

NNPCF response to Ofsted consultation: Improving the way Ofsted inspects children’s social care

September 2026

About this response

The National Network of Parent Carer Forums (NNPCF) welcomes the opportunity to respond to Ofsted’s consultation on proposed changes to the Inspecting Local Authority Children’s Services (ILACS) framework. Our response concentrates particularly on meaningful engagement and co-production with children, young people, parents and carers, and on the role that Parent Carer Forums (PCFs) can play where inspection activity concerns disabled children and children and young people with special educational needs (SEND).

NNPCF supports Ofsted’s stated ambition that the voices of children, young people, parents, carers and families should be at the heart of inspection. To achieve this, engagement needs to be designed into the inspection methodology rather than treated as an additional activity. Inspection should test not only whether local authorities consult families, but whether they routinely work with them as strategic partners: identifying priorities, designing services, reviewing impact and acting on feedback.

PCFs provide a valuable source of collective, strategic parent carer insight. Their role should complement, not replace, direct engagement with individual families, children and young people, care-experienced people and other representative groups. This distinction is important: a PCF can identify recurring themes and system-wide patterns, while individual families can describe the lived impact of services and decisions.

Alongside this consultation response, NNPCF has also written directly to Sir Martyn Oliver, His Majesty’s Chief Inspector, to highlight the opportunity to establish a clear and consistent role for PCFs within relevant ILACS inspection activity. We have particularly encouraged Ofsted to build on the learning from PCF involvement in Area SEND inspections and to consider how greater alignment and sharing of intelligence between the two inspection frameworks could strengthen inspectors’ understanding of the experiences of disabled children and children and young people with SEND. We have also offered to work constructively with Ofsted on the development and testing of the detailed ILACS approach to parent carer engagement, PCF involvement and co-production.

NNPCF’s key recommendations

- Make meaningful engagement and co-production with children, young people and families an explicit cross-cutting expectation in every ILACS evaluation area, including the impact of leaders.
- Where inspection activity relates to disabled children and children and young people with SEND, include the local PCF as a recognised strategic stakeholder and source of evidence, alongside direct engagement with families and other representative groups.
- Build a consistent minimum offer for family engagement into ILACS: early notification, accessible information, independent routes to contribute, sufficient time to respond, a structured meeting with representative groups, and feedback on how family evidence informed inspection lines of enquiry.

- Use the established Area SEND inspection approach as a useful model for structured PCF involvement, while adapting it appropriately for the broader children’s social care remit.
- Inspect the quality of local co-production itself: whether families are involved early enough to influence decisions, whether a diverse range of voices is heard, whether feedback loops are closed, and whether leaders can demonstrate what changed as a result.
- Ensure report cards show clearly what inspectors heard from children and families, how this evidence was triangulated, and what the findings mean for children and families in practice.
- Avoid over-reliance on quantitative survey data. Surveys should be one route among several and should be interpreted alongside qualitative evidence, demographic context and evidence about who may be missing from responses.
- Co-produce the detailed ILACS toolkits, engagement methods and evaluation criteria with children, young people, parent carers, PCFs and other relevant family organisations before implementation, and include them in testing and evaluation of the renewed framework.

Proposal 1: The content of the ILACS framework

What do you think about the proposed statement of ambition for children’s social care inspections in relation to ILACS?

The NNPCF supports the direction of the proposed ambitions, particularly the commitment that the voices of children, young people, parents, carers and families should be at the heart of inspections and that they should be routinely and meaningfully involved in the development, implementation and delivery of inspection frameworks.

The NNPCF would strengthen this by using the language of co-production as well as engagement. Engagement can describe a wide range of activity, from providing information to consultation. Co-production requires a stronger and more reciprocal relationship in which people with lived experience are involved early enough to influence priorities, design, delivery and review.

The renewed ILACS framework should therefore test both the experience of individual children and families and the maturity of the local authority’s arrangements for strategic co-production. Inspectors should look for evidence that leaders understand recurring themes from families, involve them in improvement work, respond transparently to challenge and can demonstrate the difference that participation has made.

For disabled children and children and young people with SEND, the local PCF should be recognised as an important strategic partner. PCFs bring a distinct and complementary perspective to inspection. Alongside direct engagement with children, young people and individual families, PCFs can provide collective strategic evidence drawn from the experiences of parent carers across the local area, together with an understanding of local services and support and how these are experienced by and impact on families. This evidence can help inspectors identify recurring themes and system-wide patterns, as well as test whether leaders’ understanding and self-evaluation reflect the experiences of families in their local area.

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

Inspection should place particular emphasis on whether services are organised around the child and family rather than around organisational boundaries. Children with complex lives are often supported by multiple services across social care, education and health. Inspectors should therefore examine the quality of multi-

agency planning, transitions, communication with families, timeliness of support and whether families repeatedly have to retell their story or coordinate services themselves.

Families and representative organisations can provide important evidence about where systems work together well and where gaps occur between services. Where children are disabled or have SEND, inspectors should seek evidence from the PCF and from individual parent carers about access to social care support, short breaks, assessments, transitions, safeguarding, family support and the interface between social care, education and health.

Inspection should also consider whether local authorities actively seek out the experiences of families who are less likely to participate in established engagement routes, including those experiencing crisis, families facing language or communication barriers, and those whose children have profound or multiple needs.

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

Inspectors should test whether commissioning and sufficiency decisions are informed by a rounded understanding of local need, including lived experience and family feedback. Evidence should include not only placement and service data, but what children and families say about accessibility, suitability, stability, distance from home, continuity of relationships and the impact of gaps in local provision.

Local authorities should be able to demonstrate how children, young people and families have contributed to needs assessment, commissioning intentions, service design and review. Where relevant, PCFs can provide strategic evidence about recurring gaps affecting disabled children and children with SEND, including whether support is available early enough to prevent escalation.

The framework should encourage a clear feedback loop: local authorities should be able to show what families told them, what they did in response, and how they evaluated whether the change improved experiences and outcomes.

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

The NNPCF recommends that the detailed evaluation criteria consistently ask three linked questions: what do children and families experience; what do leaders know about those experiences; and what have leaders changed as a result?

This would help prevent inspection becoming overly focused on processes, structures or compliance without understanding their impact. It would also strengthen accountability for co-production and learning.

Inspection evidence should include the experiences of children and families who do not fit neatly within one service pathway, including disabled children and children with SEND who may interact with early help/Family Help, children in need, safeguarding, short breaks, transitions and adult services. Inspectors should be alert to differences between strategic policy and families’ day-to-day experience.

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

The NNPCF supports the proposal to make engagement with children, young people, parents, carers and families a cross-cutting theme across all evaluation areas. This is stronger than locating family voice in one isolated judgement.

However, the detailed toolkit will be critical. Evaluation criteria should distinguish between informing, consulting, engaging and genuine co-production. A local authority should not be able to demonstrate strong

practice simply by showing that engagement activity took place. Inspectors should consider reach, accessibility, representativeness, influence, feedback and impact.

The ‘impact of leaders’ evaluation area should explicitly consider the quality of strategic co-production and whether leaders use collective lived-experience evidence in governance, commissioning, quality assurance and improvement. For SEND-related social care, evidence should include how leaders work with the PCF and other representative groups and how this connects with the wider local area SEND partnership.

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

The NNPCF can see the rationale for locating strategic responsibility for sufficiency and the use of unregistered provision within the impact of leaders evaluation area, provided inspectors continue to give substantial weight to the lived impact on individual children and families.

Leadership scrutiny should include whether leaders understand current and future local need, whether commissioning is informed by children and families, and whether gaps in provision are identified early. Where disabled children and children with SEND are affected, PCF intelligence can help identify recurring pressures, but this should be triangulated with direct evidence from children and families with experience of placements and provision.

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

The NNPCF agrees that the use of illegal unregistered provision is sufficiently serious to require clear scrutiny and accountability. The application of any limiting criterion should remain proportionate and should consider the circumstances and impact on children, while maintaining an unambiguous expectation that children should receive safe, lawful and appropriately regulated care.

Inspectors should hear directly from affected children and families wherever it is safe and appropriate to do so, and should examine whether leaders understood the child’s needs, explored suitable alternatives, maintained oversight and relationships, and acted to reduce the likelihood of similar situations recurring.

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

A strengthened focus on sufficiency is welcome. Sufficiency should be understood as more than the number of placements or services available. Inspection should consider whether provision is appropriate to children’s needs, available at the right time, close enough to maintain important relationships where appropriate, culturally responsive and capable of supporting children with complex or specialist needs.

Children, families and representative groups such as PCFs should contribute to the evidence base about sufficiency. Local authorities should be expected to demonstrate how lived experience has informed sufficiency strategies and commissioning decisions, and how they know whether commissioned provision is meeting need in practice.

Proposal 2: How Ofsted grades ILACS

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

The NNPCF supports greater transparency and consistency in how inspection judgements are reached. A secure-fit approach could help if the evaluation criteria are clear, proportionate and focused on impact rather than becoming a compliance checklist.

The criteria should make explicit how evidence from children, young people and families contributes to judgements. Strong or exceptional practice should require more than evidence that engagement mechanisms exist: leaders should be able to demonstrate meaningful co-production, a diverse evidence base, responsive leadership and tangible improvement resulting from lived-experience feedback.

Ofsted should also guard against a single shortfall within a broad evaluation area obscuring otherwise strong practice where the shortfall is limited and leaders are already responding effectively, consistent with the consultation’s stated intention to retain fairness and proportionality.

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

The NNPCF recognises the intention to provide greater nuance. For families, the usefulness of the new scale will depend on whether the distinctions between grades are clear, understandable and consistently applied.

The narrative accompanying each grade will be particularly important. Families need to understand what the judgement means for children in practice, including where experiences differ between groups of children. Ofsted should test the terminology and presentation with children, young people and families before implementation and provide accessible explanations of the new scale.

What do you think about the proposed ILACS grade descriptions?

Exceptional

The NNPCF support the expectation that exceptional practice should make a significant and lasting positive difference to children’s and families’ lives and that this should be sustained over time.

For a local authority to be judged exceptional, there should be clear and consistent evidence that positive experiences and outcomes are being achieved across different groups of children and families, including children and young people with SEND and those who may experience additional barriers to accessing support.

Evidence should include direct engagement with children, young people and families, alongside collective strategic evidence from Parent Carer Forums (PCFs). PCFs can provide valuable insight into families’ experiences, knowledge of local services and their impact, helping inspectors identify whether high-quality practice is embedded across the system rather than demonstrated through individual examples of strong practice.

We would also expect evidence that the local authority has effective mechanisms for listening and responding to children, young people and families and that their experiences contribute to learning and service improvement.

Where practice is described as being “among the very best nationally”, consideration should be given to how this is evidenced and benchmarked to ensure consistency between inspections and local authorities.

Strong standard

The NNPCF support the emphasis on evidence-informed decision-making and practice contributing to lasting improvement in the experiences of children and families.

Evidence of a strong standard should include the experiences of children, young people and families themselves. Inspectors should be able to see that leaders understand how services are experienced in

practice and use feedback, complaints, engagement and other evidence to identify and address emerging or recurring issues.

For children and young people with SEND, inspectors should consider whether strong practice is evident across children’s social care and its interfaces with education, health and wider SEND services. Families frequently experience services across organisational boundaries, and strong practice within one part of the system should not obscure difficulties caused by poor coordination between services.

Direct engagement with children and families should be complemented by collective strategic evidence from PCFs. Their knowledge of local services and families’ experiences can help inspectors identify patterns and test whether leaders’ understanding of service quality reflects families’ experiences.

Expected standard

The NNPCF agree that meeting legal requirements, statutory guidance, government standards and the Children’s Social Care National Framework should form the foundation of the expected standard.

However, compliance alone should not be sufficient evidence that children and families are experiencing services as intended. Inspectors should consider both whether appropriate processes and systems are in place and whether these result in appropriate experiences and outcomes for children and families.

This is particularly important for children and young people with SEND, where there can be a difference between the processes described by leaders and families’ experiences of accessing, navigating and receiving support.

Direct engagement with children, young people and families, alongside collective strategic evidence from PCFs, can help inspectors test whether leaders’ understanding and self-evaluation accurately reflect how services are experienced locally and identify recurring themes or gaps that may not be evident from individual cases.

Needs attention

The NNPCF welcome the recognition that services can require improvement even where failures do not reach the threshold of serious or widespread harm.

We suggest careful consideration of the wording that “the inconsistent quality of service delivery adversely affects the experiences of some children and families”. The term “some” could unintentionally minimise significant or persistent problems affecting particular groups of children and families.

For example, an issue may not affect the majority of children using a service but may have a substantial and recurring impact on children and young people with SEND or another identifiable group. Inspectors should therefore consider the scale, persistence and impact of weaknesses, including whether particular groups experience poorer access, support, experiences or outcomes.

Evidence should include direct engagement with children and families alongside wider sources of evidence. Collective evidence from PCFs can be particularly valuable in identifying recurring themes and patterns across families that may not be apparent through individual case sampling alone, and in testing whether leaders recognise and are responding to these issues.

Urgent improvement

The NNPCF agree that serious or systemic failures affecting the safety, welfare or outcomes of children should result in a judgement of urgent improvement.

The description should make clear that systemic failure may be demonstrated not only through individual cases of significant harm, but also through repeated or persistent patterns of failure that cumulatively create significant risks, poor experiences or poor outcomes for particular groups of children.

For children and young people with SEND, inspectors should consider whether repeated failures in areas such as access to appropriate support, multi-agency working, transitions, safeguarding and communication indicate wider systemic weaknesses.

Evidence from children, young people and families should be central to identifying these patterns. This should include direct engagement as well as consideration of complaints and other local intelligence. Collective strategic evidence from PCFs can help inspectors identify recurring issues across families, understand the impact of systemic weaknesses and test whether the local authority’s assessment of its own performance reflects families’ experiences.

Proposal 3: How Ofsted reports

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

The NNPCF supports making inspection findings easier for families to navigate, provided accessibility and nuance are not lost. The most important feature is the proposed explanation of what findings mean for children and families.

Report cards should use plain language, be accessible on mobile devices and to people using assistive technology, and offer an Easy Read or equivalent accessible summary where appropriate. The headline visual presentation should not overshadow the narrative or encourage readers to treat complex services as a simple scorecard.

Ofsted should co-produce the final format with children, young people, parents and carers, including people with different communication and accessibility needs.

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

Data can provide useful context and improve transparency, but it should complement rather than outweigh lived experience and qualitative inspection evidence. National datasets can lag behind current practice and may hide substantial differences between groups.

Where possible, data should be presented with clear definitions, dates, comparator information and explanations of limitations. Ofsted should also explain where inspection evidence from children and families indicates a different or more complex picture than headline data suggests.

We would welcome a short section describing the sources of lived-experience evidence used during the inspection, while protecting confidentiality and avoiding any implication that a survey response rate alone determines how representative the evidence is.

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

In addition to the indicators proposed by Ofsted, the NNPCF suggests considering information that helps families understand access, timeliness, stability and equity. This could include waiting times or timeliness for relevant assessments and support where robust comparable data exists; stability and distance from home;

use of unregistered provision; educational engagement for children receiving social care support; and information about outcomes for disabled children and children with SEND where data quality permits.

We also recommend contextual information about how the local authority gathers and acts on the views of children and families. This should not become a simplistic numerical ‘co-production score’. A concise narrative about the strength, reach and impact of engagement would be more meaningful.

Proposal 4: Children, young people, parents, carers and family engagement during ILACS inspections

The NNPCF welcomes Ofsted’s intention to build a more consistent and inclusive approach. The renewed framework offers an opportunity to move from variable engagement to a clear minimum standard for how lived experience is gathered, understood and used.

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

Children and young people should be offered different ways to participate, recognising that one method will not work for everyone. Options should include accessible surveys, individual or small-group conversations, supported communication, online routes and opportunities to contribute through trusted organisations or advocates.

Engagement should be trauma-informed and proportionate. Children should understand why inspectors want to hear from them, what will happen to the information they share, the limits of confidentiality, and that choosing not to participate will have no adverse consequence.

Ofsted should actively include children who may otherwise be under-represented, including disabled children, children with communication needs, children placed away from home, children receiving support without being in care, and children whose experiences cross education, health and social care. Reasonable adjustments and communication support should be planned rather than left to families to request.

Children and young people should also help Ofsted design and review the engagement methods used within ILACS. Co-production of the inspection toolkit is likely to produce methods that are more accessible, trusted and meaningful.

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

The NNPCF recommends a consistent minimum engagement model for every standard ILACS inspection. This should include clear and accessible notification; more than one route for families to contribute; direct routes to Ofsted that do not rely solely on the local authority; targeted activity to reach groups whose voices are less often heard; and structured engagement with relevant representative organisations.

For disabled children and children and young people with SEND, Ofsted should explicitly include the local PCF as a strategic stakeholder where the scope of inspection is relevant to those families. The area SEND inspection framework provides a useful precedent: inspectors gather evidence from surveys, families and representative groups; meet PCF representatives; and involve PCFs in strategic inspection activity. A proportionate version of this approach should be built into ILACS rather than depending on local practice or individual inspector discretion.

The NNPCF suggests that the ILACS methodology includes: direct notification to the PCF when an inspection begins; a named route for the PCF to provide concise evidence of recurring themes; a structured meeting with inspectors; opportunities to identify both effective practice and areas for improvement; and clarity about how

collective evidence has informed lines of enquiry. Where appropriate, PCFs should also be included in relevant strategic discussions about the local authority’s self-evaluation and improvement priorities.

PCF evidence should always be triangulated. PCFs represent collective parent carer experience and strategic themes; they are not a substitute for direct engagement with families using children’s social care, nor for organisations representing care-experienced children, kinship carers, foster carers or other groups. A strong inspection methodology should deliberately combine these different forms of evidence.

The inspection should also evaluate the local authority’s own approach to co-production. Inspectors should ask whether families are involved from the beginning of service design and improvement; whether the authority reaches beyond the families who are easiest to engage; whether it provides accessible information and support to participate; whether challenge is welcomed; whether families receive feedback; and whether leaders can evidence changes made as a result.

Short inspection timescales can make inclusive engagement difficult. Ofsted should therefore maintain standing relationships with national and local representative networks, provide ready-to-use accessible materials, and make clear in advance what PCFs and other groups can expect during an inspection. This would reduce the burden on volunteer-led or small organisations when an inspection is announced.

Coherence between ILACS and Area SEND inspections

NNPCF would also welcome greater consideration of how evidence and findings are shared and understood across ILACS and Area SEND inspections.

We recognise that the two frameworks have different statutory purposes and scopes and that their inspection outcomes should not be expected automatically to mirror one another. However, there is significant overlap for disabled children and children and young people with SEND, particularly in relation to children’s social care.

The Area SEND framework evaluates arrangements across education, health and social care. It considers, among other things, the identification and assessment of need, access to services and support, social care thresholds and assessments, short breaks, commissioning, transitions and how effectively leaders understand and respond to the experiences of children, young people and their families.

This raises an important question for NNPCF: how can a local authority’s children’s social care services be judged positively through ILACS while the same local area may subsequently be found through an Area SEND inspection to have significant or systemic weaknesses affecting children and young people with SEND, including in aspects of social care?

There may be legitimate reasons for different inspection outcomes because the frameworks examine different populations, partnerships and statutory responsibilities. However, where findings appear significantly different, families need to be able to understand why.

We therefore recommend greater alignment and sharing of intelligence between the two inspection frameworks. Where an Area SEND inspection identifies significant concerns relating to children’s social care, Ofsted should consider how those findings inform subsequent ILACS activity and ongoing annual engagement. Equally, ILACS evidence concerning disabled children and children with SEND should routinely inform Area SEND inspection intelligence.

This is particularly important because children and families do not experience these systems as separate inspection frameworks. A disabled child may simultaneously be receiving support through education, health

and children’s social care. Families are unlikely to understand how the social care element of their experience can contribute to a significantly concerning SEND inspection outcome while the local authority may hold a strong ILACS judgement.

Greater coherence would not require the two frameworks to reach the same judgement. Rather, it would provide assurance that inspectors are sharing relevant intelligence, exploring apparent inconsistencies and considering the experiences of disabled children and children with SEND sufficiently within ILACS.

PCFs could provide an important bridge between the two frameworks. Their involvement in both Area SEND and relevant ILACS inspection activity would allow inspectors to hear consistent, longitudinal evidence about families’ experiences across education, health and social care and could help identify where apparently strong strategic or operational arrangements are not translating into positive experiences for children and families.

Proposal 5: ILACS inspection scheduling

What do you think about the proposals for ILACS scheduling?

The NNPCF understands the rationale for establishing a common baseline through a standard inspection and for coordinating inspection activity with area SEND inspections. Coordination should be used to reduce unnecessary duplication while preserving the distinct purposes of each framework.

A four-year cycle increases the importance of intelligence gathered between standard inspections. Ofsted should ensure that evidence from children, families and representative groups can inform annual engagement, focused visits and risk assessment between inspections, rather than family voice being concentrated only around a periodic standard inspection.

What do you think about the idea of assurance visits for an evaluation area graded ‘needs attention’?

Assurance visits could provide a useful opportunity to recognise improvement sooner. Where the area for attention directly affects children and families, the assurance visit should include proportionate lived-experience evidence.

If the issue concerns disabled children or children with SEND, the local PCF should be engaged where relevant, particularly where it has been involved in improvement activity. Inspectors should consider both whether action has been taken and whether families are experiencing the intended improvement.

What effect could the proposed ILACS changes have on workload and wellbeing?

More structured engagement could create additional work for Ofsted, local authorities and representative organisations, but good design can minimise this. Ofsted should avoid requiring bespoke evidence produced solely for inspection and should use evidence generated through routine co-production, quality assurance and engagement.

PCFs are often small organisations with limited capacity. Requests should therefore be proportionate, clear and made as early as the inspection model permits. Standard templates, concise evidence requests and predictable engagement arrangements would help PCFs contribute effectively without creating unnecessary burden.

What steps could reduce or manage unintended consequences?

Ofsted should pilot the engagement model with a diverse range of local authorities, children, families and representative organisations, including PCFs, and evaluate who participated, who was missing and whether evidence influenced inspection activity.

There should be safeguards against local authorities selecting only positive family voices or controlling access to representative groups. Families and representative organisations need a direct route to Ofsted. Equally, inspectors should avoid assuming that the loudest or most numerous responses are automatically representative.

Ofsted should monitor whether the new grading and report-card arrangements create unintended incentives to focus on measurable indicators at the expense of relationships, co-production and outcomes that are harder to quantify.

How may the proposed changes impact Ofsted’s public sector equality duty?

A stronger and more inclusive approach to lived-experience engagement has the potential to improve Ofsted’s understanding of differential experiences and barriers faced by children and families with protected characteristics.

To realise this benefit, engagement methods must be accessible by design. Ofsted should monitor participation across different groups, make reasonable adjustments, provide alternative formats and communication routes, and actively seek evidence from people who may face barriers to conventional consultation methods. Disabled children and parent carers should be explicitly considered in the design and evaluation of the new approach.

Data should be disaggregated where lawful, meaningful and statistically robust, while protecting confidentiality. Qualitative evidence will remain essential where small numbers make publication or comparison unsafe or misleading.

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

The NNPCF encourages Ofsted to make co-production a defining feature of both the renewed ILACS framework and the process used to develop it.

Before implementation in spring 2027, we recommend that Ofsted works with children, young people, parent carers, PCFs and other representative organisations to co-produce the detailed toolkits and engagement expectations; pilots them in different local contexts; and publishes a clear explanation of the minimum engagement families and representative groups can expect during an ILACS inspection.

There is a valuable opportunity to align principles across ILACS and area SEND inspection. Families whose children have SEND frequently experience education, health and social care as one interconnected system, even where inspection frameworks divide those services differently. Greater consistency in how Ofsted listens to families, uses collective evidence and tests the quality of local co-production would strengthen both accountability and improvement.

The NNPCF would welcome continued involvement in developing and testing the detailed approach, particularly the mechanisms for PCF participation and the evaluation of co-production within local authority children’s services.

Suggested minimum model for PCF involvement in relevant ILACS activity

Stage	Suggested PCF involvement	Purpose
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Notification	Ofsted directly notifies the PCF when relevant ILACS inspection activity begins.	Ensures an independent route to the forum and reduces reliance on local authority gatekeeping.
Early evidence	PCF can submit a short, structured summary of recurring themes, strengths and concerns.	Helps inspectors identify potential lines of enquiry without creating a large evidence burden.
Inspector meeting	A structured conversation with PCF representatives, separate from local authority leaders.	Allows collective parent carer experience and system-wide themes to be explored.
Strategic scrutiny	Where SEND-related social care is in scope, PCF evidence informs scrutiny of leadership, commissioning, multi-agency working and co-production.	Tests whether leaders understand and act on family experience.
Triangulation	PCF evidence is considered alongside direct family evidence, children and young people’s views, case sampling, data and other representative groups.	Avoids treating any single source as representative of all families.
Feedback and learning	Ofsted explains the role of lived-experience evidence in the inspection process and periodically reviews the engagement model with PCFs and families.	Builds transparency, trust and continuous improvement.

Evidence and context informing this response

This draft has been prepared against Ofsted’s July 2026 consultation proposals. Ofsted proposes to make engagement with children, young people, parents, carers and families a cross-cutting element of ILACS and to develop a more consistent and inclusive approach to lived-experience engagement.

The recommendations on PCF involvement also draw on the established area SEND inspection approach, under which inspectors gather evidence directly from families, meet parent carer forum representatives and include PCFs in specified strategic inspection activity. The NNPCF considers this a useful precedent for a proportionate ILACS model where disabled children and children and young people with SEND are within scope.

The NNPCF welcomes Ofsted’s commitment to put children’s and families’ voices at the heart of inspection. The strongest version of the renewed ILACS framework will go beyond seeking views during inspection and will test whether co-production is embedded in the way local authorities understand need, make decisions, commission support and improve services.

For disabled children and children and young people with SEND, PCFs can make a distinctive contribution by bringing collective, strategic parent carer evidence into inspection. With clear expectations, appropriate

triangulation and direct engagement with individual families, this can help Ofsted build a richer and more accurate picture of how children’s social care is experienced in practice.

Improving the way Ofsted inspects Children's Social Care

Proposal 1: The content of our inspection framework

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

NNPCF supports the proposed ambition for SCCIF inspections, particularly the focus on what matters most to children and families and on understanding children’s experiences rather than relying predominantly on processes or compliance.

We believe the ambition should explicitly recognise children and young people with SEND, including those with complex and multiple needs. Inspection should consider whether providers understand and respond effectively to children’s individual communication, sensory, health, education and support needs, and whether reasonable adjustments are made to enable children to participate meaningfully in decisions about their lives.

The experiences and views of children and families should be an important source of inspection evidence. Inspectors should use approaches that enable children with different communication needs to express their views and should recognise that some children may require trusted adults, alternative communication methods or additional time to participate.

Parents and carers can also provide important evidence about children's experiences, particularly where children have complex needs or communication differences. This should complement, rather than replace, children's own voices and experiences.

Inspection should consider not only the quality of care within an individual provision but also how effectively providers work with families, local authorities, health, education and other partners to support continuity, stability and positive outcomes for children.

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

SCCIF inspections should recognise that caring well for children with the most complex lives requires appropriately skilled, supported and stable staff, alongside care that is genuinely personalised to the individual child.

Inspectors should consider whether providers understand each child's needs, strengths, communication preferences and aspirations and whether these are reflected in their day-to-day care. This should include appropriate consideration of SEND, neurodivergence, disability, trauma and health needs without assuming that behaviour associated with a child's needs is itself evidence that a placement is unsuitable.

Inspection should also consider whether staff have access to appropriate training, specialist advice and ongoing support, and whether providers work effectively with education, health, social care and families.

It is important that the inspection framework does not unintentionally discourage providers from supporting children with more complex needs. Providers should be held accountable for the quality and suitability of care they provide, while inspection should recognise the complexity of children's needs and the wider system in which providers operate.

Children with complex needs should not experience repeated placement breakdowns or be moved further away from their families and communities because appropriate support has not been commissioned or made available. Inspection findings should therefore help identify wider patterns and systemic barriers as well as the practice of individual providers.

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

SCCIF inspections should consider how effectively providers and local authorities work together to ensure that placements are based on children's individual needs rather than simply on the availability of provision.

For children and young people with SEND, the “right place” should mean more than having a placement available. It should include access to appropriate education, health and therapeutic support; the ability to maintain important relationships with family, friends and trusted adults; consideration of communication and sensory needs; and opportunities to remain connected to the child's community wherever this is in their best interests.

Inspection should explore whether providers have accepted placements they can appropriately meet, whether local authorities have provided accurate and sufficient information about children's needs, and whether the necessary resources and specialist support are available to sustain placements.

There should also be scrutiny of children being placed significant distances from their home communities and of repeated placement changes, including the reasons these occur and their impact on children.

SCCIF and ILACS should complement each other so that inspection can identify where difficulties arise from provider practice, local authority commissioning and sufficiency, or wider system issues. This would help avoid responsibility being considered in isolation when children and families experience the consequences of the whole system.

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

Inspection should place greater emphasis on children's lived experiences and the things they identify as important to them, including feeling safe, being listened to, having trusted and enduring relationships, receiving appropriate education and health support, maintaining relationships with family and friends, and having stability and a sense of belonging.

For children with SEND, inspectors should use inclusive and accessible approaches to engagement. A child's ability to communicate verbally should never determine the extent to which their experiences are understood during inspection.

Inspection should also consider the experiences of children who may be less visible within standard inspection evidence, including children with complex disabilities, communication differences or neurodivergence and children living a significant distance from their home area.

Parents and carers can provide valuable additional evidence, particularly where they have long-term knowledge of a child's needs, communication and experiences. Inspectors should consider this evidence alongside the child's views and other sources to build a fuller picture of their experience.

We would also welcome greater consideration of transitions and what happens when children move between placements, services or into adulthood. For children with SEND in particular, poorly coordinated transitions can have a significant and lasting impact on their wellbeing, relationships and outcomes.

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

NNPCF strongly supports greater inspection focus on enduring relationships. Stable, trusted relationships can be particularly important for children in care and children with SEND, and we welcome recognition that maintaining and developing these relationships should be a core part of good care.

The evaluation area should consider the relationships that are important to the individual child rather than applying a predetermined view of which relationships should be maintained. This may include parents, siblings, wider family, foster carers, previous carers, friends, professionals and other trusted adults.

Inspectors should consider how providers actively support children to maintain these relationships where they are safe and in the child's interests, including when children are placed at a distance from their home community.

For children with SEND, particular consideration should be given to communication needs and to children who may demonstrate relationships or attachment differently. Inspectors should avoid making assumptions about the importance or quality of a relationship based solely on conventional measures of communication or contact.

There should also be recognition that providers cannot maintain enduring relationships in isolation. Local authority decisions about placements, commissioning, contact, transport and funding can significantly affect whether relationships can be sustained. Inspection should therefore distinguish clearly between factors within a provider's control and wider systemic barriers.

The Department for Education has described enduring relationships as a central part of its direction for children's social care, including relationships with family, friends and other trusted adults, and intends this to become a stronger feature of accountability and inspection.

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

NNPCF supports greater scrutiny of the recruitment, assessment and support of foster carers, particularly where this helps ensure that children are matched with carers who have the skills, knowledge and support necessary to meet their individual needs.

For children with SEND and complex needs, inspection should consider whether agencies recruit and develop foster carers with the skills and confidence to support a diverse range of needs and whether carers receive appropriate training, specialist advice, practical support and opportunities for continued learning.

Assessment should consider carers' ability and willingness to understand and respond to children's individual needs, including neurodivergence, disability, communication differences, sensory needs and trauma, while avoiding assumptions that SEND or complexity necessarily requires a specialist placement.

The evaluation area should extend beyond recruitment numbers and initial assessment to consider foster carer retention and the quality and timeliness of ongoing support. This should include what happens when a child's needs change or difficulties emerge and whether carers can access help early enough to support placement stability.

Inspectors should also consider how effectively independent fostering agencies work with local authorities, education and health services to ensure foster carers receive the information and external support they need.

Where foster carers report that a placement is under pressure because appropriate education, health or local authority support is unavailable, inspection should distinguish between the quality of support provided by the fostering agency and wider systemic barriers. This would provide a more accurate understanding of the factors affecting placement stability and children's experiences.

Proposal 2: How we grade

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

NNPCF supports the proposal to remove the single ‘overall experiences and progress’ judgement, provided that children’s experiences and progress remain central to every relevant evaluation area and are clearly visible within inspection reports.

Separate grades and narrative for individual evaluation areas have the potential to provide children, families, commissioners and providers with a more transparent and nuanced picture of the quality of provision. A single overall judgement can mask significant differences between areas of practice, including where a provider performs well in some areas but where children experience difficulties in others.

However, removing the overall judgement must not inadvertently reduce the prominence given to children’s lived experiences. Inspectors should consistently consider what practice means for children in their day-to-day lives, including whether they feel safe, listened to and supported; whether their individual needs are understood and met; whether they have stable and enduring relationships; and whether they are able to access appropriate education, health and wider support.

For children with SEND, inspection should consider whether their communication, sensory, health, education and support needs are understood and whether reasonable adjustments enable them to participate fully in their care and decisions affecting them.

Children’s views should be complemented by evidence from parents and carers where appropriate, particularly for children with complex needs or communication differences. The move away from an overall judgement should therefore strengthen, rather than dilute, the visibility of children’s and families’ experiences throughout the inspection framework.

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

NNPCF supports the principle of a ‘secure fit’ methodology where this enables inspectors to reach rounded, evidence-based judgements rather than treating inspection criteria as a checklist.

The methodology should allow inspectors to consider the individual context of children and the complexity of their needs while maintaining clear and consistent expectations of providers.

It will be important that inspectors triangulate evidence from a range of sources, including children and young people, parents and carers where appropriate, staff, records, observations and partner agencies. No single source of evidence should determine a judgement where the wider evidence presents a different picture.

For children with SEND and those with complex needs, inspectors should understand how disability, neurodivergence, communication differences and other individual needs may affect children’s experiences and outcomes. Providers should be expected to make appropriate adjustments and provide high-quality individualised care, but should not be disadvantaged simply because they support children whose needs and circumstances are particularly complex.

Clear guidance and inspector training will be essential to ensure that ‘secure fit’ is applied consistently across different inspectors, providers and types of provision. Inspection reports should also explain clearly the

evidence underpinning each grade so that children, families and providers can understand why the judgement has been reached and what, where applicable, needs to improve.

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

NNPCF supports the principle of a five-point scale if it provides greater transparency and a more nuanced understanding of the quality of provision than the current grading structure.

The additional differentiation could help children, families, commissioners and providers understand both where practice is strong and where improvement is required without those differences being obscured within a broader overall judgement.

However, the distinctions between each grade must be clear, consistently understood and supported by robust evidence. Families should be able to understand what each grade means in practice and, importantly, what it means for children's experiences and outcomes.

The framework should also ensure that positive performance in some areas cannot obscure significant weaknesses affecting particular groups of children. This is particularly important for children with SEND and those with complex needs, whose experiences may differ significantly from the wider population within a provision.

We would therefore expect children's lived experiences, including those of children with SEND and complex needs, to be clearly reflected in the evidence underpinning each grade.

Exceptional

NNPCF supports a grade that recognises genuinely exceptional and sustained practice. However, an exceptional judgement should require evidence that high-quality practice makes a significant and lasting positive difference to children's lives and is embedded consistently across the provision.

Inspectors should consider whether exceptional experiences and outcomes extend across the range of children supported by the provider, including children with SEND and those with the most complex needs. Examples of particularly successful individual practice should not in themselves be sufficient to demonstrate that practice is exceptional overall.

Evidence should include children's own experiences, using accessible and appropriate methods of engagement, alongside evidence from parents and carers where appropriate. For children with complex communication needs, inspectors should ensure that their experiences are not less visible simply because conventional methods of seeking children's views are unsuitable.

Exceptional practice should also demonstrate that providers learn from children and families and use their experiences to continually develop and improve provision.

Where practice is described as being among the very best nationally, there should be clarity about how this is evidenced and benchmarked to support consistency across different providers and types of provision.

Strong standard

NNPCF supports a grade recognising practice that consistently exceeds the expected standard and contributes to sustained positive experiences and outcomes for children.

Evidence of a strong standard should include children's lived experiences and demonstrate that providers understand and respond effectively to children's individual needs, including SEND, disability, neurodivergence and communication differences.

Inspectors should consider whether children experience stable, personalised care; have meaningful involvement in decisions; are supported to maintain important relationships; and receive appropriate education, health and wider support.

A strong standard should also demonstrate that providers listen and respond to children and families, learn from feedback and complaints, and work effectively with local authorities and other agencies.

Where difficulties arise because appropriate external services or support have not been provided, inspectors should distinguish between factors within the provider's control and wider systemic barriers, while considering how effectively the provider has advocated for the child's needs.

Expected standard

NNPCF agrees that meeting statutory requirements, regulations and relevant guidance should form the foundation of the expected standard. However, compliance with processes alone should not demonstrate that children are receiving the quality of care intended by those requirements.

Inspection should consider whether systems and processes translate into appropriate day-to-day experiences and outcomes for children.

For children with SEND, inspectors should consider whether individual needs are understood and met, reasonable adjustments are made, communication is accessible and children are supported to participate meaningfully in decisions about their lives.

Evidence should include direct engagement with children, alongside parents and carers where appropriate, to help inspectors test whether the provider's understanding of its practice reflects children's actual experiences.

An expected standard should therefore represent effective practice experienced consistently by children, rather than simply evidence that the required policies, processes and documentation are in place.

Needs attention

NNPCF supports a grade that identifies weaknesses requiring improvement before they become serious or systemic failures.

Inspectors should consider the scale, persistence and impact of weaknesses rather than relying solely on the number of children affected. A problem affecting a smaller group of children may nevertheless represent a significant concern if those children share particular needs or characteristics.

This is especially important for children with SEND and those with complex needs. If these children consistently experience poorer access to appropriate support, less stability, communication barriers or poorer experiences than other children within the provision, this should be visible within inspection findings.

Evidence from children and families can help identify recurring themes that may not be apparent from individual case sampling or provider records.

The description should also distinguish between weaknesses within the provider's control and difficulties arising from wider system issues, while considering whether the provider has taken appropriate action to challenge barriers and advocate for children's needs.

Urgent improvement

NNPCF agrees that serious or systemic failures affecting children's safety, welfare, experiences or outcomes should result in an urgent improvement judgement.

Systemic failure should not be understood only as a series of individual serious incidents. Repeated or persistent weaknesses may cumulatively create significant risks or poor experiences, particularly for specific groups of children.

For children with SEND and those with complex needs, inspectors should consider whether repeated failures to understand or meet communication, health, education, sensory or support needs indicate wider systemic weaknesses within the provision.

Children's experiences should be central to identifying these concerns, using accessible engagement methods alongside evidence from parents and carers where appropriate and information from other professionals and agencies.

Where serious concerns involve failures by more than one organisation, inspection should clearly identify the provider's responsibilities while also recognising relevant local authority commissioning, health, education or other systemic factors. This will help ensure that accountability is appropriately attributed and that action addresses the underlying causes of poor experiences for children.

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

NNPCF supports the principle of introducing report cards for SCCIF inspections where these provide children, families and other stakeholders with a clearer and more accessible understanding of the quality of provision, including both strengths and areas requiring improvement.

Report cards have the potential to provide greater transparency than a single overall judgement, particularly where different aspects of a provider's practice vary in quality. However, the grades should always be accompanied by sufficient narrative to explain what inspectors found and, importantly, what this means for children.

Report cards should be accessible to children, young people and families and written in clear language. Consideration should also be given to accessible and alternative formats for children and young people with SEND, including those with communication differences or learning disabilities.

It will be important that report cards do not become primarily a visual presentation of grades. Children's lived experiences should remain central, including whether they feel safe and listened to, have stable and enduring relationships, receive support appropriate to their individual needs and are able to access education, health and other services.

Where inspection identifies differences in the experiences of particular groups, including children with SEND and those with complex needs, these should be visible within the report card rather than being obscured by the overall picture for the provision.

Report cards should enable families to understand not only how a provider has been graded, but the evidence and context behind those judgements and what action is required where improvements are needed.

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

NNPCF supports including relevant data and information within SCCIF report cards where this helps children, families, commissioners and other stakeholders understand the context in which a provider operates and provides greater transparency about children's experiences.

However, data should be used carefully and always presented alongside appropriate context and qualitative evidence. Numbers alone may not explain why particular patterns are occurring or adequately represent the experiences of children, particularly within small or highly specialist provisions.

Data should also be capable of identifying differences between groups of children where appropriate. Aggregate information can mask significant differences in the experiences of children with SEND, disabled children or those with particularly complex needs.

There is also a risk that some measures could create unintended incentives. For example, data relating to placement stability or outcomes should not inadvertently disadvantage providers supporting children with the most complex needs or encourage providers to become more risk-averse in the children they are willing to support.

Inspectors should therefore triangulate quantitative data with children's experiences, information from parents and carers where appropriate, provider evidence and information from relevant partner agencies.

Where data is included, report cards should explain what it shows, its limitations and relevant contextual factors so that families and the wider public are not expected to interpret complex information without sufficient explanation.

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

NNPCF believes the most meaningful information is that which helps children, families and commissioners understand who the provider supports, children's experiences and outcomes, and the stability and quality of the care being provided.

Depending on the type of provision, useful information could include:

- the number and age range of children supported and the type of provision
- information about the needs of children supported, including the proportion with SEND, disabilities and complex or multiple needs, where this can be presented safely and meaningfully
- placement stability, including the number and reasons for unplanned placement endings
- the extent to which children are placed away from their home area and, where appropriate, the distance from their home community
- children's access to suitable education, including whether children are receiving the education specified for them and whether there are significant periods without appropriate education
- access to health, therapeutic and specialist support where this is relevant to children's needs
- children's experiences and views of their care, gathered through accessible and inclusive approaches
- the extent to which children are supported to maintain relationships with family, siblings, friends and other important people
- staff stability, turnover and use of agency staff where this has a direct bearing on children's continuity of care and relationships
- for fostering provision, information about foster carer recruitment, retention, vacancies, support and placement stability
- complaints, safeguarding concerns and significant incidents, with sufficient context to enable these to be understood appropriately

- progress against areas identified for improvement at previous inspections.

For children with SEND and complex needs, it would also be valuable to understand whether placements are meeting the needs for which they were commissioned and whether children have access to the education, health and specialist support identified as necessary for them.

Data should not be presented in isolation or used to make simplistic comparisons between providers supporting very different groups of children. Relevant contextual information should accompany it, and inspection narrative should explain significant patterns and what these mean for children's experiences.

Where difficulties result from wider system issues, such as a lack of suitable education, health provision or local authority commissioning, the report should distinguish this from matters within the provider's control while also explaining how effectively the provider has advocated for the child and worked with partners to address the issue.

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

NNPCF strongly supports a more consistent and inclusive approach to engaging children and young people during SCCIF inspections. Children's experiences should be central to understanding the quality of their care, but engagement must be flexible and accessible enough to include children with a wide range of needs and communication preferences.

Inspectors should use a range of approaches rather than relying predominantly on interviews, conversations or written surveys. For children and young people with SEND, including those who are non-speaking or have learning disabilities, communication differences or complex needs, this may include communication aids, visual approaches, observation, advocates or support from a trusted person who understands how the child communicates.

Inspectors should establish in advance how individual children communicate and what adjustments they may require to participate. Children should be offered choice about whether, how, when and where they engage with inspectors, and should understand why inspectors are there, how their information will be used and the limits of confidentiality. They should not feel under pressure to participate.

Where appropriate, inspectors should spend time observing children's day-to-day experiences and interactions rather than relying solely on planned conversations. For some children, how they experience relationships, choice, communication, routines and support may provide important evidence that cannot easily be captured through direct questioning.

Inspectors should also be alert to children whose views may be less visible, including children with complex disabilities, children placed a long distance from home and children who may communicate distress or dissatisfaction through changes in behaviour rather than verbally.

Engagement should not be limited to asking children whether they are happy with their care. It should explore what matters to them, including whether they feel safe and listened to; have choice and control appropriate to their age and needs; have trusted and enduring relationships; can maintain important relationships with family and friends; and receive the education, health and other support they need.

Where parents, carers or trusted adults provide information about a child's communication or experiences, this should complement rather than replace direct efforts to understand the child's own views and lived experience.

Inspector training will be essential to ensure inspectors have the confidence and skills to engage meaningfully with children with different communication needs and understand that meaningful participation will look different for different children.

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

NNPCF strongly supports more consistent engagement with parents, carers and families during SCCIF inspections. Families can provide important evidence about children's experiences, particularly where they have long-standing knowledge of a child's needs, communication, history and what is important to them.

Parents and carers of children with SEND can provide valuable insight into whether a provider understands and meets their child's needs, whether reasonable adjustments are being made, the quality of communication with families, placement stability, access to education and health support, and whether important relationships are being maintained.

Ofsted should provide different and accessible ways for families to contribute, including telephone or online conversations and written or digital feedback, rather than relying on a single engagement method. Families should be given clear information about why Ofsted is seeking their views, how their evidence will be used and the limits of confidentiality.

Inspectors should actively seek a range of family experiences rather than relying only on families identified by the provider or those who are easiest to contact. Consideration should be given to how families who are less engaged with the provider, whose relationships with services have become difficult, or whose child has recently left the provision can contribute. Their experiences may provide important evidence about areas of practice that would otherwise be less visible.

Family feedback should be triangulated with other inspection evidence and should not be dismissed simply because an individual family's experience differs from the provider's account. Equally, individual experiences should not automatically be treated as representative of all families. Inspectors should look for patterns, themes and differences in experience and explore the reasons for them.

For children placed away from their home area, engagement with families can be particularly important in understanding the impact of distance on family relationships, communication, involvement in decisions and the child's connection to their home community.

Inspection should also consider the quality of the provider's own ongoing engagement with families, including whether families are listened to, involved appropriately in decisions about their child and able to raise concerns without fear that doing so will negatively affect their child's care.

Where difficulties raised by families relate to education, health, local authority commissioning or other services outside the provider's direct control, inspectors should distinguish these wider systemic barriers from provider practice while considering how effectively the provider has communicated concerns, advocated for the child and worked with partners to resolve them.

Meaningful family engagement should therefore be viewed as an important source of inspection evidence alongside, and complementary to, direct engagement with children and young people.

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

NNPCF recognises that the proposed changes may initially increase workload for leaders, practitioners and inspectors as they become familiar with new evaluation areas, the five-point grading scale, secure-fit methodology, report cards and strengthened expectations around engagement with children and families.

There is a particular risk that providers respond by creating additional documentation or evidence specifically for inspection. Ofsted should be clear that inspection should primarily draw on evidence that providers already use to understand the quality and impact of their work, rather than requiring new inspection-specific processes.

The stronger focus on engagement with children, young people and families is welcomed, but sufficient time and capacity will be needed to ensure this is meaningful. Engaging children with SEND and complex communication needs appropriately may require additional preparation, reasonable adjustments and different methods of communication. This should be recognised within inspection planning and inspector workload.

The changes could also have positive effects if they result in a more proportionate and nuanced inspection process. Removing a single overall judgement and recognising different areas of strength and development may reduce some of the pressure associated with inspection, provided the new grading system does not simply replace one high-stakes judgement with multiple high-stakes judgements.

Clear guidance, effective training and consistency between inspectors will be important. Leaders and practitioners should understand what is expected without feeling that they need to interpret or anticipate individual inspectors' expectations.

Implementation should be monitored, including feedback from children, families, providers and inspectors, to identify any unintended impact on workload and wellbeing and enable Ofsted to respond quickly where concerns emerge.

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

NNPCF believes Ofsted should actively monitor the implementation of the new SCCIF framework and be prepared to refine it where unintended consequences emerge.

In particular, we would recommend:

- ensuring that providers are not expected to create additional documentation specifically for inspection where existing evidence is sufficient
- providing clear guidance, examples and training to support consistent interpretation of the five grades and secure-fit methodology
- monitoring whether the grading framework creates unintended incentives for providers to become more risk-averse about supporting children with SEND or those with the most complex needs
- ensuring that data and report cards are accompanied by appropriate context and do not encourage simplistic comparisons between providers supporting very different populations
- ensuring that increased engagement with children and families is properly resourced and uses inclusive and accessible methods rather than becoming a standardised consultation exercise
- monitoring whether children with SEND, disabled children, children with communication differences and those with complex needs are adequately represented within inspection evidence

- distinguishing clearly between provider practice and difficulties arising from wider system pressures, including local authority sufficiency and commissioning and access to education, health and specialist services
- ensuring that complaints, incidents or placement breakdowns are considered in context and do not inadvertently discourage providers from supporting children whose needs are more complex
- seeking regular feedback from children, young people, families and providers about how the framework is operating in practice.

Ofsted should also review the impact of the changes after an appropriate implementation period, with particular consideration of whether the framework is improving inspectors' understanding of children's lived experiences and whether any groups of children are becoming less visible within inspection evidence.

The test of the new framework should ultimately be whether it provides a more accurate understanding of the quality of children's care and supports improvement without creating behaviours that inadvertently reduce choice or access to appropriate provision for children with the most complex needs.

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

NNPCF believes the proposed SCCIF changes have the potential to support Ofsted's public sector equality duty, particularly through the increased focus on children's individual experiences and more inclusive engagement with children, young people, parents, carers and families.

However, this will depend on how the proposals are implemented in practice.

Children with SEND and disabled children must be able to participate meaningfully in inspection regardless of their communication method, learning disability, neurodivergence, sensory needs or other individual circumstances. A consistent approach to engagement should therefore mean consistent access to participation, rather than requiring every child to engage in the same way.

Reasonable adjustments and accessible communication should be embedded throughout inspection. Inspectors should have appropriate training and access to the skills and resources necessary to understand the experiences of children who communicate differently, including children who are non-speaking.

The proposed greater use of data also creates both opportunities and risks. Where possible and appropriate, data should enable inspectors to identify differences in experiences and outcomes between groups of children. Aggregate data can otherwise conceal inequalities affecting children with SEND, disabled children or other groups with protected characteristics.

There is also a potential unintended equality impact if providers perceive that supporting children with more complex needs increases their inspection risk. Ofsted should monitor whether the new grading methodology influences providers' willingness to accept or continue placements for disabled children, children with SEND or those with complex and multiple needs.

Inspection should recognise complexity without lowering expectations for children. Children with SEND and disabled children should have the same entitlement to safe, stable, high-quality care, meaningful relationships and positive experiences as other children, while inspectors recognise that the support required to achieve this may look different for each child.

NNPCF would welcome ongoing equality impact monitoring following implementation, informed by the experiences of children, young people and families as well as inspection outcomes and provider data.

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

NNPCF broadly welcomes the direction of the proposed SCCIF changes, particularly the stronger focus on children's lived experiences, enduring relationships, inclusive engagement and providing a more nuanced picture of provision.

Across the new framework, we would encourage Ofsted to maintain a strong focus on children with SEND and those with the most complex lives. These children can experience services across social care, education and health simultaneously, and their experiences cannot always be understood by considering an individual provider in isolation.

There should therefore be strong alignment between SCCIF, ILACS and Area SEND inspections. Where evidence identifies recurring difficulties at the interfaces between services, this should contribute to Ofsted's wider understanding of systemic issues and inform relevant inspection activity.

We also encourage Ofsted to ensure that the voices of children who communicate differently or whose experiences are less easily captured through conventional engagement methods remain visible throughout the framework. Parents and carers can provide important additional evidence, particularly where they have long-standing knowledge of a child's communication and needs, while complementing rather than replacing direct efforts to understand the child's own experience.

Inspection should also recognise the distinction between individual provider responsibility and wider systemic barriers. Providers should be accountable for the quality of their practice and for how effectively they advocate for children, while inspection should identify where difficulties relate to local authority commissioning and sufficiency or access to education, health and specialist services.

Finally, we would encourage Ofsted to establish mechanisms for ongoing engagement with children, young people, families and representative organisations following implementation. The impact of these reforms should be evaluated not only by whether the new inspection methodology operates effectively, but by whether it provides a better understanding of children's experiences, identifies inequalities and systemic barriers, and contributes to improved experiences and outcomes for children.