

Speech: Social care monthly commentary: March 2017

Creating an effective front door

In this commentary, I want to focus on what the important ingredients are for an effective front-door service – one that responds quickly and appropriately to children and child protection concerns. I want to dispel the myth that there is a certain ‘model’ that will solve the problems that this part of the children’s social care service faces.

Throughout the country, local authorities are struggling to get the front-door service right. While it is a hugely complex task, there are some basics that always need to be done well. Some authorities that are struggling to get the whole of the front-door service working well have shown good practice in certain areas, which is something I want to recognise in this commentary. We must praise and share good practice where we see it, even where authorities are less than good.

We need to move away from the idea that local authorities need to use a particular front-door model. What works in one place will not work everywhere. There are various names for different models in different places, such as multi-agency safeguarding hub (MASH) or contact and referral service, and they are not always used to describe the same thing. Some of these multi-agency arrangements work well, but providing a good service is about more than adopting a specific model or a name.

Every area will have different challenges around multi-agency working and ensuring that children and their families get the right help at the right time. The best authorities will continue to develop ways of working that best meet these local challenges as they change over time.

There are a variety of ingredients to an effective front-door service that, when applied flexibly, will deliver what children and their families need. We know that each part of the children’s social care system is reliant on the work carried out in other parts of the system. So getting it right at the front door makes a huge difference to children both in the short and long term.

What is the front door?

The ‘front door’ in a social care context is the arrangement that local authorities have in place to respond to an initial contact from a professional or member of the public who is concerned about a child. At the front door, local authorities provide advice and make decisions about how they will act on information about the health, well-being and safety of children.

The front door, therefore, is where professionals gather information and make decisions about which pathways to follow for different contacts and referrals. This may lead to an assessment by children's social care, early help or a response from universal services.

There are many different ways of organising work at the front door. Some local authorities have models run by the corporate call centre, while others have multi-agency hubs. Each can work well. And some have multiple front doors, for example in different locations or to allow for specialist teams.

It is not uncommon for a child to be referred to children's social care during their early childhood. It is estimated that 1 in 5 children will be referred before they start school. This gives a sense of the volume of work that local authorities and professionals at the front door have to manage.

All partners, including schools, health services, the police and others are responsible for providing their own high-quality initial response services. Other agencies need to know what information to share, when and with whom. Everyone involved in children's lives has a responsibility to identify and share concerns.

What are the important ingredients of an effective front-door service?

Advice

Partner agencies such as health services, schools and the police often have a lot of in-depth knowledge about children and families. Advice on making referrals helps them to distil the information needed and to keep thresholds consistent across agencies. Good-quality advice at the front door should also be available to individual members of the public and service users.

In Croydon for example, members of the public, including young people, can access and speak to a duty social worker at any time through the reception at council offices and the emergency duty team after hours. This service is particularly well used by young people who have accommodation issues. Croydon also has an information and advice line for professionals. It allows anyone considering non-urgent referrals to discuss their concerns. This is improving the quality of referrals.

Gathering and analysing information

Leaders must ensure that the information systems that professionals use support them to do their work well. All relevant information about children, families and incidents has to be captured and analysed so that risks are properly understood and the right decisions can be made. Every effort should be made to ensure that collating this evidence is as efficient, quick and as easy as possible to allow staff to focus on their work rather than duplicating paperwork or 'feeding' unhelpful information systems. Leaders must ensure that this work is quality assured to maintain high standards over time.

Sharing information well

There has to be clarity about what information can and should be shared. Each agency and all professionals should have a clear understanding of their roles and responsibilities, both separately and to each other. A significant challenge for local authorities is organising all agencies to share information. Only the most determined leaders can make sure that everyone involved understands how this works, that everyone is confident in sharing the right information and that there is a consistent approach.

Contextualising family strengths and risk

Historical factors about children and families have to be taken into account and fully analysed to understand families' strengths and risks. Inspectors commonly identify this as a weakness in their evaluation of cases. Where possible, staff should take a proactive approach rather than a reactive approach.

They should seek to understand the context in which children are living and the strengths of the family and their protective factors, as well as the risks children might be facing. In one family, an incident may indicate a more significant risk, but in another, evidence of strengths within the family may mean there is less concern.

Any incidents or events must be considered within that context if we are to build resilience in families wherever it is appropriate.

Using early help appropriately

Time and again, we hear that early help is critical. Helping families early prevents smaller risks from escalating, which keeps parents and children together. Families must receive the right help at the right time. The focus should be on an early, co-ordinated response.

But early help has to be purposeful and families must understand what they need to change. This means helping them to build resilience and resources, rather than becoming reliant on services. Good front-door services know what help is available locally and in communities. They can signpost families to where they can get the help and support they need when the threshold for social care involvement has not been met.

It's worth bearing in mind though, that the best front doors are about getting families the right help and support quickly, rather than functioning as a 'gatekeeper' of services.

A culture that places the welfare of the child at the centre

Professionals should try and see through the eyes of a child. They should ask the questions: 'What is the experience of this child? What is daily life like for this child? What is the response that will most meet this child's needs?'

Valuing professional disciplines and expertise

Different agencies and professionals have a variety of expertise. Valuing that range of expertise and difference in perspective and focus, is important and bringing it together leads to better decision-making. This can happen virtually or through co-location.

However, simply sitting in the same room as one another is not enough. Inspectors have found instances of agencies located together, but still missing opportunities to share information and make joint decisions. All agencies, including probation, adult services, health, education and schools must understand their own and each other's roles. The best authorities work hard to ensure that they have a good relationship with their schools.

Making use of specialist knowledge in critical areas of child protection, such as domestic abuse and child sexual exploitation, can help to improve services. Care needs to be taken to root this knowledge in teams so that it is sustainable and helps inform thinking in the longer term rather than being a quick fix for difficult cases.

A responsive out-of-hours service

A good out-of-hours service is run by people who know the work well and are able to respond to a whole range of challenging circumstances. Crucially, this service is responsive and does not just act as a 'waiting area' for the next day.

In Wakefield, for example, out-of-hours social workers provide a wide-ranging service to both new and open cases. This includes welfare visits, follow-up on cases that have come through the duty team and timely completion of child protection enquiries, including strategy discussions.

Despite the service requiring improvement overall, Wakefield's co-location and good communication with the police supports multi-agency information-sharing and decision-making. Staff are timely in their response to children and families' needs out of hours.

Close working with health partners

This needs to be embedded and routine. In Central Bedfordshire, for example, the children's social care service works jointly with the safeguarding nurses at the hospitals, health visitors and school nurses. All GP practices have a linked social worker, and this is assisting communication, decision-making and understanding of each other's roles.

Multi-agency strategy discussions

Despite prioritising, and increasing their investment in, multi-agency working and information sharing, too many local authorities have weaknesses in the way they run strategy discussions. Not all partners are always present and this severely affects the quality of the discussion, the information that is shared and the decisions that are made. Risks around children and their

families can be missed more easily if agencies that work closely with them are not at the discussions.

Managing the work

I can't emphasise enough how important good leadership is in ensuring that children and families get what they need. I discussed this in a commentary on practice leadership last year.

Robust management oversight of how children move through the system is vital. A blockage in one area can produce significant delays in efforts to help and protect them. At the front door, this oversight is absolutely critical.

Management of workflow is similarly important. Applying thresholds consistently is still a challenge. Children need the right help no matter what time the referral comes in, the quality of the referral, which staff are on duty, or the management arrangements.

Good leadership also includes:

- well-supported, confident and knowledgeable managers, who have an overview of the work through monitoring
- good systems for recording and sharing information
- a clear information-sharing policy that is understood by all staff
- performance monitoring, performance management and quality assurance arrangements that support managers in monitoring the work and taking action

Maintaining high-quality work

Quantitative measures are not effective by themselves in measuring the quality of the front door. The story of the front door needs to be told through qualitative measures as well. We know that some quantitative measures, such as low re-referral rates, can give false reassurance. Qualitative data is fundamental to understanding the quantitative information.

Regular 'dip sampling' of cases helps managers to understand the effectiveness of information sharing, information gathering, assessment and joint decision-making. Dip sampling is a valuable learning opportunity for front-door staff. It must account for different factors, such as different staff teams and managers, as well as decision-making on different days.

Local authorities need to make sure that they have enough regularly scrutinised quantitative and qualitative information. This can include themed audits, multi-agency audits and information from dip sampling. Learning identified should be disseminated and where necessary, action should be taken and monitored for impact.

Local authorities must have systems to identify if a particular agency does not understand thresholds or is not providing timely, good-quality referrals and information. Not only can this have an impact on the quality of decision-

making, but poor-quality referrals can seriously hinder processes at the front door. A social worker can potentially deal with a higher number of referrals when they don't have to spend time chasing further information that could have been there from the start.

Taking care of frontline social workers

Although this is last in my list, taking care of our social workers at the front door is so important. As I discussed in my commentary in November 2016, 'the environment in which we work can help or hinder us to do the best job we can do'.

In Cornwall, inspectors found that leaders have created a culture of continual learning, support and challenge for social workers. Historically, these areas had been a real problem for Cornwall. But in recent years, these improvements have enabled social work, and social workers, to flourish. Leaders have ensured that their social workers at the front door have manageable caseloads and are part of a stable, knowledgeable workforce.

Indeed, a challenge for local authorities is workforce planning. How do you balance that mix of experience and a fresh view? If a professional works at the front door continually for a long period of time, they can potentially be desensitised to the seriousness of risks. This can happen due to the volume of cases, speed of decision-making, as a coping mechanism in dealing with distressing information, the responsibility of working at speed and getting it 'right'. This is a challenge that needs to be addressed by all agencies.

One way that this can be addressed is by rotating staff working in the front-door services. There are of course those who thrive well on the nature of the work at the front door. They should, naturally, be supported to remain there to provide stability and continuity of knowledge and understanding of the service.

Keeping hold of your good social workers and building the knowledge, skills and confidence of new social workers is critical. Supporting front-door staff well is integral to a good front-door service. Too often, caseloads are high, which impacts on the quality and timeliness of the work. Looking after your staff and helping them to be skilled and confident in their decision-making is an important part of getting it right for children.

[Press release: Trustees failed to report sex abuse allegation](#)

The Charity Commission has criticised the trustees of the [Grail Trust](#) (the charity) over the handling of an allegation of child abuse in the main organisation it raised funds to support, the Grail Trust India (GTI) as

inadequate.

The allegation involved a person connected with the charity at a children's home in India run by its partner GTI, which has now closed. The charity raised funds for and provided financial support to GTI to run the home and representatives of the charity periodically visited the home.

The Commission carried out an initial investigation after being notified of the allegation in August 2011. This led to a statutory inquiry, which examined how the trustees dealt with the allegation and the charity's procedures and approach to safeguarding.

The Commission does not investigate allegations of abuse but intervenes to ensure that trustees are protecting their charity and its users. The allegation is still being investigated by the appropriate overseas authorities and although the inquiry had been awaiting the outcome of the criminal case, given the time that has passed, the Commission has decided to conclude its own investigation.

The inquiry found that the initial response by the trustees to the allegation was inadequate as they did not report the allegation and were not impartial in considering the allegation, which they publically rejected. The inquiry found this was both inappropriate and risked damaging the charity's reputation. The inquiry also found that the charity's trustees had failed to take reasonable steps to ensure that safeguarding measures undertaken by GTI were adequate.

The inquiry concluded that there had been serious governance failures in the charity and that the trustees were responsible for misconduct and mismanagement due to their mis-handling of the allegation of abuse; their failure to ensure that there were proper safeguarding systems in place at GTI and their failure to fully understand that their safeguarding obligations extended to visitors from the charity to GTI.

As a result the Commission issued the trustees with a formal action plan to ensure the trustees understood their safeguarding responsibilities and put adequate measures in place to manage the risks to the charity's beneficiaries. The Commission is currently monitoring compliance with this action plan, and is satisfied that the trustees are acting on the regulatory advice given.

Michelle Russell, Director of Investigations, Monitoring and Enforcement, said:

This is very concerning. It is another case where trustees do not take abuse allegations seriously nor ensure there are proper safeguarding protections in place to protect children.

Trustees have a duty to act in the best interests of the charity and this includes having adequate safeguarding policies in place and fully implementing them.

Many charities deliver charitable work through other charities and partners both here in the UK and overseas. Where that work and those organisations are involved with children, it's important that the charity ensures the partner is not just capable of delivering that work, but has proper safeguarding measures in place. Trustees should therefore put in place proper monitoring of staff and volunteers and ensure safeguarding policies and procedures are in place at a local level.

Further information for trustees on safeguarding can be found in the Commission's policy on: [Safeguarding children and young people](#).

The [full report](#) is available on GOV.UK.

Ends

PR 23/17

Notes to editors

1. [The Charity Commission](#) is the independent regulator of charities in England and Wales. To find out more about our work, see our [annual report](#).
2. Search for charities on our [online register](#).

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Indeed, a challenge for local authorities is workforce planning. How do you balance that mix of experience and a fresh view? If a professional works at the front door continually for a long period of time, they can potentially be desensitised to the seriousness of risks. This can happen due to the volume of cases, speed of decision-making, as a coping mechanism in dealing with distressing information, the responsibility of working at speed and getting it 'right'. This is a challenge that needs to be addressed by all agencies.

One way that this can be addressed is by rotating staff working in the front-door services. There are of course those who thrive well on the nature of the work at the front door. They should, naturally, be supported to remain there to provide stability and continuity of knowledge and understanding of the service.

Keeping hold of your good social workers and building the knowledge, skills and confidence of new social workers is critical. Supporting front-door staff well is integral to a good front-door service. Too often, caseloads are high, which impacts on the quality and timeliness of the work. Looking after your staff and helping them to be skilled and confident in their decision-making is an important part of getting it right for children.

[Press release: Business Minister Margot James urges FTSE 350 chief executives to improve diversity and inclusion](#)

- FTSE 350 companies asked to drive increased diversity in the workplace
- UK's largest companies urged to take up McGregor-Smith Review recommendations
- Margot James to chair the first meeting of the new Business Diversity and Inclusion Group in the coming months

Business Minister Margot James has written to the chief executives of all FTSE 350 companies urging them to improve diversity and inclusion in the workplace.

In her letter, she called on the UK's largest companies to take up key recommendations from the [Baroness Ruby McGregor-Smith Review](#) into black and ethnic minority progression in the workplace, including:

- publishing a breakdown of their workforce by race and pay
- setting aspirational targets
- nominating a board member to deliver on those targets

Business Minister Margot James said:

It simply makes no business sense for people to be left behind because of their ethnic background and I am asking FTSE 350 companies to play their part in driving the agenda for greater diversity in the workplace.

Genuine and lasting change must come from within the business community and I encourage companies to take forward Baroness McGregor-Smith's recommendations.

Baroness McGregor Smith, who published her independent review last month, said:

I'm delighted to see the government playing its part in calling on the UK's largest businesses to improve diversity and inclusion in the workplace.

FTSE 350 companies must help to bring about change by committing to greater transparency and accountability on this vitally important issue as set out in the recommendations in my review.

In the coming months, Margot James will chair the first meeting of the Business Diversity and Inclusion Group set up following the publication of the McGregor-Smith Review.

The group will bring together business leaders and organisations to coordinate action to remove barriers in the workplace.

The Business Inclusion and Diversity Group, chaired by Margot James, will include:

- Baroness McGregor-Smith
- Sir Philip Hampton and Dame Helen Alexander, who are leading a review aimed at increasing female leadership in FTSE companies
- Sir John Parker, who has concluded a consultation on recommendations to increase BME representation in the boardroom
- the CBI, IoD, Business in the Community, Financial Reporting Council and Equality and Human Rights Commission to participate

[News story: Michael Gibbons, Chair of](#)

the RPC talks robust scrutiny

The Government will shortly report on its plans to make the Better Regulation system more efficient for Whitehall Departments, as it promised in response to the PAC's report of 12 October 2016. Continuous improvement of the regulatory framework is, of course, important – but as the RPC noted in our six-monthly report, efficiency should not be conflated with a reduction in quality-assurance of the policy process, nor with a narrow focus on the Business Impact Target.

Indeed, both the PAC and the NAO expressed very strong support for the work of the RPC, and did not propose any reduction in its independent scrutiny at an early stage. The RPC's discussions with leading business groups and other major stakeholders including the CBI, the BCC, the EEF, the IoD, the FSB, and the TUC, confirm that our existing role is strongly supported – especially at this time, when the major regulatory changes associated with Brexit are being considered and therefore regulation as a priority issue for business and Parliament is moving back up the agenda. We therefore feel it is important to retain a focus on appropriate scrutiny at an early stage.

Because late-stage validation is legally mandated under the SBEE Act, past reviews of the system have tended to focus it more and more tightly on the Business Impact Target (BIT) and the requirements of the Act. It is easy to see the higher-value early-stage scrutiny as an easy target for efficiency savings – to the detriment of the system as a whole. But there are a number of examples where we are told that the scrutiny of the RPC at consultation stage has driven changes in approach as a result of better consideration of the evidence and impacts. That, in our view, is how the system should work, and we would argue strongly for a system where scrutiny is focused at an early stage, rather than on pure validation of BIT figures.

The RPC agrees wholeheartedly with the principle of proportionality – Departmental efforts and our scrutiny should both be focused on the most significant and controversial regulations; but our efforts should be proportionate to the actual impact of the measure rather than the BIT impact. To continue to focus the efforts of Whitehall on the narrow confines of the business impact target (BIT) is to miss the point badly, and under the current framework a validation impact assessment, can – and often does – focus purely on the BIT rather than the true impacts of regulation. In addition, it typically does not consider the feasibility of alternatives to regulation, nor trade-offs between different impacts across multiple options, nor impacts on the smallest businesses. The Small and Micro Business Assessment, carried out at a stage when policy is being formed, is seen as a valuable contribution which support small business. Early scrutiny rather than pro-forma validation after decisions are made is key to ensuring these points are properly explored.

Examples of measures which could be excluded from broad, early, effective scrutiny under a system focused only on the BIT and the requirements of the SBEE Act include:

- measures which have significant societal impacts, but do not have large quantifiable direct impacts on business e.g. Trade Union measures or gender pay gap reporting
- measures with large impacts which net off to a small overall figure such as MoT test regulations
- measures where the impacts are large but unquantifiable e.g counter-terrorism measures; regulations around space and satellite market development; laws around the use of autonomous vehicles.

Exempting such measures from proper scrutiny would also create an incentive for Departments to declare that they cannot assess impacts fully – a move away from the improvements in quality of appraisal we have seen since 2010. We know, from discussions spanning several years with stakeholders, that such exclusions would be seen by them as a clear reduction in transparent and independent scrutiny at this vital time.

Another area where we would urge caution is the quality-assurance of evidence underpinning measures which the Government has chosen to exclude from the BIT. In the past, these have included the National Living Wage, National Minimum Wage, and large measures around systemic financial risk, where the Government is making significant decisions and should do so based on strong evidence. They are also measures where Parliament, businesses, and civil society organisations have had a strong interest in ensuring that the Government presents that evidence.

Whilst the RPC supports continued review of the framework, we will argue for a system where eligibility for light-touch scrutiny ensures that measures which fall into the categories listed above, are novel or contentious, or impact any one group particularly, should remain in scope of full, early quality assurance by the RPC. In addition, we would suggest that the same approach should apply to Non Qualifying Regulatory Provisions which would ensure that measures such as the National Living Wage, National Minimum Wage, and large measures around systemic financial risk would receive an appropriately robust level of scrutiny.

Whilst we agree that Departments' efforts and our scrutiny around post-implementation review should focus on the largest measures, we remain very concerned that many of these reviews, regardless of size of impact, are not, in practice, being carried out. This, along with an improvement in the monitoring and evaluation planning, was something the PAC made clear in their recommendations.

The Government has made significant progress over the past five years on tackling the deregulatory agenda, and as a consequence has won a measure of confidence from the business community and civil society. Now, especially in the context of Brexit, is not the time to jeopardise that trust; we should focus on real quality-assurance of major measures when significant regulatory change is ahead.