

[Consultation on the new Ofsted inspection framework for inspecting semi-independent accommodation](#)

**Q1) To what extent do you agree or disagree with our proposal that inspections will lead to one of 3 outcomes?**

**Strongly agree**

**Agree**

**Neither agree nor disagree**

**Disagree**

**Strongly disagree**

**Don't know**

1. We strongly disagree with the suggested inspection frequency and question whether the outcomes would be easily understood by the general public. We would suggest that all inspections of semi-independent accommodation should follow the established 4-point scale (outstanding, good, requires improvement to be good and inadequate) that is currently used for registered children's homes, schools etc.
  - 1.1. Under the proposals, if an inspection leads to the best inspection outcome, "consistently strong delivery service...", there is a considerable gap before the next inspection three years later. Providers can go from strong to weak during that three year window, leaving children unprotected in their care without oversight from the regulator. The three year window is too long and is likely to reinforce bad practices without any repercussions.
  - 1.2. If an inspection leads to the second 'best' outcome, "*inconsistent quality adversely affects children's experiences and limits their progress...*" We believe that the second inspection should take place within six months, instead of the suggested eighteen months. The statement is negative so we would expect that Ofsted visits in the interim to ensure that the quality is raised and that children living in the environment are well looked after and safe. We think that there is a middle ground between the 1<sup>st</sup> and 2<sup>nd</sup> statements as they range from 'strong delivery' to 'inconsistent quality.'
  - 1.3. Lastly, in a setting that is evaluated as having 'serious or widespread weaknesses,' we want to see urgency from Ofsted in working with the local authority to identify alternatives and where necessary moving children into safe settings. When a setting is evaluated as falling into the second or third outcome category, there should be 1-1 conversations between the children living in semi-independent accommodation and inspectors without exception. This will give children the opportunity to speak about their experiences. Where a child has a special educational need or disability (SEND) Ofsted should work with other specialist agencies to help facilitate communication between the inspector and the child.

- 1.4. Additionally, the consultation says, “*We will determine the frequency of inspections for all services through regular risk assessment*”. However, the information Ofsted possesses may be out of date or inaccurate as the inspection regime relies too heavily on self-reporting mechanisms from the provider. We strongly believe that the frequency of inspections should reflect the inspection frequency of residential homes as per the Children’s Homes Regulations 2015. Moreover, we disagree with provider-level inspection. Every setting where a child lives must be inspected frequently.

**Q2) To what extent do you agree or disagree with our proposal to give 2 working days’ notice of inspection to providers?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- **Strongly disagree**

2.1. We strongly disagree with the proposal to give 2 working days’ notice of inspection to providers of semi-independent accommodation. The reason that registered children’s homes can be inspected at any time by Ofsted is to provide the utmost level of assurance over children’s safety and well-being while they are being cared for by the State. A two-day notice period is at odds with our current system, which prioritises child protection over the provider being able to prepare for inspection.

2.2. Giving providers two working days does not benefit children, nor Ofsted, because the regulator will not get a real picture of the conditions that children are living in. It can only benefit providers who have one registered manager spread across many homes.

2.3. Under current Ofsted guidance for the inspection of residential children’s homes, it states:

“All inspections of children’s homes are unannounced. We ask homes to give the inspector access to premises and records and space for the inspector to work [...]”. (Social Care Common Inspection Framework, Ofsted, 2023)

In current Ofsted guidance for the inspection of schools, it states:

“We will normally notify the school of its inspection between 10.30am and 2 pm on the school day before the start of the inspection. We can inspect any school without notice, if judged appropriate...”. (Inspecting schools: a guide for maintained and academy schools, Ofsted, published 2019 updated 2023)

The notice period which has been suggested by Ofsted gives providers of semi-independent accommodation more time to prepare for inspection than it does for schools. This is despite semi-independent providers being responsible for the safety and welfare of

vulnerable children, the majority of whom have experienced abuse or neglect before entering the care system.

- 2.4. The test of the regulation should be whether it will keep our most vulnerable children safe. It is unrealistic to suggest that children will not be living in semi-independent accommodation post-regulation because the state of the care system is such that semi-independent accommodation is the fastest growing 'market' for children. That market is not growing because it is in a growing number of children's best interest to live in a home without care, but because it is more profitable to run, because it is 'easier' to run (standards being lower than those which exist for residential care homes) and because there is constant demand since there are too few registered children's homes places.
- 2.5. Those children are the same children who risk being overlooked by this inspection regime and left exposed to known risks (such as child criminal exploitation, county lines, and exposure to drug and alcohol misuse) which have been articulated by many, including the former Children's Commissioner for England in her Unregulated report (Longfield, 2020).
- 2.6. On the 28<sup>th</sup> of June, we attended an event with Ofsted, local authorities and semi-independent providers about the new semi-independent accommodation regulations and inspection framework. A member of our staff asked how Ofsted was going to prevent growth in the number of children with complex needs living in semi-independent accommodation, in line with the most recent guidance which states that "where a young person has complex needs and/or requires a greater level of ongoing care and supervision, we do not expect that supported accommodation would be appropriate." (DfE, 2023) Providers we spoke to said that they were not aware that this statement was in the guidance, and in one instance, that all of the children living in their accommodation had a diagnosis of some kind.
- 2.7. What followed was a discussion where it was acknowledged by LAs and providers that there were not enough high-quality homes available for children with complex needs and that right now there are many children with disabilities living in semi-independent accommodation because there is no other place for them. This supports the claim of the former Children's Commissioner for England, Anne Longfield when she said in 2020 that "it is often the children with the most complex needs who are ending up in unregulated accommodation, where they can access the lowest level of support." (Anne Longfield, 2020) A contributory factor, she said, was that "residential providers are often unwilling to take on children with the most complex needs." (Anne Longfield, 2020).
- 2.8. With this in mind, the two-day notice period is dangerous and cannot provide Ofsted with the level of assurance it needs to know children are safe. Additionally, there are specific risks associated with children with disabilities living in semi-independent accommodation, and these risks could be particularly severe for children who are non-verbal or struggle to communicate.

- 2.9. The Hesley report, which examined the way that residential care provision for children with disabilities is commissioned, delivered, and overseen – shed light on how the abuse of 108 children living in Doncaster went under the radar for so long (The Child Safeguarding Practice Review Panel, 2023)

Some of the key findings of that report were:

“Many of the children in scope had profound difficulties with expressive and receptive communication [...] this meant that they would have found it difficult to report the abuse they had experienced, especially given they were not familiar with many people beyond the staff at Hesley’s children’s residential settings. Children’s behaviours meant that visiting professionals were often unable to see them alone, which made the circumstances more problematic.” (The Child Safeguarding Practice Review Panel, 2023)

“Absent or incomplete reporting by the settings obscured serious incidents and concerns, meaning that OFSTED and the local authorities did not have an up-to-date and accurate view about what life was like for the children.” (The Child Safeguarding Practice Review Panel, 2023)

“Intelligence available to OFSTED from complaints, allegations and inspection evidence was not brought together with sufficient rigour to identify risk at the three settings and escalate earlier intervention.” (The Child Safeguarding Practice Review Panel, 2023)

- 2.10. Giving providers two days' notice to prepare for inspection heightens the risk of obfuscation and is too long a period to give Ofsted “an accurate view about what life is like for the children”, especially where there is an additional risk factor. We ask Ofsted to urgently reconsider this proposal.
- 2.11. If the regulatory regime is to go ahead, we believe that providers of semi-independent providers should have to proactively provide details about complaints over a twelve-month period to Ofsted, rather than this action taking place ‘if requested’ (DfE, 2023). Ofsted should prioritise visiting and inspecting semi-independent accommodation where a number of complaints have taken place, not only a sample of providers' accommodation. We believe that this is necessary because of the extremely limited oversight of children living in semi-independent accommodation.

**Q3) To what extent do you agree or disagree that these are the main things that will show us that children in supported accommodation have positive experiences and are making progress?**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

## Don't know

- 3.1. Publishing the features that Ofsted will use in their inspections to establish whether children are having positive experiences is a helpful first step. Nonetheless, the wording of most of the features is vague and simply represents abstract goals. At the inspection level, it will be hard for Ofsted to consistently assess against this framework, and there remains a lack of clarity about the practical steps that can be taken to demonstrate the overarching goals are being met. They should be broken down into smaller key performance indicators to help give providers clarity about what Ofsted wants to see as currently they leave it open to interpretation. In comparison, the Children's Homes Regulations Guide (2015) explains in detail the quality standards providers of registered children's homes must meet.
- 3.2. Specifically, Ofsted can look at the goal for all "accommodation [to be] of good quality and meet children's individual needs". For Ofsted to make a judgement on whether providers are acting in accordance with this, providers need clarity on what "good quality" means. Does it refer to the DfE accommodation standard, or is the word being used in the abstract? Another example would be "plans for children are effective". This requires clarification on what Ofsted considers to be an "effective plan" to avoid inconsistency in judgements.
- 3.3. Some of the statements on the list are too weak, such as "there is strong support for children's education, training and employment." In 2020, our research showed that over a year, more than 3,200 children aged 16 and 17 were not in education, employment or training (NEET) while living in semi-independent accommodation, despite the law requiring children living in the UK to continue education, employment or training until age 18. In 2020, this figure amounted to half of the children known to be living in semi-independent accommodation (Together Trust, 2020). Ofsted should clarify what specific outcomes it will look for in relation to children's education, training or employment while they are living in semi-independent accommodation.
- 3.4. Recent research by the Children's Commissioner shows that many local authorities struggle to report the number of children in their area not receiving an education ([Children's Commissioner, 2023](#)). We need an accurate national picture of the number of children missing out on education and an understanding of why that number is particularly high for children living in semi-independent accommodation ([Children's Commissioner, 2023](#)).
- 3.5. We support the view that "children [should be] involved in decision-making and plans for their futures" and "Children's views are heard and acted upon". One mechanism for driving this forward would be for Ofsted to require providers to report on the number of children living in semi-independent accommodation with access to an independent advocate. Ofsted should also clarify what providers should do when the needs of the children living in semi-independent accommodation change, for example, where they require more support from staff and would prefer to live in a residential care home.

- 3.6. Without national data being recorded on what the best interests of children are across the country (which could then be compared with data on the availability of accommodation), there is little assurance that children are being placed in semi-independent accommodation in accordance with their interests. Ofsted should take an active role during the inspection in speaking with children and contextualising their care plan with the support they are receiving.
- 3.7. Ofsted should also publish an annual report on the state of semi-independent accommodation across the country to explore the implementation of the new regulations and highlight key findings from its inspections. Doing this will give the broader sector, including academics, social workers and local authorities a clearer picture of the current situation and could lead to new policy solutions.
- 3.8. Lastly, every statement on this list must state clearly who has ultimate responsibility for ensuring it is met on behalf of the child. Providers need to know what they are responsible for delivering, and children need to know what they are entitled to. If this is not clarified, accountability will become a ping-pong game between providers and local authorities.

**Q4) To what extent do you agree or disagree that these are the main features of effective help and protection for children in supported accommodation?**

- Strongly agree
  - Agree
  - Neither agree nor disagree
  - **Disagree**
  - Strongly disagree
  - Don't know
- 4.1. We have responded to this question as 'disagree' because although many features of effective help and protection are presented within this list, the nature of semi-independent accommodation and the substandard standard and inspection framework make it infeasible for Ofsted to ensure that children are adequately protected while living in semi-independent accommodation. We will address each of these features below.

*Children feel safe and settled where they live*

- 4.2. On Friday 25<sup>th</sup> of August, we attended a webinar hosted by National Care Form where Ofsted shared a presentation on the new semi-independent accommodation regime and their expectations on providers in registering.

In that presentation, it was stated that in the initial registration meeting, Ofsted would 'talk with you [the providers] about what properties we want to come and see, and why, but we may come and see ones that you suggest are done up to the standard that your other ones will eventually be done up to'. This undermines the point of independent inspection, and contradicts the accommodation standard found within the DfE's guidance - that all 'children [should] experience a comfortable and secure living environment.' (DfE, 2023) Without proper oversight, how will Ofsted know if properties are 'eventually done up', and what



about the children that are living in them now? Some providers have more than 80 individual settings – meaning that if Ofsted samples three of them every three years (as the inspection regime sets out) it will take more than 25 years to visit each place where a child lives.

It is dangerous for Ofsted to be saying to providers that they are open to suggestions about which settings to visit during the initial registration visit. This comment is not in the official guidance and should be clarified immediately. Randomised inspection exists to increase oversight and to ensure that they are safe while living in care.

- 4.3. Given that so much of this discussion hinges on what care means, and what good care looks like, last year Article 39 ran a survey for 16 and 17-year-olds living in England to ask, 'What does care mean to you?' on behalf of the Keep Caring to 18 steering group, which we are part of (Article 39, 2023). The survey was open for six weeks and got 355 responses in total. The first question asked survey respondents to state which factors were necessary for 16 and 17-year-olds (irrespective of care status). They were able to answer 'yes', 'no', or 'I'm not sure'.
- 4.4. Almost all (97%) of 16 and 17-year-olds said that it was necessary to have someone around regularly to chat and show an interest in their lives, the same proportion also said that it was necessary to have someone to show and tell you that you are loved, and to have someone to deal with emergencies connected to electricity, gas, internet connection and security. These factors are significant in that they are important factors for 16 and 17-year-olds to feel safe and settled in their environment. Some of them are reflected in the DfE's 'key principles which have been developed by care experienced young people, but others are not. How will Ofsted inspect providers against what is important to the children in their care and publish their findings for transparency? From the published inspection regime this remains unclear.

*Risks are identified, understood and managed effectively to keep children safe*

- 4.5. As we fed back in the Department for Education's consultation on the new semi-independent accommodation regulations, the Leadership and Management Standard is a weaker version of what already exists for children living in registered children's homes and will not in practice keep children safe. The main ingredient that is missing from the standard is having staff who have developed trusting and caring relationships with the children on-site 24/7. This helps keep children safe and mitigates the risk of them being harmed.
- 4.6. We do not believe that effective risk management can take place distanced from the place where children live. Ofsted has been clear that semi-independent providers can have the same nominated person and registered manager working across multiple settings at a distance. It was acknowledged on the recent webinar that Ofsted would need to see that the right oversight mechanisms are in place for one person to fulfil all these roles over as many as 80 settings. However, from our experience of running registered children's homes, we do not think one individual can fulfil all of these roles adequately and ensure that children are always safe.

- 4.7. From the webinar, it is also clear that Ofsted will not take into consideration how a provider has previously looked after the children in their care – despite this also not being stated in official guidance. Ofsted should only be registering providers who can demonstrate that they meet the criteria outlined in the regulatory regime and not those who have the intention of doing it at an undisclosed future date. Ofsted should use their knowledge of previous incidents in semi-independent accommodation to inform how they inspect in future in accordance with risk management principles, the biggest risk being that harm to children is repeated or prolonged without significant improvement.
- 4.8. Furthermore, it was also stated in the webinar that within the first registration visit there will be no need to speak to children with only the registered manager and the nominated person being interviewed. How then, will Ofsted assess how well a provider of semi-independent accommodation makes children feel safe and settled where they live, other than through self-reported information? There could be hundreds of 16 and 17-year-olds who live in semi-independent accommodation who never get the chance to speak to an inspector, which is particularly likely where the provider operates at a large scale.

*Leaders and staff respond effectively to children who may go missing or may be at risk of harm*

- 4.9. As discussed above, we firmly believe that the Leadership and Management Standard cannot be met in all settings and that staff cannot reasonably fulfil all of their responsibilities to children, especially when the conditions are such:
- High rate of children placed in ‘emergency’ situations – 1 in 3 16- and 17-year-olds now live in semi-independent accommodation when they first enter the care system (DfE, 2022).
  - Children living in shared accommodation with adults – while the registered person and staff need DBS checks (1aiii of the workforce plan), there is no requirement in the regulations for adults who live in the same place as children to have DBS checks (DfE, 2023)
  - Children living in bedsits – how can registered managers and staff reasonably ensure that the standards are upheld in a bedsit while ‘respecting children’s need for privacy?’ (1bvii of the accommodation standard) (1div) (DfE, 2023).
- 4.10. More than three-quarters of the 41 police forces who provided evidence to a parliamentary inquiry in 2019 on children who run away and go missing expressed concern about children being sent out of their home area to live in unregulated accommodation, and the risks this exposes children to (The Children’s Society, 2019).
- 4.11. The responsibility placed on the registered manager and nominated individual, where they are working across many different settings, is too great. For example, the



registered person has a responsibility under (1c) to 'ensure that children are protected from harm and enabled to keep themselves safe'. Yet in semi-independent settings where children live in a shared environment with adults, and staff members are not permanently on-site, there is an increased safeguard risk. Ofsted should clarify who it will hold accountable for failures where children routinely go missing and are exposed to harm - is it the provider or the registered manager? How will the registered manager of 80+ settings be expected to know if a child living in a bedsit without permanent staff goes missing?

- 4.12. We also note that details of expectations on the provider and staff are missing from this Ofsted consultation. While this consultation deals with an aspect of the new regulatory regime, inspection, we would expect more detail around what action(s) Ofsted will take when children routinely go missing and are exposed to harm and the provider fails to keep them safe. Given that semi-independent accommodation providers are currently registering we feel that is both reasonable for them to know what to expect and for the broader sector to understand how Ofsted will enforce standards across the sector.

*Staff manage situations well and apply and clear, consistent boundaries that contribute to children feeling safe*

- 4.13. It is not at all clear where the boundary lies between staff and children living in semi-independent accommodation, so how will Ofsted gauge that boundaries are being set and followed during the inspection?
- 4.14. In supported lodgings, for example, some of the standards cannot reasonably be met because of the nature of the accommodation. Hosts are to be considered staff (DfE, 2023), yet they will only take on certain roles and responsibilities of 'staff' as determined by the registered person (DfE, 2023). Where there is such a high level of discretion from setting to setting, how can boundaries purport to be consistent?
- 4.15. In response to the Department for Education's recent consultation, we raised the point that staff will not have a duty to individual children living in semi-independent accommodation, despite this being the case in registered children's homes. Standard 2 of the Children's Home Regulations 2015, which covers children living in residential care, says that "staff should protect and promote each child's welfare", while the accommodation standard for semi-independent says that staff should "promote and prioritise the welfare of children" (DfE, 2023). Can Ofsted clarify whether providers will be responsible for keeping children safe or making children feel as though they are safe?
- 4.16. Furthermore, within the DfE regulations, there is too much discretion given to providers of semi-independent accommodation about how they record incidents. For example, the guidance says that 'staff should keep appropriate records of self-harming incidents and share relevant information and decisions with the young person's placing/accommodating authority and other relevant professionals' (DfE, 2023). However, sharing of this information must be timely as it must be in

registered children's homes. Within the Hesley report, two significant factors in the prolonged abuse of children with disabilities were that information was not being routinely shared with Ofsted, and information was not always accurate. This inspection regime does not mitigate these risks enough.

- 4.17. Furthermore, the guidance does not stipulate whether the registered manager or staff will have a responsibility to update a child's records while they are living in semi-independent accommodation on topics other than restraint, missing incidents, and serious harm. In our residential homes, we record details about the day-to-day life of the children in our care. This provides something valuable for care experienced adults to look back on should they request their records in the future. This should be standard practice in any place where a child lives.

**Q5) To what extent do you agree or disagree that these are the main features of effective leadership and management of supported accommodation?**

Strongly agree

Agree

Neither agree nor disagree

Disagree

**Strongly disagree**

Don't know

- 5.1. The features listed as necessary for the effectiveness of leaders and managers are essential but only a partial list. How the features will be realised in practice is our primary concern. Based on the published inspection regime we do not believe it is feasible for leaders to be spread so thinly across settings while still delivering high-quality outcomes for children.
- 5.2. The second mission of the recent Children's Social Care Review was to increase the number of high-quality, stable and loving homes available for every child in care. This should be a part of the inspection criteria – Is the home stable concerning staff and the quality of the relationship between staff and children? Does the child feel loved in the environment? This is of importance to 16 and 17-year-olds themselves and something which is not reflected in the current standards (Article 39, 2023).
- 5.3. The new regulations on semi-independent accommodation open the possibility of a single registered service manager overseeing several forms of semi-independent accommodation, including shared accommodation with adults and supported lodgings. These forms of accommodation are very varied and may require different skills and knowledge. At the same time, the regulations do not require the registered manager to have a management qualification, as per the Children's Homes Regulations 2015. Instead, it is *"recommended that the registered service manager has a management qualification equivalent to Level 5 or should seek to acquire this*

*qualification within three years of registration*" (DfE, 2023). The registered person should be at least as qualified as those running registered children's homes.

- 5.4. Strong oversight is essential to make sure children are safe, feel secure and have high well-being. Considering that the registered service manager can run several forms of semi-independent accommodation, it is only possible to be present in some settings regularly. The regular absence of the manager from a setting gives rise to worries concerning their ability to protect the children in the setting, form relationships, and contribute to their positive experience of care.
- 5.5. Building relationships with children and staff can become problematic when the registered manager cannot be regularly on-site. We cannot see how the feature of *"positive and productive relationships between all professionals"* can be realised with this in mind. Without spending quality time with the children and getting to know them, it is also questionable how managers and leaders will have *"a good understanding of the progress children are making"* and *"high ambitions and expectations and be committed to achieving the best possible outcomes for children"*. As part of the inspection Ofsted should ascertain the level of attendance from leaders on-site through 1-1 conversations with the children that live there.
- 5.6. Styliana, a former residential social care worker in one of our homes said,

*"My experience working in a residential children's home helped me realise the importance of the registered manager being regularly present on site to build and maintain a trusting relationship with all children and staff. The regular presence of the manager helped achieve this, as they were able to use their experience to support staff with things related to the care of a child"*.

**Q6) Do you have any other comments about our proposals for inspecting supported accommodation?**

- 6.1. Our response is not intended in any way to endorse the new semi-independent regulations or inspection regime. However, we have considered each question posed in the consultation to provide constructive feedback.
- 6.2. The consequence of these reforms will be that 16- and 17-year-olds in care will live in settings which are now technically covered by a regulatory regime but which are not much safer than before the regime came into force. The cliff edge of support that care leavers face will move from 18 to 16.
- 6.3. As the regulator, Ofsted must help protect the lives of vulnerable children in the care of the State through its oversight. For the reasons we have highlighted in this consultation response, we do not feel that provider level registration conducted every three years, with no commitment on how Ofsted

will follow through with action where providers are underperforming is ambitious.

- 6.4. The new regulations change duties owed to each individual child into weaker general duties. It waters down the rights of children, and it potentially strengthens semi-independent providers' protection against liability for causing harm. Every place where a child lives should have a responsibility to protect them.
- 6.5. We believe that children (16&17) are at the most risk when they are placed in semi-independent accommodation which is shared with adults (18+). Where provision has different rules for different residents, such as those over 18s being allowed to drink alcohol in their rooms, there is the potential for young people to be exposed to negative influences and, unfortunately, exploitation (Longfield, 2020). Adults may be themselves battling with their own difficulties such as homelessness, mental ill health, addiction, or even transitioning from prison back into the community.

**Q7) What are the PSED (public sector equality duty) impacts of our proposals?**

- 7.1. Within Ofsted's equality impact assessment, it states that 'inspectors will visit a representative sample of premises and across the relevant categories for each service' to gather a breadth of evidence and that 'all available intelligence (for example, information from statutory notifications and from children's survey responses) will inform decisions about who we should speak to, and where we should visit.'
- 7.2. This contradicts what was stated in the mentioned webinar, where it was said that Ofsted may work with providers to identify which settings to visit during registration, and that Ofsted will conduct 'future focused' inspection irrespective of what has happened within the setting in the past.
- 7.3. There are two main public sector equality duty implications of the new inspection regime. The first is that it is still unclear whether or not Ofsted finds it acceptable for children with disabilities to continue to be placed in semi-independent accommodation. The guidance states that 'where a young person has complex needs and/or requires a greater level of ongoing care and supervision, we do not expect that supported accommodation would be appropriate', the wording makes this a suggestion, not an obligation.
- 7.4. According to DfE data, almost one in ten (8%) of children currently living in semi-independent accommodation has a disability (DfE, 2021). We know from our work supporting children and adults with disabilities that it can take years to get a diagnosis and subsequent support, so it could also be the case that

this figure is an underrepresentation. It is unacceptable for any child with special educational needs or a disability (SEND) to be living in semi-independent accommodation - and Ofsted should immediately clarify what action it will take when local authorities routinely place children with SEND into semi-independent accommodation despite them being entitled to care.

- 7.5. Furthermore, more than half of looked-after children living in semi-independent accommodation are from a Black, Asian or other ethnic minority background (DfE, 2021), so these proposals are likely to impact this demographic disproportionately. This should have been reflected in Ofsted's own impact assessment and is something that Ofsted should further monitor and report on following the regulation and inspection regime coming into place in 2023.