

Staying Safe – NCH response

NCH the children's charity

NCH welcomes this opportunity to respond to the DCSF's Staying Safe consultation.

NCH is the UK's leading children's charity. We run nearly 500 services and work with more than 178,000 children, young people and their families across the UK, some of the most vulnerable in our society. We complement our role in promoting social justice through our services by lobbying and campaigning for change. NCH is one of the main providers of Children's Centres and we are the sector's leading provider of preventative and intensive support to families with vulnerable children, including those in care, in trouble with the law, who are disabled and who have mental health problems. Our purpose is to help the most vulnerable children and young people break through injustice, deprivation and inequality, so they can achieve their full potential. Our vision is of a world where all children and young people have a sense of belonging, and are loved and valued. A world where they can fulfil their potential, shape their destiny and experience the joy of life.

Key policy points

- NCH welcomes the government's commitment to improving children's safety as set out in its *Staying Safe* consultation.
- We believe that childhood is a time for learning and exploring. Not only do young people need opportunities to learn about risk and how to keep themselves safe, playing and access to positive activities are essential for children's emotional development.
- When thinking about safety it is important to remember that some groups of children and young people are more at risk than others. To be effective this strategy will need to specifically address the safeguarding needs of vulnerable and disadvantaged groups.
- NCH would have liked to have seen more prominence given to the following issues within the consultation paper: strategies for tackling chronic neglect, responses to risk taking behaviour in older young people and how this is dealt with in a multi-agency context, the particular needs of children and young people with disabilities, services for child survivors of sexual abuse, and the needs of looked after children and young carers. Following this consultation process NCH would welcome opportunities to work with the government to share our knowledge and work in partnership to develop effective strategies in each of these areas.
- In order to develop a co-ordinated approach that reaches those children and young people most at risk, we believe that this strategy must work right across government. There are signs that this is already beginning to happen. NCH has welcomed the move to share responsibility for young people in the youth justice system between the Home Office and DCSF. This is encouraging but more still needs to be done. Children affected by domestic violence and young carers are both examples of groups of children whose needs are still too often overlooked – or where the incentives in the system and the sometimes competing priorities of different government departments can work against their best interests.
- NCH's early years and family support projects are finding that the families they work with have increasingly complex issues. Our projects believe they are experiencing higher thresholds when referring for child protection purposes. We are aware that the new structures relating to the role of the lead professionals' co-ordinating a response for children and young people

under this threshold have not yet been fully rolled out. While our involvement with the lead professional pilots indicates that these structures can be useful, we are concerned that this role will require a great deal of negotiation and support if it is to succeed when the initiative is mainstreamed.

- NCH believes that significant investment is needed in preventative services to promote the well-being of children, young people and families with multiple problems. Despite the rhetoric about prevention in national plans of action, efforts to translate this into practice and shift the emphasis away from crisis-led services to preventative services are being hampered by tightening eligibility criteria and funding shortages.

Questions:

1 a) How safe do you think children are?

This varies. To give a meaningful answer, policy makers will need to first consider - safe from what? Risks to children and young people vary both over time as well as between different groups of children and young people.

Trends in national statistics show that child homicides and infant mortality have remained relatively stable. But, the picture in other areas is less clear cut. To illustrate, below we look briefly at risk in relation to criminal victimisation (including sexual offences), bullying and road traffic incidents:

- Surveys suggest that children and young people are nearly twice as likely to be the victims of crime as adults, yet it is hard to talk authoritatively about children and young people's criminal victimisation when this data is not collected automatically in the British Crime Survey. This gap is particularly problematic given all we know about trends in under-reporting to the police, which apply particularly to children and young people. NCH believes that a mechanism must be found to ensure that children under the age of 16 are included within the British Crime Survey. Without this basic information it is impossible to get a true idea of children's criminal victimisation, and this invisibility has led to a continued lack of focused provision. Earlier this year, an independent review of the way that data on crime is collected recommended (in its report to the Home Secretary) that the BCS should be extended to under-16s. We understand that the government is now considering how to take this recommendation forward and would urge them to do so as a matter of urgency.
- Despite the high level of media attention given to stranger abuse, children and young people are most likely to be abused by a parent, a relative or someone they know. We know from research that sexual abuse of children and young people continues to be very significantly under reported. While welcoming the Home Office Sex Offender Review and the proposals contained within it in terms of safeguarding children and young people, we would like to see a greater emphasis on the provision of services for survivors as well as a recognition that a different approach is needed to address sexual offending by young people. NCH supports 'Stop it Now' in calling for a public health approach to sexual abuse prevention.
- Bullying as an issue has received a great deal of policy focus in the last few years. It is difficult to estimate whether bullying per se has increased, but what is clear is that new technologies present new problems. Children and young people now have to deal with bullying in the virtual environment, text and the use of phone cameras. There is also the advent of bullying on social networking sites. NCH has experience of young people being bullied via

these sites who have not always had the knowledge and skills to know how to respond. We believe the answer is not only about finding technical solutions, but also about creating a dialogue with young people.

- Although (as the consultation paper points out) there has been a long-term decrease in the number of children killed on our roads, this progress has been offset by recent figures which report an increase in fatalities for older young people. The latest Department for Transport statistics show that the number of young people killed on the roads has risen by a fifth, with the number of under 15 year-olds killed rising to 169 and the number of child pedestrian deaths increasing 13 percent to 71.

When asking the question: how safe do you think children are – it is also important to remember that some groups of children and young people are safer than others. Age, family circumstances and demographic factors all have an impact. So, for example, the risk of becoming a victim of child homicide is influenced by a range of social and economic factors as well as individual factors. These factors include social isolation, ethnicity, poverty and poor housing¹. It is vital that the DCSF's developing safeguarding strategy prioritises responses to help the most vulnerable and disadvantaged children and young people to stay safe.

Finally, we need to look at how safe both children and parents **feel** they are. The current discrepancy between risk and the perception of risk will need to be addressed if we are to strike the balance between freedom and safety. We know that misconceptions about risk can be powerful drivers for parents placing restrictions on young people's behaviour.

1 b) How good are we at giving children and young people the opportunity to explore, understand risks for themselves and to learn the skills vital for their development?

An important development has been the PSHE part of the school curriculum. This plays a key role in enabling children and young people to understand the concepts of risk, safety and the development of skills for life.

Outside of the school environment, there are important economic differences in the way that risk is managed. For example, many of the opportunities to take risk and manage it are offered in the context of organised leisure activities for children and young people - climbing walls and other sports that involve some risk. These are expensive and so not accessible by all.

NCH believes that the opportunity to take part in positive, structured activities is essential for young people's emotional development. We have welcomed the government's 10 year youth strategy, but would like to see a UK strategy developed that ensures that the most vulnerable young people are not prevented from taking up opportunities because of the availability of free transport, access to financial help to take part in an activity or because of problems caused by a young person's caring responsibilities. It is often the case that those who would benefit most from structured activities are the least able to access them. For further information about NCH's views on the role of positive, structured activities, please refer to the Growing Strong campaign pages on our website: <http://www.nch.org.uk/getinvolved/index.php?i=484>

¹ Home Office: Occasional Paper 84. Reducing homicide: Summary of a review of the possibilities (Fiona Brookman and Mike Maguire), January 2003

2 If you are a parent, what concerns do you have about your children's safety and how do you address these?

3 If you are a child or young person yourself, are the views of children and young people included here the same as yours and those of your friends?

4 a) As a member of the public, do you feel a sense of responsibility for protecting children?

4b) How far can we build this sense of responsibility in local communities?

Too often children and young people are seen as a threat, a problem that communities need protection from - rather than communities feeling that they have a responsibility to protect children and young people. NCH believes that the government must take an active lead in promoting a positive view of children and young people to combat the negative stereotyping that exists at present. The role of the media will also be crucial here. Thousands of children and young people make a real contribution to society but the media portrays them as anti-social, out of control and threatening. The media must portray children and young people in a balanced way, reflecting their contribution to society.

Locally, community based interventions can help to build stronger and more positive relationships between the young and old, and to reduce the often negative images of young people held by adults.

NCH Sure Start Central Link – intergenerational learning

The Walled Garden project is an NCH partnership with Age Concern aimed at intergenerational learning and the creative use of outdoor space. Age Concern occupies an historic house with extensive grounds, provided by the Pilkington Family Trust. NCH Sure Start Central Link and Age Concern have worked together to begin restoring the kitchen garden to create an accessible outdoor space used for play, learning about the environment, local history and sharing skills and experience.

There are other barriers to building a sense of community responsibility for the protection of children and young people, a powerful one of which is fear. According to a survey carried out by NCH and Chance UK earlier this year, more than one in 10 men (13 per cent) who don't volunteer with children and young people say it is due to fear of being perceived as a paedophile. Yet we know that positive male role models can make a huge difference to the lives of challenging children and young people. NCH and Chance UK have developed a partnership to offer mentoring programmes for challenging children aged five to 11 across the UK and we are appealing to men to come forward and consider becoming a mentor. We ensure that all our volunteers are checked by the police, trained and monitored, which we hope will encourage men to come forward as well as helping assuage the public's concern.

5 If you work with children and young people, do you know what your role is in keeping children safe?

NCH works to ensure that children and young people are protected from harm, promoting positive outcomes for the children and young people we work with. To this end NCH has developed an outcomes focused planning framework for our services

with a series of common indicators organised around national outcomes. This ensures that the services we provide are focussed and measurable. Our framework is in line with Every Child Matters, with a series of safeguarding indicators prominent.

The safeguarding of children and young people is central to everything NCH does. We have a responsibility to make certain that our employment, and other, processes ensure that those that work with children and young people are appropriate to do so.

The *NCH Safeguarding Framework for Children and Young People* is the overarching policy and procedure for protecting our service users from harm. This includes the NCH Child Protection Procedure. The policy and related guidance is a significant part of every new employees induction, ongoing training, supervision and appraisal programmes. The Safeguarding Framework also includes policy documents relating to child protection concerns involving employees, foster carers and volunteers, management accountability, information sharing and indicators across child development, parenting, family and environmental factors.

NCH is represented on a number of LSCBs where we contribute to the development of safeguarding practice, policies and strategies. NCH believes that the voluntary sector has a key role to play in safeguarding children and young people at an operational and strategic level. The voluntary sector should be represented on **all** LSCBs and calls on the government to issue stronger guidance on this issue.

6 Have we got the right balance between keeping children safe and also allowing them the freedom to develop?

As per question 1b: NCH believes that childhood is a time for learning and exploring. Not only do young people need increased opportunities to learn about risk and how to keep themselves safe, playing and access to positive activities are also essential for children's emotional development.

7 a) Are the roles and responsibilities set out in Chapter 2 correct?

The responsibilities listed for children's social care providers seem to be mainly reactive. NCH would like to see an emphasis on positive, preventative services featuring high on their agendas. In addition, it should be made clear that children's social care is provided by many different agencies – including the voluntary sector. The responsibilities of all those agencies with safeguarding duties under the Children Act 2004 should be spelt out.

It is not just central government which has responsibility for raising awareness. What about the role of the voluntary sector, local government and the media?

Various agencies/partnerships have not been listed including:

- The Government Offices in the regions
- Criminal justice agencies other than the police: i.e. youth justice services, the courts
- Other partnership bodies such as CDRPs, LCJBs and domestic violence forums
- The civil justice system, family courts and CAFCASS
- Asylum and immigration officials

7 b) What should the role of central government be, and what is the responsibility of local organisations and communities?

As listed above, plus all the tiers in between. Central government has a responsibility to hear and be heard – the information flow needs to work both ways. Central government's role is to create the right environment and agree priorities, with local government coordinating and enabling delivery of improved outcomes for children and young people. To achieve this they have a role in bringing stakeholders together and delivering solutions in partnership with local organisations and communities.

There is a need to clearly demonstrate that the responsibilities of central and local government cut across all departments and are not just the responsibility of the DCSF or children's services. To achieve this, consistent cross-cutting performance measures, backed with incentives and funding, are essential. NCH has welcomed the creation of the new DCSF and the revised performance framework. We are very encouraged by this more joined-up approach, and will be interested to see how this approach replicates itself at a local level.

8 How can local and central government do more to protect all children by reaching out to minority communities and those speaking minority languages?

We believe that both local and central government should do more to protect children and young people in minority communities and those speaking minority languages. This needs to happen in a strategic context with results carefully monitored. As a first stage more information should be gathered on needs and accessibility. What risks do children and young people from different minority communities face? Are there services available to meet these needs? Are they accessible? What are the barriers? Do current policies serve to protect or are they part of the problem?

NCH is undertaking a program of research to address some of these issues, looking at how to enhance the engagement of minority communities in services by ensuring they are accessible and relevant. NCH believes that there is no such thing as hard to reach groups, only hard to reach or inaccessible services. We are working to better understand the needs of minority communities in accessing services and will continue to share our learning to help develop more effective access to services for people from minority communities, thereby helping to ensure certain groups are not marginalised from attempts to safeguard and promote children's well-being.

Government action will need to include ongoing dialog with these communities as well as clear information about safeguarding that relates to their experience and culture. In this process of reaching out, working with partners will be essential. This is particularly true of the voluntary sector which is often more successful in reaching out to minority communities.

It is important that universal early-years services play their part. The ability of Children's Centres to meet the needs of the most marginalised families remains an area for improvement. As a provider of Children's Centres, NCH believes we have a responsibility to highlight how we have been successful in meeting the needs of the most marginalised and disadvantaged.

NCH's Kate's Hill and Sledgmere Children's Centre – reaching out to minority ethnic parents and children

NCH's Kate's Hill and Sledgmere Children's Centre, which is located in a very ethnically diverse community, found that a significant number of children spoke little or no English when they started school. Many of the families were very isolated and

were having difficulty accessing even basic services such as the local doctor or finding out what services were available to them.

To address this, the NCH team launched the early *Start English for Speakers of Other Languages Programme* at the Centre, helping both the children and their parents learn English and boost their confidence in local situations. By combining English with a focus on their children, this course enabled the team to reach families they had never been able to reach before.

Initiatives like those at Kate's Hill and Sledgmere Children's Centre are of particular importance given the unpredictable circumstances surrounding funding for ESOL language tuition (English for Speakers of Other Languages). Providing funding for language services in settings such as Children's Centres will enhance outreach to families from minority communities and help to protect children.

In order to safeguard and promote the welfare of young people at risk of experiencing racism, all agencies must continue to redress racist abuse, harassment and discrimination.

Building trust within minority communities is an effective way to protect children from harm. To engage with young people from minority communities, the government should take into account pre-established structures within these communities, which young people may turn to when faced with risk.

Specialist initiatives are also needed. A good example is the London Community Safeguarding Children Project (funded by the DCSF). This project, commissioned by the London Safeguarding Children Board and the Metropolitan Police Service, aims to promote awareness of safeguarding children issues amongst some of London's minority ethnic communities. Participating London boroughs each employ Community Partnership advisers to undertake local work in raising community awareness, with the central project coordination function carried out by NCH – The Bridge. Early results from the project indicate that:

- Participating local authorities had acquired better knowledge of their local communities and faith groups
- The project had built trust between statutory services, communities and faith groups as well as dispelling myths and misconceptions
- The children who formed part of the local communities and faith groups reached by this project had an improved chance of being safe.

The project has also highlighted the need for coordinated information sharing and the need for statutory service training on how to respond in four key areas: female genital mutilation, so called 'honour' based violence; abuse linked to a belief in spirit possession and child trafficking.

9 Are the areas we have identified for new action right? What other areas could be considered and what more could we do?

NCH believes that the areas for new action should include focused responses to both intractable safeguarding issues (such as chronic neglect), as well as an emphasis on services for specific groups of particularly vulnerable children and young people. Below we have set out a number of key issues which we believe require urgent and coordinated action:

Children and young people with disabilities

NCH is concerned about the low prominence given to the needs of disabled children and young people in the consultation document. This is worrying particularly as the available UK evidence on the extent of abuse among disabled children suggests that they are at increased risk of abuse, and that the presence of multiple disabilities appears to increase the risk of both abuse and neglect. Some of the reasons for this include that: disabled children living away from home have fewer outside contacts than other children; they may receive intimate personal care, possibly from a number of carers; or they have communication difficulties making it difficult to tell others what is happening. Analysis of one English County Council's child protection register found that, although disabled children made up only 2% of the local child population, they accounted for 10% of children on the register.² According to the Children in Need Census for England, disabled children are over-represented among children who are looked after because of abuse and neglect.³

Disabled children are more likely than non-disabled children to live in residential care. The issue of protection from abuse of disabled children living in residential settings has received much less attention than the protection of children 'looked after' by local authorities.

Children with a learning disability are much more likely to be bullied. Research shows that nearly all children with a learning disability are bullied and this has a devastating effect on their lives. To date, the Government has not commissioned guidance on disablist bullying but has produced guidance on other forms of prejudiced based bullying, including racist and homophobic bullying. There needs to be much more awareness raising and follow-through action in relation to the issue of safeguarding disabled children and young people, both within social care and health and within society as a whole.

Safeguarding of young people aged 16 and over

NCH has concerns about how the safeguarding agenda is applied to work with young people aged 16 and over. These young people face particular vulnerabilities, including risk taking behaviour as well as vulnerability to assault and exploitation. NCH believes that the safeguarding needs of children aged 16 and over should be given greater prominence within formal, multi-agency safeguarding arrangements. This should be backed by work to raise awareness and skills amongst a range of professionals, especially as the professionals that young people most regularly come into contact with, such as housing officers, may be less involved in formal safeguarding arrangements. Further engagement, training and regulation is needed within a strategic, multi-agency context.

Neglect

The experience of chronic neglect can be seriously damaging for children and young people. We know that the scale of the problem is significant, with a high number of children affected. In addition, DCSF statistics show that while the number of children on child protection registers has fallen, the number registered on the grounds of neglect has increased (in fact this is now the highest category for registration). We also know that data collected from registers provides only a partial picture. A substantial number of cases will not be picked up at all and others will be addressed through provision for children in need rather than through the child protection framework.

² Morris, J. (1999) 'Disabled children, child protection systems and the Children Act', *Child Abuse Review*, 8, 91-108.

³ Department for Education and Skills (2004) *Children in Need in England*. National Statistics.

While the problem is growing and its seriousness apparent, child neglect is difficult to handle. No single method of intervention is likely to be sufficient. The chronic and multiple nature of the problem necessitates a holistic, joined-up approach with a blend of services tailored to individual needs, possibly over a long period of time. While neglect is referred to in *Staying Safe* there is little detail about the new initiatives or approaches that we believe are necessary.

NCH is developing an action research project to explore practice development in the field of neglect. We are keen to liaise with the DCSF on all stages of this project, sharing our learning to help develop more effective responses.

NCH neglect pilots

The NCH neglect pilots will look at the lack of connection between services for families experiencing intense difficulties and hardship, and the absence of medium to long-term support for families who manage a crisis but require work to embed changes and build internal capacity. Children living in such families may be highly vulnerable as a result of cumulative, un-dramatic but very damaging experiences over long periods of time

The pilots will focus on work with families with a child under-eight whose developmental needs are being insufficiently met, placing them at risk of achieving poor educational, emotional and social outcomes. They will adopt a whole family approach where there is evidence of emerging vulnerability and additional unmet need requiring a multi-agency response. The pilot sites will include provision of additional capacity for direct work with children and their families. The intervention is likely to also include practical support from a project worker in the home to complement casework interventions. This will draw in expertise, build in links to local safeguarding processes and systems, and help to develop long term partnership working and relationships.

A key outcome of the project will be the improvement of skills and knowledge of NCH staff. The pilot will also be externally evaluated drawing out the learning and implications for other settings.

Child sexual abuse

NCH believes that the government must work to improve the availability of, and access to, therapeutic support services to children and young people who have been sexually abused. Therapeutic support services are essential for those children and their families who are not served by statutory mental health services. Currently the demand for these services far outstrips supply. We believe that the government should consider developing a cross-departmental strategy for the treatment of children and young people affected by sexual abuse. This is important preventative work as we know the effects and impact of child sexual abuse can continue into adulthood.

NCH runs eight therapeutic support services for children and young people who have been sexual abused. In recent years we have become aware that our projects have been receiving a greater proportion of self-referrals. We believe that this is because of a change in the threshold for referrals from social services departments, meaning that the only way that some children can now receive a service is via the self-referral route.

We are also aware that sometimes wider issues within the child's family can mean that direct work with children who have been sexually abused is not always appropriate in the first instance. Children need to be seen within the context of their family environment. Sometimes past child sexual abuse is one of a range of issues that will need to be addressed before accessing a therapeutic service becomes appropriate. Yet often we are still receiving these referrals. Additional work is needed to co-ordinate, plan and deliver specialist training and support to health, education and social care professionals, focussed on child sexual abuse, which supports positive outcomes for children.

NCH Safe and Secure research

NCH has been successful in obtaining funding from the Children, Young People and Families Grant Programme to fund a new, three year project focusing on the work of the NCH Child Sexual Abuse (CSA) services across the UK. The project will share good practice, promote service development – especially in developing CSA services for children with a disability, facilitate joint training with allied agencies, and increase learning and development.

As part of the project, NCH have entered into an agreement with Canterbury Christchurch University commissioning their research department to undertake a three year evaluation of the CSA work in NCH.

NCH believes that there is a relative lack of provision of services for children and young people who display harmful sexual behaviour, especially when you consider that one third of all sexual offences are committed by young people under-18 years. This important preventative work is undermined because service provision is patchy; yet there are some beacons of good practice. NCH calls on the government to learn from this good practice and to develop a national strategy for the assessment and treatment of children and young people with harmful sexual behaviour.

Private fostering arrangements

Privately fostered children must be afforded the same standard of safeguarding as those children who are cared for by childminders or accommodated by the local authority. NCH favours immediate moves to create and resource a registration scheme for private foster carers. Recent statistics show that current arrangements have not been successful in encouraging voluntary registration.

10 Would parents welcome a communications campaign and information on play and positive activities in their local area?

While most parents would welcome accurate local information on play and positive activities in their area, it will also be important to focus on the accessibility of these services.

11 What more should be done to enable children and young people to play safely and explore the outside world?

NCH believes that there needs to be more information about the relative risks to children playing outside as well as an increase in appropriate adults around play spaces. For example, the London Borough of Southwark now employs park rangers. These sorts of service need a high profile so that parents are aware that they exist

and so that children and young people know they can go to them if they need help. If we want to encourage children and young people to play safely and explore the outside world then we will also need to engage with parents more about what the real dangers are and how to address them.

12 Are children and young people taught enough in school about how to manage risks and stay safe?

Teaching staff need to develop their confidence to raise awareness and help children and young people to develop **practical strategies** for what they would do in a variety of different situations. For example, local authorities now have a responsibility to provide domestic violence education packs. But when talking about this issue, schools will need to be aware that domestic violence does not just affect adults, but also to look at adolescent relationships. Research shows that young people are the most likely to be a perpetrator or victim of domestic abuse, while surveys of young people's views on the acceptability of violence within relationships makes for depressing reading. In addition, other organisations, both commercial and public, need to be encouraged to work in partnership with education providers, i.e. social networking companies, local leisure facilities etc.

13 Is teaching safety education in Personal, Social and Health Education a good way to increase children and young people's resilience to harm? Are there other ways we could do this?

The development of the PSHE part of the school curriculum plays an important role in enabling children and young people to understand the concepts of risk, safety and the development of skills for life. But parents need to be made aware of what is learned.

As well as work through schools, we need to reach out to communities to promote all children and young people's resilience to harm. This will be particularly important if we are to reach out to the most vulnerable and disadvantaged children and young people (including those not involved in education). For example, some children will need individual support as they may not be able to communicate/learn in a group context i.e. children who have been traumatised or abused (and who are therefore more likely to undertake risky behaviours). Other children, including those with a disability, may need specialist approaches and communication techniques to build their resilience and ability to exert control over their lives.

At NCH we believe that a crucial factor to promoting resilience to harm is to work to increase children and young people's emotional well-being. In October this year NCH launched our campaign, Growing Strong which focuses on increasing the emotional well-being and resilience of children and young people. For more information about our Growing Strong campaign please visit the NCH website at:

<http://www.nch.org.uk/getinvolved/index.php?i=484>

14 How can e-safety be promoted to all professionals who are responsible for children's safety?

E-safety should be made clearly a children's safeguarding responsibility, included within the scope of the *Working Together to Safeguard Children* multi-agency guidance. In support of this, professionals must be provided with good quality information and have access to specialist advice. LSCBs will need to ensure that this issue is included within their inter-agency training and they will need to know that their staff have an understanding of the virtual environment and who they should

report to if they have concerns. Training and information will need to extend to professionals in a variety of settings, including those working within libraries and other leisure facilities. Furthermore, responses will need to include partners in the industry more consistently than is the case at present. To facilitate this, incentives for action should be considered.

15 What information would parents welcome about risks of harm faced by their children and how to manage them? What areas mentioned here would parents like more specific information about?

Parents require consistent, practical, realistic information, with explanations about emotive terms to avoid misconceptions. Therefore, if a person is barred from working with children etc. what this means in practice must be fully explained to parents (i.e. that they are not necessarily a sex offender). NCH also believes that the government will have to think very carefully about any information relayed about young people who are perceived to be a risk.

Working through Sure Start Children's Centres will be important in the early years, but the government will need to give more thought to how to relay information to the parents of older young people about relative risk. Working in partnership with voluntary sector service providers will be essential here.

16 What more could be done to help Local Safeguarding Children Boards (LSCBs) to make a difference?

Given the fact that LSCBs are still relatively new, and that their progress has just been reviewed, we believe that time must now be taken to consolidate learning; share best practice and address uncertainties and discrepancies.

We are reassured that the DCSF's priority review found that there is already good reason to be optimistic about LSCBs potential to make a difference. There are however some outstanding issues that need to be addressed:

- NCH believes that the safeguarding needs of young people aged 16 and over need to be given far greater prominence within formal, multi-agency safeguarding arrangements. Young people face particular vulnerabilities, yet it appears that LSCBs are currently geared towards meeting the safeguarding needs of younger children. LSCBs need to audit safeguarding services and responses to this age group to identify a national picture of good practice. Currently, the safeguarding needs of older young people are often ignored or minimised. Possibly this is indicative of the findings from the priority review that some LSCBs are not engaged with the broader safeguarding agenda and do not yet appear to be planning activity beyond their core responsive work on child protection.
- The voluntary sector is poorly represented on LSCBs at present. Work needs to be undertaken to ensure that third sector partners are enabled to have a strategic voice.
- Although the priority review found that overall LSCBs reported increased funding in the last two years, variation is still significant. It appears that attendance rates reflect the funding contributions, so that those partners who are consistent contributors make the most effort to attend the boards. There are still problems with uneven participation from Strategic Health Authorities and we are aware that variations in approach and levels of success continue to exist across the country.

- We believe that greater clarity of function, especially in terms of the relationship with the Children's Trusts and other strategic bodies (such as domestic violence forums) is needed.

NCH believes that some existing, national safeguarding procedures unintentionally discriminate against looked after children. An example of this would be that if children in care want to stay over night at a friend's house, checks have to be made on the parents of those they are staying with. This is clearly a different threshold for looked after children as their peers would not have to do the same.

17 How could training and development for social workers be improved?

18 Would a national safeguarding awards scheme help to raise the profile of work to improve children's safety?

The Social Care Accolades, which are awarded by the Care Council for Wales every two years, have been very successful although they do not have a specific safeguarding focus. However, it would be quite complex to set the parameters for a national safeguarding awards scheme, unless it was about good systems, best practice, understanding etc.

19 Will the beacon council scheme help to promote learning from good local practice?

20 How can we tackle inequalities in prevention of accidents? What role could national or local organisations play?

NCH recommends the facilitation of partnerships between direct providers of services to children and child accident prevention organisations, especially to engage with parents from diverse communities. The safety leaflets provided by child accident prevention organisations need to be made available in a range of community languages and should be available early on post birth.

21 What problems do professionals face in trying to address the needs of both the adults and children in the family?

In England, the split of adults' and children's social services has led to difficulties for some groups of children and young people. Responses to the needs of children and adults have not been fully coordinated, sometimes with conflicting targets/incentives serving to undermine joined up working. Effective safeguarding responses for children and young people need to recognise that whole family issues should be addressed before professionals can work on particular issues with a child or young person.

One group that has tended to lose out is young carers. This is in part because of increased difficulties in communication between adult and children's services and also because obtaining funding for whole family services has become increasingly difficult. If a child is caring for a vulnerable adult who has a mental health problem they may have particular safeguarding needs yet the range of agencies involved can be unnecessarily bureaucratic. A particular problem when working with PCTs is in accessing funds for community-based work. NCH believes that the government must pledge more support for young carers who lack information, formal support services and recognition for what they do. Currently, young carers' services in many local authorities face cuts.

22 Do some parents need help to access support available to them?

The answer here is very similar to that in previous questions. It is about identifying need and gaps and offering a range of flexible, local – and not always statutory - services. People differ so a range of options is needed, for example, parents whose first language is not English or for those with learning disabilities.

23 How can local areas ensure that children's and adults' services work collaboratively to safeguard and promote the well-being of children and young people affected by substance misuse, domestic violence or mental illness problems within their families?

Complex issues such as the well-being of children and young people affected by substance misuse, domestic violence or mental illness problems within families cannot be tackled by agencies working in isolation. A multi-agency approach is essential, cutting across children's and adults services and thereby linking the various partnership structures. Local authorities are in a key position to facilitate local partnerships, within the structure of the Local Strategic Partnership and Local Area Agreement (LAA) framework. LAAs will play an increasing role in marshalling all the local resources to deliver key community outcomes. A number of areas are already using LAAs creatively to pool funding and resources to tackle issues such as domestic violence. In support of this, clearer links are needed between LSCBs and MAPPA as well as between LSCBs and Adult Protection Committees.

Taking domestic violence as an example, local authorities have a duty to ensure local co-operation to improve well-being and to make arrangements to safeguard children in their local area. This duty should include identifying and responding to the needs of children living in households where there is domestic violence. However, current approaches to addressing domestic violence do not, in practice, often make the links between violence against children and domestic violence more broadly. Nor do they sufficiently address the safeguarding and support needs of children affected by domestic violence. The separation of children's and adult's services has exacerbated this situation, with children affected by domestic violence effectively falling down the gap between the Domestic Violence Crime and Victims Act (2004) and the Children's Act (2004).

To address this, the needs of children and young people affected by domestic violence must be explicitly addressed within the new structures for children's services and embedded within the prevention agenda for all vulnerable children. A major concern is safeguarding: children in private law cases need the same rights to protection and services as children in public law cases. Welfare and safety must be paramount with better safeguards for children built in before enforcing contact arrangements. Current arrangements, such as the revised gateway forms, are not sufficient to safeguard children. Further work is also needed to ensure that domestic violence, multi-agency risk management and safety planning processes specifically address the needs of children affected by domestic violence. All of this work will require leadership from the local authority, but with support built in from other key agencies under robust partnership arrangements.

24 What is the best way to reach parents who might need help with problems that are affecting their children's welfare? Would national or local communications help?

The answer here is very similar to that in previous questions. Children's Centres will play an increasingly important role here, promoting and facilitating services and

information sharing in local communities. Children's Centres should act as hubs and facilitators and will need to be properly resourced to undertake this important work.

25 Whose responsibility should it be to address bullying that happens outside school? How could local agencies work together to address this problem?

Bullying outside of school is clearly the responsibility of more than one agency. Local, multi-agency responses will need to engage communities and parents in bullying reduction. What we mean by bullying also needs careful consideration, as in some cases it may constitute a criminal offence (such as iPod theft) or be hate crime related (such as racist or disabilist bullying). Robust links between the community safety and children's agendas will need to be forged.

26 What role could LSCBs play in tackling gun and knife crime? Are there examples of good local or international practice which could be considered in more detail?

LSCBs have an important role to play in tackling gun and knife crime. Services work best when based on local knowledge and made appropriate to the particular area, according to the prevalence of the issue. NCH believes that hearing young people's views on this issue is crucial; agencies then need to share these discussions with other partners. LSCBs provide a suitable arena for agencies to share knowledge about their understanding of the issue and build cooperative plans. The voluntary sector also has a wealth of experience to share and should be represented on all LSCBs to share intelligence and good practice in this area.

NCH has been talking to young people locally and we are duly concerned by the levels of fear children and young people have about gun and knife crime. Even where this fear is disproportionate, LSCBs have a responsibility to ensure young people feel safe. The protection of children should be the role of LSCBs and yet fear and false-beliefs around self-protection can lead children to carry weapons to protect themselves.

It is imperative that local services co-operate to ensure that there are safe places for young people to go, where there are structured and well-organised positive activities. Where appropriate, LSCBs should provide a suitable forum for liaison between professionals - to organise education programmes in schools, FE colleges and youth groups for example. Partners involved in LSCBs are also well-placed to share policy and practice and work together to devise guidelines and training to reduce the carrying of weapons and prevent violence from escalating.

NCH Youth Intelligence Survey

NCH has launched an online Youth Intelligence Survey devised by the Rightfully Yours project in Croydon. The survey has been designed to enable young people to share their thoughts on gun and knife crime. It asks for their views on the impact and causes of gun and knife crime as well as what they feel are the key messages that the government needs to hear from young people.

The survey will run from 1 October till 1 January, when the results will be written up into a briefing and shared with key decision makers. The survey can be accessed from 2 October on the *Growing Strong* pages on the NCH website:

<http://www.nch.org.uk/getinvolved/index.php?i=534>

27 How can we make sure children have somewhere to turn to if they are being harmed?

As a first stage we need to consider who children and young people choose to speak to - ChildLine and other help lines, other young people as well as adults – and provide supporting resources and information. We have a responsibility to ensure that all children and young people have idea of what they should do if a friend tells them about a concern. This could be addressed through PSHE. What is key is that children have confidence that if they discuss these issues there will be a positive outcome for them.

For some children and young people, routes to finding help and support are particularly problematic. For young people trafficked or abused through prostitution, the government needs to ensure that there are appropriate services that will support them getting out of these situations. Children in trouble with the law or in young offender institutions (who will frequently have a history of abuse) need easy access to confidential support. The same applies to children and young people with insecure immigration status.

28 a) Does the government need to communicate with the public to improve people's ability to identify and know how to act on concerns about children's safety?

Yes, this is an area that requires constant attention. What is needed is clear and consistent information that reaches parents, children and young people through a variety of sources. At the moment this is not happening.

There are particular areas where messages are confused. A prime example is the law on the physical chastisement of children. NCH is concerned about the level of protection children receive in law from assault. We further believe that the law in this area is confused and does not provide equity between children and young people and adults. This lack of clarity in the law has led to confusion for both parents/carers and service providers.

Another problematic area is the process for barring people who are unsuitable to work with children and vulnerable adults, through arrangements under the new Independent Safeguarding Authority. NCH remains concerned about the complexity of the proposals. In our response to the consultation on the new procedures we stressed the need for clear guidance on their use, as well as the need for information for agencies and the general public explaining the reasons people might be barred from working with children. NCH supports the 'Stop it Now' prevention work and public health approach to prevention.

28 b) What effect would this have on local services, such as children's social care and the police?

Clear communication about risk is likely to have a number of impacts. Improved identification of children at risk could lead to an increase in referrals to both children's social services and to the police. It might also mean that referrals are received at an earlier stage – affecting the type of service response needed – or that there is a reduction in inappropriate referrals.

Clearer communication should also clarify in the public's mind the respective roles of the police and social care professionals, as well as alleviating misguided concerns. A reduction in confusion should help both professionals and parents/carers alike.

29 How can we protect children crossing our borders from harm? How can immigration officers work best with others in their local area?

Refugee and asylum seeking children and young people must be given the same rights to protection and support as other children currently in the UK. NCH is concerned that these children do not benefit from the same levels of protection as other children.

We have major safeguarding concerns about some of the proposals relating to voluntary returns programmes, especially the suggestion of introducing a voluntary returns programme that uses a system of reducing financial support as a means of encouraging young people to leave the UK. NCH is concerned that the emphasis on encouraging removal may be detrimental to the task of protecting vulnerable children. Local authorities must consider whether return would promote the child's welfare and return should only be considered if it is in the child's best interest, as determined by suitable reception conditions. The agencies involved must ensure that planning for young people includes an assessment of the specific conditions affecting the young person in the country of origin and the particular arrangements proposed. The work undertaken to date in developing more child welfare appropriate returns programmes should continue.

Age assessment practices have also raised safeguarding issues and the Refugee Children's Consortium has expressed concerns about the implications of imposing reporting and residence requirements and using young people's biometric information. With all of these practices, immigration concerns must never undermine our responsibility to ensure that children's well-being is paramount, particularly as asylum seeking and refugee children are often among the most vulnerable and disadvantaged children of all and should be offered protection, care and support.

NCH believes that no unaccompanied minor should be housed in unsupported accommodation and the quality of any supported accommodation used must be ensured through greater regulation so that proper levels of support are provided. Local authorities with high numbers of unaccompanied asylum seeking children must be funded by central government so they can provide this vulnerable group with adequate support. Decisions to transfer children to specialist authorities must be guided by the duty to safeguard and promote a child's welfare. The responsible local authorities must be able to demonstrate they have the necessary expertise and knowledge to address the needs of this group of vulnerable young people.

The shift to 17½ years old as the age limit for discretionary leave to remain provides an inadequate protection framework. The welfare needs resulting from the age and vulnerability of these people is more important than their immigration status and rights provided under the Children's Act still apply at this age.

An ethos of information-sharing within a multi-agency setting must be achieved, in which the practical and psychological needs of this vulnerable group of young people are met. Immigration officers must have knowledge of appropriate services in the local area to direct young people to, so that the support needs of children who have crossed our borders can be met.

NCH supports steps taken by the government to keep children arriving in the UK safe from harm. However, NCH has concerns about the exclusion of immigration officials from the Children Act safeguarding duty to promote the welfare of children. Despite its status as a weaker safeguarding tool, the introduction of a Code of Practice for immigration officials is welcomed as a step in the right direction - action must now be taken to ensure further training and comprehensive implementation.

To ensure that interviews introduced by the new asylum model for children over 12 are child-friendly, young people should be accompanied and be given the advice they need to be fully prepared. The care, protection and fair legal representation of asylum seeking children would be improved by the appointment of statutory guardians.

30 Would professionals working with children and young people welcome clear information about cross-border issues to help with potential concerns?

NCH believes that professionals would very much welcome this information.

Many young people going through the asylum system experience great confusion and fear about the process. Training about the New Asylum Model should be provided for all practitioners who come into contact with asylum-seeking children, including social workers and teachers in dispersal areas and those with a high proportion of asylum-seeking children. This would help professionals to promote the welfare of those children alongside the NAM case-owner who will be responsible for the asylum claim.

If professionals are well-informed and properly trained, it will help them deal with harm the young person may face as a result of the negative presentation of asylum-seekers in general. Particular help should be given to foster carers so that they can help the young people in their care to better understand their rights, choices and the possible outcomes of the process.