid enforcing a national, top-down, one-size fits all approach to this. And, councils (and other partners) generally have very limited resources and capacity to develop additional elements of local accountability.”

North East council

“Largely this is a matter of enhancing accountability within a local context (so there is no ‘one size fits all’ solution). However, the work the LGA and District Councils Network are doing to share ideas and learning across councils helps greatly with innovation, risk management and efficiency.”

South West council

“It should be for each individual council to determine how it wishes to interact with the local community. National government should not restrict publications and other communication channels that local councils wish to use.”

North East council

- Finally on this point, there were other issues mentioned, but less commonly; one was the role of elections and elected members. Whilst a few considered the electoral process itself to underpin accountability others saw that it was through the more active role of democratically elected members that accountability can be strengthened. Another suggestion for improving accountability was the publication of annual performance reports and reviews (including reviews undertaken as part of sector-led improvement) and performance data; these comments were framed by the need for improved communication and accessibility of data. Scrutiny and the consistency and comparability

of data were also raised by some respondents, and these issues are discussed in more detail in the sections below.

Performance data

Respondents were asked whether councils or the LGA need to do any more to ensure that local people and others have the comparative performance data they need to hold councils to account, and if so what should be done. Some respondents felt that there was no need to do more, because local authorities already make a wide range of data available and LG Inform already fulfils this function. For example:

“We feel local government is already the most transparent area of the public sector. . . We do support the introduction of the LG Inform tool that has the potential to be a tool as valuable as the Home Office iQuanta system. We would hope that as more local authorities begin to see the value they participate and further utilise this tool.”

North East council

Others felt that no more needs to be done on this because different local authority models, priorities and circumstances as well as data issues mean there is limited value in comparing data. The majority of respondents, however, thought this was an area that would warrant improvement. Key themes were accessibility of data, comparability of data and the role of LG Inform.

- **Accessibility** of data was highlighted by many respondents as an area that requires improvement. Accessibility covered both the way in which the data was presented and broken down as well as how easy it was to find on an authority’s website. Several respondents also commented that data needs to be accompanied by context and explanation to ensure it is interpreted correctly and is meaningful to residents:

“Authorities already publish key performance and financial data but some council websites bury the information away. All authorities should be encouraged to make it easy for residents and others to access this information.”

South East council

“Clarity, format and good signposting are essential to understanding data. It should also be accompanied by a clear narrative where necessary to explain what the data is seeking to portray. There is guidance available as to how to provide this form of data and good practice should be learnt from others.”

Chartered Institute of Public Finance and Accountancy

- On the issue of accessibility, a small number of respondents also suggested that the sector could do more to facilitate the use of open data, for example through encouraging and enabling the development of apps by the private sector. Solace cites Transport for London as an example of an organisation doing this effectively. Fundamental to enabling development of this is the reliability and comparability of data, which is discussed in the bullet below.
- **Comparability** of data was a key issue raised by respondents. These respondents stated that the issue of whether data was comparable was due to inconsistencies in some data collections and differences between local authorities. The ability to compare ‘like with like’ was seen as essential. The challenges involved with making effective comparisons was

also cited by some respondents as a reason not to encourage comparison between authorities:

“Clarity about the data and making it truly and easily comparable would be helpful. All too often it is not comparable.”

East of England council

- The issue of comparability is also linked to **consistency** in the presentation and availability of data. In their response, Solace stated that LG Inform is a first step towards this, but suggested that the LGA should play a critical role in brokering agreement across the sector on data standards and formats, and this was also echoed in other responses. Some other comments included:

“Agree a consistent data set across which outcomes for all services areas can be evaluated and benchmarked through LG Inform.”

East Midlands council

“I don't know what the solution is. Despite the LGA's efforts, benchmarking has definitely gone backwards since deregulation, and without strict definitions, what there is becomes questionable. There may still be the need for some prescribed performance indicators but perhaps these should be formulated and agreed by the sector, rather than imposed from above.”

West Midlands council

- A small number of respondents suggested agreeing a small set of key performance indicators for the sector, for example:

“The value of any comparative data is dependent upon the accuracy of that data. A small number of key performance data with properly defined criteria for their completion and a commitment from councils to collect and publish this data promptly would assist in this objective.”

North West council

- Finally, some respondents questioned the role of **benchmarking performance data as a way of enabling local accountability** more generally, with some questioning whether there is really demand from residents for this type of information. It is worth noting that many of these respondents felt that benchmarking is useful for improvement, individual services, councillors and government, just that it may not be the most effective tool for local accountability:

“The public are not generally interested in performance indicators, just their experience of services. However comparative data can be useful. LGA can build on existing mechanisms eg LG Inform to allow comparisons where useful and required. We must not create an industry out of this stuff but be able to respond to community concerns. Context is as important as comparison.”

South East council

“This is difficult as much of the data that is easy to compare is not the data you need; [you need really to] compare outcomes rather than outputs. I don't think comparison is a big thing for residents, they want to know what it feels like for them. Maybe consider the value re introducing consistent residents survey.”

East of England council

Scrutiny

Respondents were asked whether there is anything more that needs to be done to help councillors exercise effective scrutiny. There were two main themes: training and best practice examples.

- **Training** was identified by around a third of the respondents who provided an answer for this question. This included an improvement to the training available, **guidance materials**, as well as more specific areas, for example training in **how to challenge**. Some noted that there was a certain level of apathy towards engaging in training:

“We need to work with scrutiny systems to ensure that they have a toolkit available that helps them to do their job well. This includes good practice in reviewing performance; good practice/toolkit in reviewing the evidence used to arrive at decisions; and advice on how to engage with the public, other public sector agencies, and the wider council on selecting the right topics for the year ahead.”

South East council

“This is a deep question that goes even to the selection of candidates for election by the political parties. But there may be more we can do by way of training councillors in the type of questions they need to be asking.”

East of England council

- **Best practice** examples and the dissemination of this was the second theme most commonly cited by respondents:

“The continued promotion of best practice and exemplars across the country is always useful perhaps with some mentoring offers for those individuals that generally want to improve?”

Yorkshire and Humber council

“There is still a long way to go to see truly effective scrutiny and overview... A clear identification of successful scrutiny and overview would be helpful as we enter new councils in May.”

East Midlands council

- Within the range of answers there was reference to several other issues. Some respondents mentioned issues associated with a **large political majority** and the impact of different democratic structures, for example:

“Taking on board the lessons of Mid-Staffordshire and Rotherham, it is important that councils are confident that they have adequate arrangements in place for effective scrutiny to be exercised. It is suggested that councils might be encouraged to examine closely their governance arrangements to ensure that they are sufficiently robust and appropriately balanced. This may be a particular priority in areas where, as in Rotherham, one political party may have had a large and long-standing majority.”

North West council

- Another issue mentioned was around the need for **culture change**, for local authorities to value scrutiny and demonstrate that real change can take place as a result. **Community**

engagement was also identified by some respondents as critical to effective scrutiny within local authorities, and these two issues are demonstrated in the quotes below:

“The scrutiny function should showcase local authorities' ability to drive performance improvement, champion public engagement with democratic decision-making and demonstrate effective holding to account of decision-makers and input into policy development. There is insufficient evidence of this happening, and this makes it hard to demonstrate how councils are demonstrating their primary accountability to communities. The importance of this function is not fully reflected in current sector-led improvement arrangements.”

South West council

“... in my experience there is still a tendency to default to combative select committee / partisan behaviours which can lead to defensive and protective behaviours. Conversely if a serious issue/concern is identified I have rarely seen a scrutiny chair write formally to a lead member/chief executive. There should be more encouragement for informal - as well as the public and formal - discussion and co-operation between scrutiny chairs, senior executives and lead members... An opportunity for the public to identify issues which they believe scrutiny should look at and the ability of scrutiny chairs to flag issues through to the LGA and/or external auditors if they continue to have serious concerns about an issue would be good.”

Yorkshire and Humber council

“... Councils where scrutiny is not taken seriously, and where scrutiny benefits from little organisational and financial support, need to undergo a cultural change to recognise the fundamental role that scrutiny plays within the corporate governance framework. This will be no mean task. It will require significant changes in attitudes which can only be brought about by leaders, cabinets and senior officers themselves, as an understanding develops within the upper echelons of local authorities of what scrutiny can bring to local decision-making. ... Councillors need to be given the skills, and options, to decide consciously to undertake scrutiny better and more effectively in the future. Part of this is about being clearer about the existence of a parity of esteem between scrutiny and decision-making. Part of it, however, is about councillors themselves making the commitment to use their time effectively, to take responsibility for leading and improving the scrutiny function.”

Centre for Public Scrutiny

Finally, other responses to this question covered the importance of benchmarking and performance data for providing scrutiny functions with the evidence needed to inform judgements, and a need for consideration of the role of scrutiny as local authorities move more towards partnership working.

Improvement, assurance and intervention

Peer challenge

Respondents were asked whether they had any views on the core components of peer challenge. Responses were generally supportive of the format of peer challenge, including the core components, but a number of suggestions were made in terms of what works well or how they could be improved. Four broad themes emerged from the analysis and these are

explored below.

- Much of the response data concerned the **balance between consistency and flexibility**. While there was recognition that the core elements of peer challenge enabled a level of consistency across the sector and many commenters felt standardisation was important, a view that was common among respondents was that the flexibility to also shape the challenge around local need enabled them to maximise their value. In some cases there were suggestions that peer challenges could be more flexible than they currently are. Examples of comments made around consistency versus flexibility are outlined below:

“The core components provide a degree of consistency whilst the process allows councils to define areas that they themselves are particularly interested in or concerned about, which provides flexibility.”

West Midlands council

“The components are fine as they are, but we think that there needs to be greater flexibility in the way they are applied. As each local authority is different we would argue that the focus placed on each component is agreed in consultation with officers before the review commences, and that this can be flex[ed] as the inspection progresses.”

London borough

- However, in their response, Solace signalled that peer challenge should be less driven by local choice:

“In terms of the role of peer challenges in providing assurance, it is our view that the lines of enquiry and areas of focus of reviews are driven too heavily by ‘local choice’. While there is a role for local choice, there is also a role for the sector collectively identifying priority areas for focus and pursuing these.”

Society of Local Authority Chief Executives

- Echoing comments that respondents gave on the principles of sector-led improvement, a very common view from respondents was around the need for peer challenges to reflect an increased focus **on local partnerships and community leadership**, and the need to apply the core components to areas as opposed to just local authorities. For example:

“The current core components of corporate peer challenge are generally suitable, however these could be further expanded. For example, the co-ordination role played by councils to involve key partners and other stakeholders could be made more explicit to take on board the role of wider partnership working. There is a disconnect in the current set of components relating to what peer challenge means for communities.”

North West council

“From our perspective, the extent to which a local authority can demonstrate the strength of relationships with partners and peers and how these are cultivated and developed to support improvement at all levels of the organisation is key...”

Improvement and Efficiency West Midlands

- The current core focus on priority setting, leadership, capacity, corporate governance and financial resilience was very popular among respondents, but a number of respondents felt various other aspects are important or should be included. One of the most common areas of interest was around **engagement with and accountability to local people**.

“We would also suggest that performance management, working in partnership with other organisations, and community engagement also form a key part of that core work assessment given the importance of gaining insight from communities and working with others to best design and deliver outcomes.”

Yorkshire and Humber council

- Another common theme emerging was around the inclusion of **performance management** within the core components, with some respondents also highlighting related issues around priority setting and a focus on outcomes. For example:

“The core components are basically sound but I would include more explicitly civic leadership - place making - performance and risk management. It is implicit and is covered - but specific challenges and risks could be explored more fully.”

Yorkshire and Humber council

“A core component of a peer challenge should be to confirm that the use of resources is aligned with the agreed priorities of the council, that strategies are based on firm intelligence and are evidence based, performance against plans is monitored and managed and that all of this delivers improved outcomes for the community.”

East Midlands council

Other suggestions for improvement of the core components included increased focus on scrutiny, data and transparency, innovation, corporate culture and risk management.

Respondents were asked whether, in their view, all authorities should be expected to have a corporate peer challenge on a regular basis, for example every four years. As Table 5 shows, the majority of respondents stated that this should be the case, with 72 per cent of chief executives and leaders saying that they agreed, and 73 per cent of all respondents.

Table 5: Should all authorities be expected to have a corporate peer challenge on a regular basis, say every four years?

	a) Chief executives and leaders	b) Full sample
	Per cent	Per cent
Yes	72	73
No	24	22
Don't know	4	4
Total	100	100

Base: a) all chief executives and leaders (154 respondents) b) all consultation responses (187 responses)

Whilst this was a closed question, a small number of respondents made use of the opportunity to give further comments at the end of the consultation to provide more information on their views around this issue. One point made was around the important distinction between expectation and compulsion. For example, East Midlands Councils stated:

“while there is support for a firm expectation that councils (and particularly those in membership of the LGA) should accept a peer challenge, members were not in favour of ‘compulsion’ with the view that peer challenge is likely to be more valued if welcomed as an integral part of a council’s process of self-improvement rather than being seen as an obligation that it needs to satisfy.”

However a small number of respondents did support compulsion, seeing it as a means of providing genuine assurance to local communities. Solace suggested:

“Compulsion could be underpinned by making participation a compulsory part of LGA membership, and if this were possible Solace would be in favour. If this proved difficult to implement, another approach would be to underpin compulsion with a backstop of government inspection.”

CfPS made a similar suggestion around incentivising local authorities to participate in sector-led improvement:

“It seems reasonable to expect that councils choosing not to participate in the LGA’s sector self-improvement offer might be subject to additional scrutiny from central government, for example, or that they would not be able to enter into combined authority or other arrangements which require deals with central government, as they would not be able to demonstrate independently the effectiveness and quality of their services.”

Some respondents highlighted that a strong expectation of participation has some real benefits in terms of demonstrating credibility and a commitment to improvement. For example London Councils stated:

“It is...valuable for the sector to demonstrate a consistent approach to self-improvement which shows that, in the vast bulk of cases, councils are inviting a level of challenge – from peers – which shows they are open to identifying performance challenges and acting upon them. Without that, it is harder for the sector to argue against the imposition of a more intensive external regime which, in turn, may be less useful to a council’s own journey of improvement than would be the case were it to engage with peers from across the sector.”

Others noted however that peer challenge is not the only mechanism for demonstrating a commitment to sector-led improvement, and may not be the appropriate approach in all cases. For example:

“[We believe] that effective improvement could be achieved from the ‘bottom up’ through more focussed service reviews and other mechanisms which are embedded in organisations with an effective learning culture... The LGA could play a role in supporting this approach and should seek to share best practice. They should also be able to facilitate full corporate peer challenge if requested.”

North West council

“Councils should not be expected to have a regular peer challenge. This is a return to a one size fits all, inflexible form of sector regulation. Local councils should make the decision as to when and how they look to review performance. They will need to decide if the most appropriate peer challenge is a corporate one or if it is for particular service... That said, we do think the LGA could, through its influence and political and officer peer networks, be more

pro-active in encouraging those councils where there may be challenges to adopt peer reviews.”

East of England council

Respondents who had concerns about an expectation of participation in corporate peer challenge cited that this could undermine the flexibility and tailoring that is a current strength, as well as threatening the positivity, ‘buy in’ and openness which is achieved from seeking reviews rather than having them imposed, and on seeking to improve rather than looking to achieve a score. These strengths were also recognised by those who did support the expectation of participation, with some specifically highlighting the importance of maintaining flexibility in terms of focus and timing.

A couple of respondents mentioned the importance of maintaining a distinction between sector-led improvement and inspection. For example, the Association of North East Councils stated that “there are often confused expectations around the role of inspection and peer challenge. The relationship between improvement, reporting and regulation is complex and uncoordinated – roles and responsibilities need to be clarified.”

Linked to this, the National Audit Office stated:

“We reported in our 2014 report, *Local government funding: assurance to Parliament*, that the Department for Communities and Local Government relies on the LGA’s sector-led improvement work as part of its accountability system statement. It also states that information from the LGA on its sector-led work is a key source of information in overseeing the effectiveness of the accountability system. Our view is that accountability systems need to be mandatory to be effective. The LGA may wish to consider the government’s reliance on its sector-led work for securing assurance to Parliament when setting expectations for how regularly local authorities should be subject to corporate peer challenge.”

The consultation then asked whether all corporate peer challenge reports should be published. As Table 6 shows, views on this were more mixed, with 47 per cent of chief executives and leaders and 49 per cent of the full sample saying that all should be published, whilst in both groups 32 per cent agreed that this should be the case, unless there are exceptional circumstances. The least frequently selected option was that this should be a matter of local choice (21 per cent of chief executives and leaders and 19 per cent of the full sample selected this option).

Table 6: Should all corporate peer challenge reports be published?		
	a) Chief executives and leaders	b) Full sample
	Per cent	Per cent
Yes - all should be published	47	49
Yes - unless there are exceptional circumstances	32	32
No - this should be a matter of local choice	21	19
Don't know	0	1
Total	100	100

Base: a) all chief executives and leaders (154 respondents) b) all consultation responses (187 responses)

Several respondents provided further comments on this question, with some emphasising the importance of publishing in terms of transparency, credibility and accountability. A couple said that they found it hard to envisage what exceptional circumstances might make it

appropriate to keep a report confidential once the wording has been agreed, for example Solace stated:

“We cannot conceive of an extenuating circumstance that would justify the non-publication of a peer review, though we do recognise that there is often some sensitivity around the timing of publication. While such reviews do not have the same legal status as external audits, we believe publication should be considered a non-negotiable part of the peer review process.”

Some respondents were concerned that requiring publication would have a negative impact on the trust and confidence to have frank discussions that underpin the peer challenge approach. For example:

“Of course all councils should be encouraged to consider publishing their peer challenges. But there might be aspects of the peer challenge report that it would be inappropriate to publish and this should be taken into consideration. We would also highlight that a key strength of peer challenge is that it creates honest conversations that drive real improvement and change in an organisation. We should therefore consider the impacts that publishing all peer challenge reports would have on the effectiveness of peer challenge.”

North East council

An example of a stronger view against publication is outlined below:

“The current encouragement by the LGA on councils to publicise their peer challenge reports is counterproductive. Reports need to be clear and direct on problems and issues the council in question faces. These are often very sensitive and so putting them in the public domain can only result in a watering down of the product. An opportunity wasted.”

South West council

Some organisational responses highlighted that, whilst they supported an expectation of publication, this should not be compulsory. Further, CFOA pointed out that “all fire and rescue authorities which have undertaken a fire peer challenge have in fact published their reports. This suggests that compulsion is not necessary.”

ADPH suggested that guidance on producing reports should include giving due consideration to providing a balanced view of the local situation, and to ensuring that the language is accessible.

Similarly, the Committee on Standards in Public Life suggested an element of standardisation in the format of peer challenge reports, to enable comparability, and also that they should be published on the LGA website. They also suggested that the LGA could, in its role in maintaining an overview of the performance of the sector, publish an annual review of peer challenges, including capturing best practice as well as highlighting any areas of risk or areas for improvement, and how these are being mitigated. This was a view also echoed by other respondents.

Finally, the National Audit Office stated: “Sector-led improvement is included as an important mechanism in DCLG’s accountability system statement. We would expect transparency to be a key criterion for effective accountability. The LGA may wish to consider these issues when thinking about whether corporate peer challenge reports should be published.”

Table 7 shows the views of respondents on whether authorities should be expected to produce an action plan following a peer challenge. The majority of respondents agreed that authorities should be expected to do this (82 per cent of chief executives and leaders said this, and 84 per cent of the full sample).

Table 7: Should all authorities be expected to produce an action plan following a peer challenge?

	a) Chief executives and leaders	b) Full sample
	Per cent	Per cent
Yes	82	84
No	14	13
Don't know	3	3
Total	100	100

Base: a) all chief executives and leaders (154 respondents) b) all consultation responses (187 responses)

A small number of respondents provided extra detail on this question and amongst these a frequent comment was that, whilst in the interests of transparency and accountability some form of plan should be put in place in response to a peer review, there should not be a prescriptive requirement around the layout and nature of the plan. Some suggested that this could be incorporated into existing corporate improvement plans to ensure that it is not a one off exercise that is not monitored or followed up; however others said that whether this approach is appropriate will be down to the discretion of individual authorities. Improvement and Efficiency West Midlands suggested that mechanisms could be put in place to help encourage ongoing improvement activity to take place, for example ‘pairing’ authorities on post peer challenge issues, perhaps using a ‘best in class’ approach.

One respondent who felt that there should be an expectation to produce an action plan stated:

“...this is a fundamental part of any such review and we need to demonstrate the benefits from the sector-led improvement approach directly and how this is value for money from public funds. This is also an important factor in convincing central government of the seriousness given by local authorities to their performance, learning and the sector-led improvement approach itself.”

Yorkshire and the Humber council

Similar to the two questions above, a couple of respondents who answered ‘yes’ highlighted the important distinction that they were supporting all authorities being expected to produce an action plan rather than being compelled to do so.

As Table 7 shows, a small number of respondents did not support the suggestion that all authorities be expected to produce an action plan following a peer challenge. For example CfPS stated that “councils should not be required to produce an action plan. With the report in the public domain it should be for the council itself to be held to account by its own members on its response.”

Government inspection

Respondents were asked whether there is anything else that should be done to limit government’s appetite for inspection. A large number of the responses reiterated their support for sector-led improvement and peer challenge, and other common responses are outlined below.

By far the most common general response was that it was important to **demonstrate the benefits of sector-led improvement compared to central inspection**. This could be done by providing evidence that sector-led improvement is working and that local government has in place a regime that can ensure continued improvement. Through this evidence base, local government would be able to provide assurance to central government. For example:

“Cite prominent examples of success from sector-led improvement...”

West Midlands council

“As the LGA notes, the sector continues to perform effectively despite the challenges we face. We think that we need to continue to use data which is already collected to press this case to government and other stakeholders.”

London borough

A number of responses focussed on the **cost of the previous centrally-led inspection regime**, compared to the current sector-led system, making the case that the former was more expensive. For example, one respondent said the LGA should produce a:

“...clear and costed business case to estimate how more robust sector-led improvement will be more efficient and effective than reintroducing Audit Commission-type arrangements.”

North West council

“Effectively demonstrate the true value and difference inspection makes balanced against the costs to inspectorates and public sector organisations. There are several examples of where inspections/assessments have taken place with questionable effect.”

North East council

There were, however, a number of responses that did suggest **there was a place for inspections**. None of these responses suggested that sector-led improvement should be replaced by a central government led system, but that there were circumstances where an inspection would be appropriate. This was normally where it was clear that sector-led improvement had not achieved the desired result, perhaps where an authority had failed to engage with the voluntary arrangements.

“Whilst councils should be expected to have regular peer reviews, we need to have provision for exceptional circumstances. Where [government] wishes to intervene, the conditions should be failure to meet defined standards in the core components; it should be objective.”

South East council

Some respondents pointed out that it was important to make it clear exactly when inspection would be appropriate. For example:

“We should not so much limit government's appetite for inspection as clarify the circumstances when it is entirely appropriate, e.g. an authority that refuses to have a peer challenge, or when there is prima facie evidence of corporate or financial failure.”

South East council

Another theme emerging from the responses was that government's appetite for inspection would be limited if the sector-led improvement arrangements, such as peer challenge, **should become mandatory or expected** to some degree. This issue has been covered in detail in the section on peer challenge above.

More common than suggestions that sector-led improvement arrangements should become mandatory, was the idea that **sector-led improvement should be more robust** in various ways. A number of commenters felt that the LGA and the sector should be more proactive in identifying and intervening where problems are emerging, and demonstrating a clear and planned approach to how underperformance will be identified and addressed. For example:

"[The] LGA needs to be bolder in calling out problem areas and pro-actively intervening to provide support. However if a whole council is in denial...it is hard to see how collegiate LGA approach will ever be sufficient unless we agree to give ourselves more teeth."

South East council

"Be clearer about how we would effectively deal with failure in our sector."

South East council

Related to the point above, a small number of respondents highlighted the importance of making sure the approach is adequately resourced.

Others focussed more on peer challenge itself, suggesting ways in which the process can be made more robust. For example:

"A short, sharp mid-term review should be in place to follow up on the implementation of the action plan 18-24 months after the peer challenge."

South East fire and rescue

One theme that emerged, which was less common but still substantial, was that government's appetite for inspection could be limited if the local government sector were to become more transparent. This included publishing peer challenge reports and performance data as well as transparency more generally. For example:

"Openness and transparency is the key along with action planning [which] would be essential if we were to convince government on self-regulation."

North West council

"Transparency and accountability have become dirty words. They should not be! We need to find the right balance as individual councils and as a sector to challenge the unacceptable and be confident and assertive where there is unnecessary attention. The role of local politicians is essential."

North West council

Improvement support

Respondents were asked what changes they would like to see from the LGA's improvement offer. The most common answer given was that no changes are needed, with one respondent saying, for example, "I think the current offer is flexible and appropriate. I'm

content with it.”⁶ However, respondents did have a range of comments and suggestions, and these were diverse with no particularly strong themes emerging. The most common suggestions covered the following areas:

- Some respondents asked for more **examples of notable practice and innovation**, and **sharing of learning**, for example:

“Additional support for councils to make future savings and deal with ongoing financial challenges, including examples of best practice and innovation in other areas.”

North West council

On a related note, Improvement and Efficiency West Midlands favoured more opportunities to come together, network and learn at the national, regional and local level, as well as with other public sector bodies, using creative methods such as webinars.

- A small number of respondents took the opportunity to make further comments about **peer challenge**. These covered the importance of ensuring a consistently high quality of peer challenge team members (including sufficient training), the need to widen the available pool of peers, and the need to improve follow up after peer challenges. East Midlands Councils, for example, suggested that the approach to follow up should be made an integral and firmer part of the approach to sector-led improvement. Other examples include:

“...the LGA must ensure that the quality of peer review teams is consistently high. If the process is going to become more robust and have more "teeth" then councils on the receiving end will be more challenging over feedback and written reports. That means that the teams putting these together, particularly where it involves criticism, must be able to evidence findings.”

South East council

"There should be standing pools of experts and more comprehensive toolkits developed that can be used and deployed according to the areas highlighted through the peer challenge process, or where internal processes have identified areas for self-improvement. This will supplement and improve the LGA's offer by directing organisations to sources of support.”

North West fire and rescue

In addition, Solace suggested that more could be done to draw out the collective lessons and areas of risk arising from peer challenges, and then use these to inform the areas of focus for peer challenge, alongside the standard core components and areas that those councils themselves wish to focus on.

Many comments reflected themes already covered in the sections above. For example, a small number of respondents talked about being more robust in terms of the expectations around participation, whilst others echoed previous comments about the importance of evolving the approach to more strongly reflect the realities of place based working, and drawing in expertise from other sectors. Other suggestions, each made by small numbers of respondents, included:

⁶ East Midlands council

- have a sharper and firmer sector-led improvement offer targeted at the most challenged end of the performance spectrum
- have a clearer strategy for releasing expertise across the sector to fulfil the potential of sector-led improvement
- continue to strengthen and develop the existing offer, and make sure it is adequately resourced
- provide tailored and flexible support
- reflect the challenges faced by different types of local authority and different service models in the offer
- provide targeted support for struggling local authorities
- improve support for elected members (including those outside of key positions)
- look at the support for improvement at a regional level to make sure the LGA is aware what is happening, that this is aligned with the national offer, and that there is consistency of quality across the regions (and Solace also recommended developing and expanding the regional offer)
- learn from best practice in the regions – for example, Improvement and Efficiency West Midlands gave a number of examples of activities that are working well in the region
- make best use of member networks
- improve the clarity and visibility of the support offer
- recognise that sector-led improvement depends on the capacity of councils to be involved, and this can be challenging
- develop the leadership support offer for senior officers.

Complementing comments made elsewhere by other respondents to the consultation, around making clearer the LGA’s approach to the risk of underperformance, Solace suggested a more formal recognition of the ‘behind the scenes’ work that the LGA does to provide support and challenge, as well as better evidencing the impact of these activities.

Children’s services

The consultation also asked respondents for their views on sector-led improvement in children’s services, adult social care and health, and the remainder of this document focuses on these service areas.

Table 8: Is there a continued need for the inspection of services that protect and care for children and young people?

	a) Chief executives and leaders: single and upper tier	b) Full sample
	Per cent	Per cent
Yes	94	84
No	3	2
Don't know	2	15
Total	100	100

Base: a) all chief executives and leaders from single and upper tier councils (87 respondents) b) all consultation responses (186 responses)

Respondents were asked whether, in their view, there is a continued need for the inspection of services that protect and care for children and young people. Table 8 above shows the

answers given by chief executives and leaders from single and upper tier authorities with responsibility for children’s services, as well as the views of all consultation respondents. Respondents were strongly in agreement that there is a continued need for this, with 94 per cent of chief executives and leaders who responded answering ‘yes’. Eighty four per cent of the whole sample also answered yes; this proportion is lower primarily because of a larger proportion answering ‘don’t know’, as would be expected as the full sample includes district councils and fire and rescue authorities, amongst others. This pattern is apparent for all the questions on children’s services in this section.

Not unlike most other respondents, ADCS was in favour of the continued inspection of services that protect and care for children and young people – adding that this was necessary “...whatever the problems of the current construct and implementation of inspection.” Support for this position was offered by others too, but these responses contained caveats – that inspection was important but could be “very resource-intensive in its current format”⁷ and it needed to be “proportionate and understand its impact on the sector...”⁸.

The West Midlands branch of ADCS, and Improvement and Efficiency West Midlands, agreed that there was a continued need to inspect services that protect and care for children and young people. They added:

“This is a key area of public interest which requires openness and public accountability. The reality is that despite some significant areas of development for sector-led improvement this work is not mature enough and does not yet have strong enough identity with the public to yet be seen as a suitable alternative. So, in the short term we do not envisage this changing.”

Nevertheless, while agreeing with the continued need, these two organisations reflected on the possibility of developing a model which incorporates the strengths that sector-led improvement can offer as part of a more collaborative approach to assurance. In terms of sector-led improvement, they suggested that the approach could include greater use of thematic approaches and an enhanced focus on learning, and that the peer review components could have a stronger focus on investment/prioritisation. They said the assessment processes needed to “...consider both the absolute results achieved (i.e. are children safe) and the relative results secured (i.e. are children as safe as is possible in the financial context).”

Table 9: If you answered yes, should that inspection be carried out by Ofsted?

	a) Chief executives and leaders: single and upper tier	b) Full sample
	Per cent	Per cent
Yes	45	38
No	30	32
Don't know	24	30
Total	100	100

Base: a) all chief executives and leaders from single and upper tier councils who answered yes in Table 8 (82 respondents) b) all consultation responses who answered yes in Table 8 (152 responses)

Those respondents who answered that there is a continued need for the inspection of services that protect and care for children and young people were asked whether they thought that this inspection should be carried out by Ofsted. As Table 9 above shows, views

⁷ Yorkshire and Humber council
⁸ South West council

on this were varied, including a high proportion of respondents answering ‘don’t know’ (24 per cent of chief executives and leaders who responded from single and upper tier authorities). Views amongst those that expressed an opinion were somewhat split, although with a slightly higher proportion answering that this inspection should be carried out by Ofsted (45 per cent of chief executives and leaders) than that it should not (30 per cent of chief executives and leaders).

Some respondents elaborated on their response to the question of whether or not an inspection of services should be carried out by Ofsted. By and large, statements of support for Ofsted were qualified by provisos about possible improvements to the current regime, such as making it more “proportionate” to need.

One county in the south east wrote about the value of having a local perspective when it came to inspection – and said improvements in children’s services would be best led by those working within local government on a daily basis, or at least those who understood how to recognise local factors. This council raised various points of consideration about any future inspections/inspectorate, including for example that it should:

- be transparent and balanced
- have the confidence of the public
- not undermine confidence in local leadership – as this can cause “risk aversion” among leaders and senior officers
- respect existing local relationships e.g. with members, children’s advocates and service users
- take a less adversarial and competitive approach
- be accountable to service users and their families, just as those who are responsible for the services being inspected (as with peer-led teams)
- focus more on outcomes (in caring for children and young people) than processes – including the extent to which services have improved
- be open to challenge on the basis of decisions made – especially if children see their services as being “failed” rather than improved.

Further frustrations with Ofsted’s current regime were echoed by others. Perhaps the most negatively, one chief executive remarked that Ofsted was “not fit for the future” because it “...judges a complex multi-agency system by passing judgement solely on the local authority – and then often imposes a long list of improvement recommendations...which do little more than ascribe short term tactical fixes to what are often systemic, multi-agency problems”⁹.

ADCS said its objections to the single word judgment in the Single Inspection Framework were well-known (including the validity of inspection methodology, the reliability of inspection judgments and the calibration of grade boundaries). That being said, it continued by saying its members “felt strongly” that it is important for a single inspectorate to have a remit for the inspection of education and children’s services because it “reflects the holistic approach that local areas take to improving children’s outcomes”. They said: “Imperfect Ofsted maybe, but there is no evidence to suggest that another existing inspectorate, or indeed an inspectorate that might be newly created, would be any better.”

⁹ West Midlands council

The West Midland branch of ADCS, along with Improvement and Efficiency West Midlands, said that it was most important that inspection drove improvement and learning. They added that there was “an increasing lack of confidence in the current Ofsted regime which can often appear to undermine rather than support improvement”. Therefore, if Ofsted were to carry out inspections, a “recalibration and shift in philosophy” was required.

CfPS said that Ofsted should maintain its inspecting role although “recent failings” indicated a need to strengthen existing arrangements to be “more inclusive” and perhaps focus on “area-based inspections instead of service-based inspections”.

CIPFA and Solace were more agnostic about the organisation undertaking the inspection of services that protect and care for children and young people. CIPFA said: “The named organisation is less important than the effectiveness and the way that it deals with the outcome of the findings.” Solace said whichever organisation took on this role needed two things: “...the legal powers to pursue risk wherever it lies within public services and...the expertise to do this.” It said it remained “unconvinced” whether Ofsted met either of these conditions. Yet, it had “no in principle objection” if these conditions could be met within the current organisation. Solace added that it was “increasingly concerned” at the ability of the existing inspectorate to act independently, given that it is appointed and funded by government. It recommended that inspectorates should instead be “held to account and report to parliament” in a similar way to the National Audit Office. It said: “Fundamentally, inspection only works when the inspectorate is seen as credible and has the confidence of the inspected.”

Table 10: Is there a continued need for the inspection of councils' school improvement services?

	a) Chief executives and leaders: single and upper tier	b) Full sample
	Per cent	Per cent
Yes	62	54
No	31	22
Don't know	7	25
Total	100	100

Base: a) all chief executives and leaders from single and upper tier councils (86 respondents) b) all consultation responses (183 responses)

All respondents were then asked whether, in their view, there is a continued need for the inspection of councils' school improvement services. As Table 10 above shows, just under two thirds (62 per cent) of chief executives and leaders who responded from upper and single tier councils said that they did think that there was a continued need for this, whilst 31 per cent said that there was not. Seven per cent of this group answered ‘don’t know’.

A number of extended comments were made about the continued need for the inspection of councils' school improvement services. Statements of support, as with the previous question about inspections, were qualified. Several remarks centred on the conflicting accountabilities that now exist within the school system, with the introduction of free schools and academies. Relatedly, a collective officer response from one council disagreed with the need for continued support, saying that emphasis should be placed on “school outcomes” since coalition government changes to schools meant they had “insufficient levers to hold this responsibility”¹⁰.

¹⁰ South West council

ADCS said there was a continued need for the inspection of councils’ school improvement services. It elaborated by saying that, as with all inspection, the inspection of councils’ school improvement services “...must be fit for purpose and sufficiently nimble to be adapted to the context in which the local authority operates”. It gave the following example:

“...a local authority area where the overwhelming majority, if not all, of its secondary schools are academies, necessarily has different challenges and opportunities to improve school standards than a local authority area where a large proportion of its schools are maintained. In addition to inspecting a council’s school improvement services, there should be a comparable inspection of academy chains’ school improvement services... it is important for a single inspectorate to have a remit for the inspection of education and children’s services; it need not be the sole deliverer of some forms of inspection. What is clear is the need for a more sophisticated system that enables greater use of local knowledge and specialist knowledge.”

Solace felt a need for the inspection of councils’ school improvement services continued but only in areas of high risk:

“For example, an inspectorate to retain a reserve power to inspect in geographies where evidence from school inspections have identified the potential for significant failure within the local authority. We would also like to take this opportunity to re-highlight our concerns that, in some places, Ofsted appears to be inspecting school improvement services to academies – in direct contradiction to DfE policy that local authorities should not play a role in academy improvement. While we believe local authorities have a legitimate interest in the performance of all schools in their place, we cannot have a situation where the inspectorate takes a different view of local authority duties to the relevant government department.”

The West Midlands ADCS branch, and Improvement and Efficiency West Midlands, said there was not a continued need for the inspection of councils’ school improvement services. They added:

“There is an increasingly diverse and mixed economy which drives school improvement and to focus solely on the role of councils ignores this. There is the opportunity to evaluate the collective contribution that is made in a locality. This doesn’t need to be through inspection but more through a sector-led improvement approach which is predicated on understanding the performance across the board, the mechanisms for improvement and the contribution that all partners play in achieving this.”

Table 11: If you answered yes, should that inspection be carried out by Ofsted?

	a) Chief executives and leaders: single and upper tier	b) Full sample
	Per cent	Per cent
Yes	53	49
No	26	26
Don't know	21	25
Total	100	100

Base: a) all chief executives and leaders from single and upper tier councils who answered yes in Table 10 (53 respondents) b) all consultation responses who answered yes in Table 10 (97 responses)

Those respondents who answered that there was a continued need for the inspection of councils’ school improvement services were asked whether this inspection should be carried out by Ofsted. As Table 11 above shows, just over half (53 per cent) of chief executives and leaders who responded from upper and single tier councils said that this inspection should be

carried out by Ofsted, with the remainder of this group split between those who said that inspection of councils school improvement services should not be carried out by Ofsted (26 per cent) and those who answered 'don't know' – 21 per cent. Comments provided around this echoed previous comments made about the role and current approach of Ofsted outlined above.

Table 12: Should separate inspections of agencies contributing to the protection and care of children, such as councils, health and the police, be replaced by a single inspection of services across all agencies in an area?

	a) Chief executives and leaders: single and upper tier	b) Full sample
	Per cent	Per cent
Yes	80	72
No	7	6
Don't know	13	22
Total	100	100

Base: a) all chief executives and leaders from single and upper tier councils (87 respondents) b) all consultation responses (185 responses)

As outlined in Table 12 above, all respondents were asked whether separate inspections of agencies contributing to the protection and care of children, such as councils, health and the police, should be replaced by a single inspection of services across all agencies in an area. The majority of respondents were in favour of this, with 80 per cent of chief executives and leaders who responded from upper and single tier councils answering 'yes'.

A number of comments were made by professional organisations, and council officers and members, about the merits of replacing separate inspections with single inspections. ADCS said its members were "...wholeheartedly in favour of a truly multi-agency inspection of local area services for the protection, safeguarding and care of children and young people". It continued by commenting on the design of such an inspection, saying it must not simply evaluate how well agencies work together, but also the effectiveness of the contribution made by each agency in protecting, safeguarding and caring for children and young people. It said this required "effective cross-inspectorate collaboration" and "much smarter use of existing performance data" which had "failed to date". It said: "The imperative to do so has never been stronger; valuable opportunities to progress understanding and practices are being lost as a result of the failure at national level of the inspectorates to work together..."

The system-wide responsibility of child protection was also highlighted by the West Midlands branch of ADCS, and by Improvement and Efficiency West Midlands. They said owing to this joint responsibility it "makes sense to consider this through one common approach", but that "careful consideration" needed to be given to the contribution that inspection plays in a wider approach. CIPFA also pointed to the merits of such a system based on the "growing emphasis" on personalisation, place-based budgets and the customer-at-the-centre-of service-delivery. However, it added that substantial research was needed regarding how this might work in practice, and that challenges existed in the concept of generic inspection when many areas required informed and specific knowledge.

Three organisations made specific reference to "recent failings" in child protection which had included elements of "poor coordination" between public bodies. CfPS said given these failings it would "make sense" to join-up inspection activity, as long as it was carefully arranged to be as comprehensive as possible. CFOA said that thematic inspections or thematic approaches to sector-led improvement could assist in "...addressing the challenges of delivering services like child protection which do not fall within the remit of a single body". They continued by saying:

“If there are greater moves towards area based working across many areas of delivery, there will be a declining requirement for a focus on the sector-led improvement (or inspection) of organisations, and more of a focus on these same things, but relating to areas. Future peer challenge offers need to engage with this, but also to continue to provide space for specific organisations to focus on improving themselves.”

Chief Fire Officers Association

Despite general agreement that a single inspection of services was necessary, the following issues were raised.

There were concerns about:

- the scale of the task and the need for careful thinking
- logistics, or the manageability, of a multi-agency inspection (e.g. coordinating such inspections in councils covering large geographical areas, the impact on local resources and disruption of day-to-day operations)
- the complex nature of such an inspection (e.g. it is already a challenge to pull together key lines of enquiry across the current scope of inspection in children’s services, and inspection frameworks for individual services are too different from each other, as illustrated in previous joint area review (JAR) inspections and Ofsted’s integrated inspections pilots)
- generating radical change across all inspectorates
- the ability of inspectorates to sustain consistency across all agencies and be in a position to make accurate and consistent judgements about services provided to children
- using representatives from the existing regulatory bodies (rather than a multi-agency team with experience of working together for the greater good of children, not fighting for each agency’s agenda).

There were questions about:

- accountability and responsibility (e.g. if a council’s partners ‘fail’, or if ‘poor quality’ is identified, how will this reflect on the council and how will accountability be shared)
- the specific inspection criteria
- the possibility of creating silo-working that ignores the contribution of local agencies
- returning to something similar to the old JAR methodology.

Table 13: If a new multi-agency inspection for the protection and care of children is developed, should this be delivered through Ofsted, another existing inspectorate or a new inspectorate?

	a) Chief executives and leaders: single and upper tier	b) Full sample
	Per cent	Per cent
Ofsted	23	14
Another existing inspectorate (e.g. Care Quality Commission, Her Majesty's Inspectorate of Constabulary, Her Majesty's Inspectorate of Probation)	2	5
A new inspectorate	50	43
Don't know	24	38
Total	100	100

Base: a) all chief executives and leaders from single and upper tier councils (86 respondents) b) all consultation responses (182 responses)

Respondents were then asked, if a new multi-agency inspection for the protection and care of children was developed, whether it should be delivered through Ofsted, another existing inspectorate or a new inspectorate. As Table 13 shows, the most popular response was a new inspectorate (50 per cent of chief executives and leaders who responded from upper and single tier councils selected this option), followed by Ofsted (23 per cent of this group). Just two per cent of this group thought that any new multi-agency inspection should be run by an existing inspectorate other than Ofsted.

ADCS said, on balance, its members did not think a brand new body would address the serious failings to date – even though the idea was appealing given current levels of dissatisfaction with Ofsted and CQC. Establishing a new body, it said, would be time-consuming and expensive, and would require TUPE-ing or transferring existing inspectors, thus perpetuating existing problems. However, using an existing inspectorate to deliver a “truly multi-agency inspection” was difficult it said because multi-agency inspection “...cannot de facto be institutionally focussed”. Overall, ADCS made this point about developing a new multi-agency inspection for the protection and care of children:

“Whether a new inspectorate is created, or one of the existing inspectorates is given the lead, what is absolutely clear is that the legislative position must be clarified. Whichever inspectorate leads on multi-agency inspection it must have the legal authority to judge the effectiveness of all relevant local agencies. This is likely to be a complex legislative matter, and the government must address it.”

Association of Directors of Children’s Services

There were some comments in support of Ofsted delivering a new multi-agency inspection for the protection and care of children. For example, the chief executive of one council said: “Ultimately the director of children’s services is accountable [for the protection and care of children] and this would, therefore, tend to suggest that Ofsted should be the lead mechanism, as the relationships and accountability lines are clear.”¹¹ But, there were some concerns about the cost of setting up a new multi-agency inspection, and also how it would be staffed.

Additionally, the National Audit Office set out their understanding of the role played by Ofsted (i.e. to report on compliance with standards and guidance that are a legal requirement on the

¹¹ North East council

local authority). It said any replacement regime should "...demonstrate that it has the expertise to improve outcomes for the inspected service". It referred to its recent report on inspections – 'Inspection: A comparative assessment (2015)' – which examined the work of the five criminal justice inspectorates. The report highlighted that the bodies under focus were under a statutory duty to co-operate and consult in relation to their inspection activity. It said, in relation to child sexual exploitation (CSE), "formalised co-operation" among existing inspectorates might form an alternative to the creation of a new framework or inspectorate.

Three professional organisations said it was more important to focus on *what* a new multi-agency inspection would deliver in terms of protecting and caring for children rather than *who* actually carried out inspections. For instance, CfPS said: "It does not matter who inspects as long as the framework is comprehensive."

Further support for children's services

Respondents were asked if councils need further support, such as bespoke models of peer review for CSE or schools improvement, to meet the challenges faced in children's services. If 'yes', respondents were asked to provide further details (some respondents who said 'no' also explained their response). Overall, there were almost four times as many comments in favour of additional support than for no additional support. It should be noted that some respondents who rejected further support did so because they were satisfied with the current arrangement.

Around two thirds of respondents answered this question, signalling their support for, or opposition to, further support. Broadly, those in favour of further support referred to the following topics:

- Specific issues of child safety (or 'wicked problems') such as CSE, child trafficking and radicalisation. Some respondents spoke about the sector needing to "sort out" its priority issues (e.g. child safeguarding), and "learn the lessons" from recent high-profile cases. Examples of potential support included dedicated work on tackling CSE, a more robust framework to identify and manage risk, improved cross local authority working, increased funding to strengthen provision, greater sharing of best practice, and peer-support such as a CSE-specialist team of peer reviewers.

"Due to the sensitivity and specialised nature of the reviews [e.g. CSE and schools improvement] of this type a bespoke model may provide a more effective method for peer review."

Chartered Institute of Public Finance and Accountancy

"We do believe there is the need for a bespoke peer review model around CSE. More generally, we believe the peer review model should have sufficient flexibility to effectively focus on the specific challenges and needs of individual places, informed by both their own self-assessment and by the themes and patterns emerging from previous reviews."

Society of Local Authority Chief Executives and Senior Managers

"...recent experience seems to indicate that, for issues like safeguarding and CSE, some councils have insufficient expertise and experience at the moment to deal with this effectively. A peer review process could help to provide supportive collaboration, sharing of high quality practice, better performance data and information to drive forward service improvement..."

South East council

“Support to councils to deliver better children’s services is an important area for consideration. There is a lack of focus on sector improvement and this is potentially a significant flaw, particularly when one considers highly important national issues such as CSE, adoption, children’s placements and agency staff. Leaving each local authority to fend for themselves has not been particularly successful and national strategies need to be considered more carefully.”

London Borough

“There is the need for a bespoke peer review model around CSE. More generally, the peer review model should have sufficient flexibility to effectively focus on the specific challenges and needs of individual places, informed by both their own self-assessment and by the themes and patterns emerging from previous reviews. The LGA, and the wider sector, has a legitimate role identifying emerging risks and therefore partially directing where, when and what is reviewed rather than leaving all of the initiative to individual authorities...”

North West council

- Notwithstanding the above, other respondents said a wider remit for further support was needed. Any support offer, they said, should be extendable or adaptable to whatever challenges arose, or even linked to areas of service/performance rather than topical issues. Comments included:

“...CSE is about local government not children’s services...”

South East council

“We would caution against too many bespoke models of peer review which focus on narrow areas. We believe all the issues cited are interlinked and a holistic view is required. Lots of small specialist review areas risk the danger of overlap and of leaving gaps...”

Yorkshire and Humber council

“...the LGA should develop its offer based on what councils and regions understand to be their key issues. We need to avoid prescribing responses based on particular live national issues.”

Improvement and Efficiency West Midlands and West Midlands ADCS

- Schools improvement support. Some respondents said school improvement support would be helpful, but they also highlighted the changing context of the school sector, for example, conflicting accountabilities.
- Bespoke support for specific needs. Some respondents said bespoke support was important. This could include support for specific services, council staff, elected members and statutory boards.
- Special educational needs and disabilities (SEND). Some respondents referred to support for SEND.

“...Councils might benefit from additional support with a focus on SEND – where the challenges are many – not least rising demand and cost in children’s services and growing expectations from parents (and government) about the support families can expect when children are under aged 18, set against a

recognised cliff edge of support as young people transition into adult services and the fact that the high level of support expected in children's services doesn't help families plan for and build resilience to succeed in independence in later life."

East of England council

Several respondents reflected on sector-led improvement work that had proved effective for their local areas, and could possibly be adopted elsewhere. This included peer challenges, self-assessment and use of performance dashboards. Some highlighted improvement work being carried out by other organisations such as the ADCS. Some examples are:

"London has just completed a peer review of CSE across all boroughs through a partnering arrangement and this was hugely helpful."

London borough

"The development Project Phoenix [multi agency team working in child protection] across the ten districts in Greater Manchester is the way forward, where there is shared intelligence and data sharing."

North West council

"...successful regional sector-led improvement programmes such as in Yorkshire and Humberside have seen the benefits of the beginnings of such a process...In Yorkshire and Humber the sector-led improvement model covers key areas including school improvement and thus one model has been found to be sufficient to cover the key challenge areas of children's services. The only thing that is missing at present is that formal link into the inspection process to ensure a continuous improvement cycle is in place."

Yorkshire and Humber council

Aside from the specific focus of support offered, several respondents, including ADCS, referred to the ways in which it might be provided. They spoke in favour of support, but qualified their comments in relation to the following conditions. They said further support should:

- ...have a multi-agency lens. Some respondents were in favour of further support, but said the offer needed to be broadened to include other agencies and statutory bodies (and also two-tier local authority working). They spoke of the need for a more integrated approach, which should include experts in specific fields plus experts in peer challenge methodology and performance metrics.
- ...be included in the current arrangements. These respondents said there were too many peer vehicles, and that a separate system was not required. There was some disagreement, however, amongst a small number of respondents, as to whether sector-led improvement should feed into Ofsted inspections (e.g. as part of a pre-Ofsted programme), or if there should be sparing use of Ofsted and more emphasis on peer support.
- ...be flexible and proportionate. Respondents said further support needed to be open to changing environments, expectations and new issues.
- ...serve as a positive process i.e. it should focus on achieving better outcomes and not apportion blame. Some respondents said peer support should be offered on needs-driven basis, but it was not always clear if they thought the process should remain voluntary.

- ...use high quality peers. Some respondents said peer reviews needed to include the right people to avoid 'lacking teeth'. Reviewers need to have up-to-date knowledge and experience.
- ...be sufficiently resourced. Some respondents reflected on the need to invest more in strengthening peer improvement work and ensuring the necessary skills for peer review were available, or to source these skills externally (including working with other councils).

Other respondents referred to specific tools which they said would prove helpful. These included an LGA performance checklist, a brokerage service for providing specific support from 'outstanding' authorities, sector mentors, ring-fenced budgets, and a focus on prevention.

A number of respondents also spoke about receiving support via sharing of best practice and innovation. One respondent spoke in favour of diagnostic tools rather than the peer review process, and another said more research was needed including "what's required to resource safe, effective children's services..."

Broadly, those respondents opposing further support, of which there were far fewer than the above, spoke about these issues:

- The current system works well. These respondents said the current inspection regime was robust, and that Ofsted provided a range of tools and good practice reports. The sector-led improvement peer review process was also said to be operating well.

"No [further support is not required]. The current sector-led improvement peer review process in children's services is working very well and councils can choose a specific line of enquiry (such as CSE) within the existing review process."

North West council

"No [further support is not required]. The inspection regime is already extremely robust and also demanding of staff and manager capacity at a time of shrinking resources. If as an authority we wish to seek an expert peer view on any aspects of our services, then we already know expert people in the field whom we can call on and pay to undertake bespoke work. Regionally authorities do need to explore mechanisms for the sharing of best practice; but our view is that we do not at present need a separate regime of routine peer review processes to deliver this."

North West council

- Focus on intelligence sharing as a form of support. Some respondents said there should be a greater emphasis, and more honest sharing, of what works and what doesn't work in children's services.

"I'd say no. Government is full of experts in hindsight. How do we share, in a safe environment, emerging threats, trends, patterns which highlight problems in real time? Could we establish a MASH (Multi Agency Safeguarding Hub) national intelligence network/hub, if it doesn't already exist?"

North West council

Adult social services and health

Respondents were asked if they had anything to say about the arrangements and support put in place to help councils and their partners implement changes across adult social care and health programmes. Around half of respondents provided a response to this question.

About a quarter of those who responded said they welcomed sector-led improvement work in health and adult social care and/or that it was working well for them. For example, they said the process was “outcomes focused”, helped to identify “what ‘good’ looks like”, and ensured that the “customer experience was at the heart of the model”. Other comments included:

“Support through a... peer challenge proved beneficial with a balanced, knowledgeable, peer challenge team providing encouragement and critical friend advice which recognises the areas where we are performing well and others where there is scope for improvement.”

East Midlands council

“This [the arrangements and support put in place to help councils and their partners implement changes across adults and health] has been a good improvement. It has greatly assisted in benchmarking and understanding. It helps to know that you are not the only one who has a problem and how others have developed solutions.”

East Midlands council

“Sector-led improvement in adult social care has been embraced very pro-actively and constructively in the Yorkshire and the Humber region, with a robust, regional, five-stage approach agreed across the 15 councils through their directors of adult social services. This regional improvement programme has been very successful in identifying strengths and areas for development in adult social care across the region and putting in place support to make the necessary improvements, and therefore driving up standards and performance.”

Yorkshire and the Humber council

A number of respondents listed the benefits of sector-led improvement work across adults and health programmes, which included highlighting areas of existing good practice and areas requiring greater focus, raising awareness of national concerns, confirmation from the sector that services were being well-delivered, sharing of experiences, benchmarking assistance, development of solutions – and generally driving improvement. Some expressed their ongoing commitment to the current arrangement and support in place across adults and health programmes. For instance:

“With regards to adults, a sector-led approach is far better as councils are equipped to assess strengths and weaknesses and support fellow councils to improve their performance...”

London borough

In their commentary, however, about a quarter of those responding highlighted the need for better integration between adults and health programmes – and also the need for a place-based approach. Other comments included the need for a multi-agency inspection regime, joint leadership across the NHS and public health, and training (such as training for NHS staff about local government workings). For example:

“A more cross-cutting approach may be useful when, for example, you see the penetration that Fire and Rescue Services have in assisting the elderly and vulnerable stay in their homes longer and the safety of residents generally i.e. tele-care.”

South East fire and rescue

“I don’t think those not in the direct business (but who can offer added value) are aware of the arrangements – different parts of the public service sector are unaware of one another’s programmes and yet so often could add value e.g. districts to health programmes (through their statutory and non-statutory functions), fire to troubled families or health to economic sustainability through adult care programmes.”

South East council

“As with children’s services the differing requirements of regulatory bodies on partners makes integrated working even more difficult. NHS England, Monitor, CQC [Care Quality Commission] etc. all add complexity and sometimes requirements that are the opposite of an integrated approach. There needs to be one referee and one set of rules.”

North West council

A number of respondents spoke, both positively and negatively, about the LGA’s grant-funded programmes, namely Better Care Fund, Care Act 2014, the Winterbourne View Joint Improvement Programme (now known as Transforming Care) and Towards Excellence in Adult Social Care (TEASC). Examples of positive comments were:

“Care Act implementation support to local authorities and regions through the Joint Programme Management Office has been particularly useful. The various sources of funding received have enabled the region to recruit a Care Act lead and to focus on regional priorities whilst also maintaining strong links to national priorities. We have designed our own programme which has been supported by the national analysis provided through the Care Act stocktakes and self-assessment tools which have been used at a local level...”

North East council

“...we believe there is much to be commended in many of the grant-funded programmes to support changes across adults’ services and health. In particular, we welcome the flexible and non-parochial way in which they work across local public services.”

Society of Local Authority Chief Executives and Senior Managers

While some praised the LGA’s grant-funded programmes in supporting changes across adults’ services and health, criticisms were also raised. For example:

“There needs to be a stronger local government grip and ownership on the processes associated with making a success of the Better Care Fund.”

South East council

“My only comment is that the LGA’s involvement in the Better Care Fund doesn’t appear from my perspective to have slowed the relentless centralism of the DH [Department of Health] which has stifled innovation and local creativity.”

South East council

“There appear to have been some knee-jerk reactions to situations rather than carefully planned projects/programmes of activity. A specific example is the implementation of the Care Act...”

North West council

Additionally, although Solace commended some of the features of the LGA’s grant-funded programmes, it also applied a note of caution:

“We also recognise that much of this work [i.e. adults and health programmes] is grant-funded by the Department of Health. While we welcome the resource available to support such activity, we would urge the LGA not to allow these programmes to be excessively dominated by the needs of the Government department funding them. Such programmes should not slip across the boundary that separates genuinely sector-led activity from activity which is merely sector-delivered. This may also require efforts to rebalance the contribution made by the Government and by the sector itself.”

Society of Local Authority Chief Executives

The least positive feedback, albeit small in number, about the arrangements and support put in place were that it was “too prescriptive”, “too messy/confusing”, without a “mandate”, failing to “add value” – and that restructuring within the health sector was not coterminous with local government.

A number of suggestions were made about support within adults and health programmes across the regions that might strengthen the approach and build confidence. These included the need for:

- a clearer sector-led improvement agenda (more consistent approach, less fragmentation, fewer players, quicker pace of change) – and a supportive narrative that doesn’t blame one part of the system/sector or another
- a greater focus on cross-council collaboration, cross-agency activity, cultural/systems change, early intervention and prevention
- more involvement from the sector in designing support programmes (including a mutual dialogue with councils prior to a peer review)
- improved governance, accountability and a clear financial management framework
- more anticipatory work (e.g. improving the sector’s ability to identify early the antecedents of decline and failure – stepping in before central government)
- triangulation of qualitative and quantitative data (e.g. to understand which interventions have been most successful in reducing demand and cost across health and care services)
- more advice on how to join-up health and adult social care services
- increased capacity for sector-led improvement within councils to ensure its full delivery

- greater flexibility (reflecting changes in the public sector and local areas e.g. Manchester devolution) – including a placed-based approach
- recognition of contribution of district authorities within peer reviews, consideration of the impact of district councils on adult and health agenda
- stronger ‘teeth’ within the peer review process
- more information about what success looks like in terms of a council’s improvement journey
- application of caution in using Adult Social Care Outcomes Framework (ASCOF) measures to evidence the success of sector-led improvement
- clarity about the Adult Improvement Advisers role
- greater opportunities for shared learning.

Finally, ADPH expressed its disappointment at the lack of consideration given to public health in the ‘Taking Stock’ consultation. It said, while it understood that the consultation stemmed from a review into sector-led improvement programmes within children’s and adults’ services, it was disappointed to note that the advent of public health in local authorities had not been mentioned as needing to be considered as part of the system. It said:

“Existing peer reviews (such as health and wellbeing, and childhood obesity) are very much about public health; public health will be a key element of place-based integrated health systems...”

Association of Directors of Public Health

Annex A: Consultation questions

The full consultation document can be accessed here: [Taking stock – where next for sector led improvement?](#) The full set of questions is also outlined below.

1. Given the current and future challenges facing the sector, are the principles on which sector-led improvement is based still the right ones?

Yes, they are still all relevant exactly as they are
Yes they are generally relevant, but I suggest some changes
No, none of them are relevant now
Don't know

2. If you answered no, or suggested changes, what would you suggest as alternatives/additions?

3. How should the increasing role that councils play in working with other parts of the public sector on a place-based approach be reflected in sector-led improvement?

4. Is there more that all councils should do to strengthen local accountability in their areas? If so what?

5. Do councils or the LGA need to do any more to ensure that local people and others have the comparative performance data they need to hold councils to account? If so what?

6. Is there anything more that needs to be done to help councillors exercise effective scrutiny?

7. Do you have any views on the core components of a corporate peer challenge?

8. Should all authorities be expected to have a corporate peer challenge on a regular basis, say every four years?

Yes
No
Don't know

9. Should all corporate peer challenge reports be published?

Yes – all should be published
Yes – unless there are exceptional circumstances
No – this should be a matter of local choice
Don't know

10. Should all authorities be expected to produce an action plan following a peer challenge?

Yes
No
Don't know

11. Are there other things we should do to limit government's potential appetite for inspection?

12. What changes would you like to see from the LGA's improvement offer?

13. Is there a continued need for the inspection of services that protect and care for children and young people?

Yes
No
Don't know

14. If you answered yes, should that inspection be carried out by Ofsted?

Yes
No
Don't know

15. Is there a continued need for the inspection of councils' school improvement services?

Yes
No
Don't know

16. If you answered yes, should that inspection be carried out by Ofsted?

Yes
No
Don't know

17. Should separate inspections of agencies contributing to the protection and care of children, such as councils, health and the police, be replaced by a single inspection of services across all agencies in an area?

Yes
No
Don't know

18. If a new multi-agency inspection for the protection and care of children is developed, should this be delivered through Ofsted, another existing inspectorate or a new inspectorate?

Ofsted
Another existing inspectorate (e.g. Care Quality Commission, Her Majesty's Inspectorate of Constabulary, Her Majesty's Inspectorate of Probation)
A new inspectorate
Don't know

19. Do councils need further support, such as bespoke models of peer review for child sexual exploitation or schools improvement, to meet the challenges faced in children's services? If so, what?

20. Do you have any comments about the arrangements and support put in place to help councils and their partners implement changes across adults and health programmes?

21. Do you have any other comments about the current approach to sector-led improvement?



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