

Ofsted
Piccadilly Gate
Store Street
Manchester
M1 2WD

T 0300 123 1231
Textphone 0161 618 8524
enquiries@ofsted.gov.uk
www.ofsted.gov.uk



24 October 2018

Michael Jameson
City of Bradford Metropolitan District Council, 1st Floor, Margaret McMillan Tower,
Princes Way
Bradford
BD1 1NN

APPENDIX 2

Dear Michael Jameson

Final report: ILACS Standard Inspection of Bradford

Thank you for the cooperation of your department during the recent ILACS Standard Inspection of your children's social care services. The inspection team have considered your comments on the draft report and amended the report where appropriate. I attach the final report. A response to your factual accuracy comments on the draft report is appended to this letter.

We will share this pre-publication version of the report with:

- the DfE
- the Care Quality Commission
- Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services.
- Her Majesty's Inspectorate of Probation
- Her Majesty's Inspectorate of Prisons
- Her Majesty's Crown Prosecution Services Inspectorate

If you wish, you may share this report with others under embargo until 29 October 2018 at which time it can be publicly accessed on the Ofsted website.

Please send your action plan responding to this report to ProtectionofChildren@Ofsted.gov.uk by the 04 February 2019.

We would welcome your feedback on your experience of the recent inspection/visit.

You can access a feedback survey here:

<https://ofsted.smartsurvey.co.uk/s/ilacs1718/1000060>

We would be grateful for your feedback by 12 December 2018.

If you have any queries please contact ProtectionOfChildren@ofsted.gov.uk

Yours sincerely

Roxanne Smith
Inspection Support Administrator

Response to your factual accuracy comment on the draft report

Paragraph / section in the report	LA comments	Ofsted action
Page 1		
Para 1	Wrong date and title of JTAI. 21 April 2017. Joint targeted area inspection of the multi-agency response to abuse and neglect (including a deep dive on the response to children living with domestic abuse).	Partially agree. The title of JTAI is not reported in the opening paragraph. Date corrected.
Para 2	'... leaving children being harmed or at risk of being harmed'. The inspection asked us to review cases. We reviewed all these cases and agreed that there was drift and delay in some of these. We re-opened 5 cases from early help for a further assessment. None of these indicated that children had been	Agree.

	<p>harmed.</p> <p>We, therefore, believe a more factually accurate representation is to change the sentence to 'potentially leaving children at risk of significant harm' from 'leaving children being harmed or at risk of significant harm'.</p> <p>See page 7, point 25 at the bottom for consistency.</p>	
Page 2		
Point 1	<p>'potentially leaving children at risk of significant harm' from 'leaving children being harmed or at risk of significant harm'.</p> <p>For reasons stated above.</p>	<p>Agree.</p>
Page 3		
Point 3	<p>We request that the wording 'sometimes unlawfully as consent has not been agreed' is changed to 'sometimes not compliant with Working Together'.</p> <p>We have investigated this thoroughly and agree that</p>	<p>Agree.</p> <p>Revised. To follow our house style reworded as 'sometimes not compliant with national guidance'.</p>

	<p>our processes were not appropriate. We have immediately rectified this to ensure we are compliant with Working Together so are already operating a different model on consent to that seen at the time of the inspection.</p> <p>We are particularly concerned that use of the term "unlawful" may be the basis for attempted legal action around historic referrals to our front door against CBMDC which could prove a distraction from the need to improve services at pace.</p> <p>However our City Solicitor has asked for more clarification if the word "unlawful" is to be used noting that the reference to consent does not recognise other situations where it can be established that processing is lawful. The City Solicitor has requested clarification of the specific legislation being referred to so they can more fully research this. The City Solicitor advises that GDPR permits information to be gathered if a lawful basis for processing the data can be established, of which consent is only one. Others include public task (where processing is carried out in the exercise of public functions set out in law or for the performance of a specific task in the public interest as set out in law; no specific statutory power has to be identified). Sensitive personal data can also be</p>	
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	<p>processed if it falls into special category data (where there is a legal obligation and legitimate interest together with substantial public interest). Information is obtained and collated as necessary without consent where safety may be at risk in order to make the judgement in some cases that there is no overriding child protection concern.</p> <p>If it is not possible to remove the word "unlawfully" please can we have clarification of the legislation being referred to beyond Working Together Guidance.</p>	
Page 6		
Point 19	<p>There is no mention about the waiting list for CAMHS services, which is something you provided feedback through the inspection but is not reflected in the report. Is this an omission?</p>	<p>Agree.</p> <p>This is not an omission. The report does not aim to reproduce all of the comments made by inspectors from the two week inspection. However, to assist understanding for wider partners in Bradford, we have added:</p> <p>'However, local child and mental health support is not available in a timely way'.</p>

Point 20	<p>The following sentence is factually inaccurate.</p> <p>'84% of 16 and 17 year old children in care are EET which is much higher than the percentage for all Bradford children at this age which is 66%.'</p> <p>Bradford's EET figures for all young people are currently 93% which are higher than the national and statistical neighbour average, which is very strong performance. 84% of 16 and 17 year olds in care are EET which is also strong performance.</p>	<p>Agree.</p> <p>Revised accordingly.</p> <p>'84% of 16 and 17 year old children in care are EET which is a strong performance and higher than the national average.'</p>
Page 7		
Point 25	<p>Wrong JTAI (see Page 1, Para 1 comment above).</p>	<p>Partially agree.</p> <p>The title of JTAI is not reported in the report.</p> <p>Date corrected.</p>

Page 9		
Point 31	<p>This is factually inaccurate. Although these hubs include the National Troubled Families programme, the bulk of the funding is core funding.</p> <p>We believe a more factually accurate representation is There is also a well located set of early hubs, in the main financed from core funding and the National Troubled Families Programme' from 'There is also a well located set of early hubs, financed from core funding with an additional contribution from the National Troubled Families Programme'.</p>	<p>Agree.</p> <p>Changed to:</p> <p>'There is also a well located set of early hubs, financed from core funding with an additional contribution from the National Troubled Families programme'</p>