



National Centre for Excellence in Residential Child Care

#4 NCERCC series re Ofsted guidance Registering a multi-building children's home¹

Missing documents and absence of usual steps of development and scrutiny mean the Ofsted 'multi-homes' guidance must be halted.

The development of this policy and practice is significantly different than usual in that important steps are missing.

NCERCC is not aware of any factor why the circumventing of established steps is needed or justified.

The absences are significant and make this policy and practice being released as guidance extremely problematic.

Knowing this, continuing should not be an option.

The usual procedures have stood the test of time and are pains-taking for reasons of safety and credibility.

There are, at least, 3 absences from supporting documentation. At present a literature review, international practice report, and an impact assessment are all absent.

These 3 provide a strong foundation for any policy and practice development.

These being absent, at present, the guidance is without foundation.

This leaves the development based in expediency. If it is the case, what is the case for this expediency? Expediency never makes for good policy or practice.

First in the usual pains-taking procedures there is a testing of evidence

1. A literature review is essential.

NCERCC is unaware of a literature review underpinning this guidance.

¹ **NCERCC previous in this series** Thank you all for the positive response praising the accuracy and advocacy in raising the issue.

[NCERCC critical appraisal of Ofsted guidance Flexible provision – NCERCC](#)

[We cannot take one single step towards to the return to institutionalised thinking or practice – NCERCC](#)

[Zaphod Beeblebrox applies to be a multi home registered manager – NCERCC](#)

Currently a literature review is absent from the documentation.

What evidence has been considered? Where is the presentation of that evidence and what opportunity has been given for the evidence to be tested or publicly scrutinised?

2. A comparative international policy and practice report is advisable.

NCERCC is unaware that such an exercise has been conducted. NCERCC is asking international colleagues for any examples.

The context in which seemingly similar situations differ according to culture is important to know. It often is not as simple as transporting an idea or practice, there is the need for translation and a great number of additional supports and structures to be put in place to assure the fidelity of the idea. The reasons and factors involved as to why a practice can evolve in one place need to be known. NCERCC is aware that members of the Ofsted National Consultative Forum gave examples of one RM across multiple homes. The examples have particular factors involved that need further analysis and understanding. There may be alternative practices that would be beneficial and preferable. If the wide social work/care sector is not asked then we cannot contribute. The usual pains-taking method creates and then converges. Here the process seems to have been reversed

The testing of evidence guides developments so as to avoid being left unprepared for what may occur, including potential dangers. What often arises from this work is the conclusion that it is better not to do something no matter that it may seem a pragmatic quick fix/win.

Once an idea is formulated it needs the test of experience through consultation (see #3 below). This provides an answer to the question, 'Is it practicable'?

3. Impact assessment.

This has not been published.

It will need to include important aspects regarding children and staff.

Children

The Ofsted SCCIF puts “focus on the experiences and progress of children. We regularly ask children, and the adults who look after them, what matters most about children’s experiences and progress.”

The views of children need to be known.

Additionally, it will be beneficial to include in consultation formerly looked after children. Especially important insights will be those experiences of living in larger homes than those of today, especially those requiring moves within one home.

NCERCC will publish extracts from the government publications that first highlighted the adverse impact of this practice.

What were the conclusions regarding the effects on the wellbeing of children? What were the conclusions regarding the safety of our children? What is the impact of additional placements internal moves? Or would a placement in a multi-home not count as a placement move as it is 'internal'? Is moving between the different houses of the multi-home to be recorded as a placement move? Certainly under the current regulations movement between two homes operated by the same provider is considered to be a placement change.

The experience of children seems not to have been central to the thinking. If the experience is of a placement move then it is a placement move.

How does this guidance meet the requirements of the SCCIF?

The overall experiences and progress of children

Areas of required evidence are:

- the quality of individualised care and support provided and the influence and impact of the home on the progress and experiences of children
- the quality of relationships between professionals, carers and children and their parents
- the progress children make in relation to their health, education, and emotional, social and psychological well-being
- how well children's views are understood and taken into account, and how their rights and entitlements are met
- the quality of children's experiences on a day-to-day basis
- how well children are prepared for their futures and how well transitions are managed
- how well the home ensures that the needs of children who live far from their home area are met

The experiences and progress of children are likely to be judged good if there is evidence of the following: how does the guidance meet this standard?

- Children are enabled to build trusted and secure relationships with adults who are looking after them. Staff know the children well, listen to them, invest time in them, protect them and promote their welfare. Children are able to develop an appropriate sense of permanence and belonging.

Staff

The views of staff need to be known, perhaps in a workforce assessment.

Workforce assessment

- Impact of cumulative stress on RMs as their workload is increased?

- Impact on cumulative stress on leaders of the constituent homes increases too. Will people want that?
- Impact on recruitment. Does it increase attractiveness of the role? Research shows people are attracted to making a deep and sustained difference through leading and shaping practice and avoid administrative positions.
- Impact on salaries, of managers, and leaders?
- Impact on the necessary workforce development for leaders of individual homes?
- Impact of necessary new qualifications for leaders of constituent homes?

The SCCIF: “Adults can only support children well if they’re given the time, resources and information they need to do this, so we also take account of the quality of the support that the adults who care for children receive.

So, what? This is a question Ofsted has applied to its inspection work.

Evidentially there are absences from the usual pains-taking procedures.

As this policy and practice change has appeared as guidance there appears to be no move for the assurance through challenge provided in a public consultation.

Is there a reason why discussions were not held in, or made public?

Missing one step is significant, if compounded by more following and our cumulative anxiety should grow and be firmly expressed.

There is safety in the usual procedural steps unless and until new methods based on consultation, testing, review and time are demonstrably superior. They ensure the safety of children.

The usual procedures need to be upheld.

Clearly there appear to be absences in the preparation of the proposal and guidance.

NCERCC has been advised the gestation of the guidance took 8 months, time enough for all steps to have been undertaken, for consensus and challenge to have produced honed conclusions. (NCERCC will publish alternatives as part of this series).

The truncated method that has been followed in the making of this idea has never previously been seen.

There are basic foundational steps that must be taken and subjected to public review/scrutiny.

It is necessary to be creative and clinical, rather than convergent, and to patiently follow the usual ways that provide safety and security for children.

If it is that there has been no objection voiced to the guidance, then based on evidence previously published and the above then this is to be lodged as the first objection