

## **Safeguarding Indicators and Statutory Targets: Consultation Response Form**

The closing date for this consultation is 8 December 2009  
Your comments must reach us by that date

### **How to Use the Form**

You can either use your mouse or the **TAB** key to navigate through the form and move from field to field. Press the **TAB** key to move forward from one field to another or **SHIFT+TAB** to move backwards from one field to another.

This form uses either checkboxes  or free text fields . Checkboxes can either be checked  or unchecked . To check a checkbox simply click you mouse on the appropriate checkbox once. To remove the check mark just click you mouse on the appropriate checkbox again. Please check only one checkbox per question. To fill in a free text field just click once on the appropriate field and begin typing. There is no word limit on free text fields.

### **Freedom of Information**

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

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If you want all, or any part, of your response to be treated as confidential, please check this box  and provide an explanation in the free text field below:

Please also complete the following fields:

Name: Alan Coombe, Policy Advisor

Organisation: National Society for the Prevention of Cruelty to Children

Address: Weston House, 42, Curtain Road, London, EC 2A 3NH

## **Responding to the Consultation**

Once you have completed the form please save it and email it to:  
[safeguarding.indicators@nsdu.gsi.gov.uk](mailto:safeguarding.indicators@nsdu.gsi.gov.uk)

Alternatively, please print the completed form and send it to:

Indicators and Targets Consultation,  
National Safeguarding Delivery Unit,  
Department for Children, Schools and Families,  
1<sup>st</sup> Floor, Sanctuary Buildings,  
Great Smith Street,  
London SW1P 3BT

## **Safeguarding Indicators and Statutory Targets: Consultation Questions**

### **Chapter 4 – Proposed Indicator Package from 2011-12**

#### **4.8 CONSULTATION QUESTIONS:**

- a) **Do you agree with the retention of NI 60 as a national indicator?**

YES       NO       DON'T KNOW

- b) **Are there any technical issues with this indicator that need to be considered?**

YES       NO       DON'T KNOW

**COMMENTS:** To be understood - as with NI 61 ( 'timelines of placements of looked-after children for adoption following an agency decision...' ) - as a timelines indicator.

#### **4.10 CONSULTATION QUESTIONS:**

- a) **Do you agree that this revised version of NI 59 should be included in the National Indicator Set?**

YES       NO       DON'T KNOW

- b) **Are there any technical issues with this indicator that need to be considered?**

YES       NO       DON'T KNOW

**COMMENTS:** Ten days is more reasonable

#### **4.12 CONSULTATION QUESTIONS:**

- a) **Do you agree that this indicator should be included as a new national indicator?**

YES       NO       DON'T KNOW

- b) **Are there any technical issues with this indicator that need to be considered?**

YES       NO       DON'T KNOW

**COMMENTS:** This indicator - percentage of initial child protection conferences which were held within 15 working days - needs refinement to serve its purpose. If it is to prove

meaningful it needs to capture whether all pertinent agencies attended the conference. Poorly attended conferences do not indicate an effective multi-agency response - in fact the contrary. As the indicator is currently drafted, responses could erroneously create the impression of effective multi -agency work, simply and solely because data that would easily provide evidence to the contrary is not required, collected or collated.

4.14 CONSULTATION QUESTIONS:

a) Do you agree with the removal of NI 67 from the National Indicator Set?

YES  NO  DON'T KNOW

b) Are there any other indicators on timeliness and process that you think should be considered for inclusion in the National Indicator Set from 2011-12?

YES  NO  DON'T KNOW

**COMMENTS:** As noted, the number of reviews of child protection cases within required timescales has remained constant at 99% for 4 years, and the indicator therefore serves no purpose as a spur to improvement. Data to be published in the Children in Need census should provide intelligence, through the Statistical Release, of any drift from this high level of compliance. We urge that this is closely monitored and that if necessary there should be prompt recourse to more formal methods of reporting.

4.17 CONSULTATION QUESTIONS:

a) Do you agree with the retention of NIs 64 and 65 as national indicators?

YES  NO  DON'T KNOW

b) Are there any technical issues with these indicators that need to be considered?

YES  NO  DON'T KNOW

**COMMENTS:** Ofsted calls for greater attentiveness to the safeguarding needs of disabled children in the inspectorate's most recent evaluation of serious case reviews, ' Learning Lessons: Taking actions.' This paucity of information about the numbers of disabled children who suffer abuse and neglect would be redressed if disability was reflected in all the national indicators. A first priority should be afforded to reporting on the numbers of children subject to child protection plans of two years or greater duration ( NI 64). Given the detailed information

about children that should have been collated and reflected upon over that time, including their disability, useful data should prove readily available. If it is not, this would provide informed cause for concern and highlight the need for action to address the situation.

4.21 CONSULTATION QUESTIONS:

a) Do you agree that this indicator should be included as a new national indicator?

YES       NO       DON'T KNOW

b) Are there any technical issues with this indicator that need to be considered?

YES       NO       DON'T KNOW

**COMMENTS:** An indicator regarding court applications is sadly necessary. However, relying solely on a record of missing core assessments provides too blunt an instrument to effect appropriate improvement. We understand that missing or incomplete assessments were identified as a key indicator by focus groups hosted by the Ministry of Justice, though solely by report as we were not party to these discussions. We are aware that this view is supported by the Care Profiling Study undertaken by the University of Bristol in 2007 ( Ministry of Justice Research Series 4/08 - March 2008) and by the Review of Child Care Proceedings in England and Wales published by the Department of Constitutional Affairs in May 2006. We recognise the relationship between this indicator and NI60 ( percentage of core assessments carried out within 35 working days of their commencement) and the potential to effect a better understanding of how the core assessment process is working. However, we would suggest : 1. that a better measure would be the number of cases where proceedings have been subject to delay and the percentage of these where a core assesment was not available, and 2. that the existence and completeness of core assessments are not the only factors that should be measured. If this indicator is to be helpful to those managing court processes, some measure of the quality of the core assessments that have been provided needs to be available . We recommend this at c) below.

c) Are there any other indicators in this area which you feel might support the work to reduce damaging delays in the time it takes to progress care proceedings?

YES       NO       DON'T KNOW

**COMMENTS:** A quality rating of assessments provided the court, according to clear criteria , to identify these as: helpful/not

helpful/incomplete or absent.

4.23 CONSULTATION QUESTIONS:

a) Do you agree with the removal of NI 68 from the National Indicator Set?

YES  NO  DON'T KNOW

b) Are there any other indicators on quality of service that you think should be considered for inclusion in the National Indicator Set from 2011-12?

YES  NO  DON'T KNOW

**COMMENTS:** Variation in interpretation of this indicator (percentage of referrals to children's social care going to initial assessment) does cause a lack of clarity, but that does not mean that the information, if better defined and refined, cannot be helpful in understanding how concerns are dealt with by local agencies, nor is it a reason for abandoning it. There are two options which would make the data more useful. These are 1. either describing a wider range of early responses( completing CAF - talking to another agency/worker - contacting a family member - talking to parents - talking to/seeing the child) or 2. more tightly defining 'initial assessment'. As an additional indicator from 2011 - 2012, though preferably 2010-2011, we would suggest the following indicator: 'percentage of agreed recommendations in child protection plans that have been actioned within six months.'

4.28 CONSULTATION QUESTIONS:

a) Do you agree with the inclusion of the above workforce indicators in the National Indicator Set?

YES  NO  DON'T KNOW

b) Are there any technical issues with these indicators that need to be considered?

YES  NO  DON'T KNOW

**COMMENTS:** There are possible unintended consequences of this indicator, namely, an incentive to retain poorly performing staff, and an incentive to recruit poorly qualified staff.

c) Do you have any views on when the best point during the year

would be to collect data to support these indicators?

YES  NO  DON'T KNOW

**COMMENTS:** February, May, June, August or November i.e. outside of key recruitment periods, namely the start/end of the financial, calendar and academic years.

d) Are there any other workforce/capacity related indicators that you think should be considered for inclusion in the National Indicator Set from 2011-12?

YES  NO  DON'T KNOW

**COMMENTS:** 1. Regularity/quality of supervision. 2. Experience - 'percentage of the workforce with five years or more, of the previous fifteen years, working in UK children's social care.'

#### 4.33 CONSULTATION QUESTIONS:

a) Do you agree with the inclusion of the combined indicator on child deaths and injuries in the National Indicator Set from 2011-12?

YES  NO  DON'T KNOW

b) Are there any technical issues with this indicator that need to be considered?

YES  NO  DON'T KNOW

**COMMENTS:** The Child Death Overview Panel (CDOP) data is sufficiently robust to provide a useful indicator of local preventable child deaths. We wish to see NI 70 retained as a separate indicator, but amended to record 'episodes' rather than the narrower 'admissions.'

#### 4.35 CONSULTATION QUESTIONS:

a) Do you agree that this indicator should be included as a new national indicator?

YES  NO  DON'T KNOW

b) Are there any technical issues with this indicator that need to be considered?

YES  NO  DON'T KNOW

**COMMENTS:** 'TellUs' does not provide data about maltreatment in

the home. Nor does it capture the views of very young children. To serve its purpose it would need to be extended to capture this data. An alternative would be a survey to establish the percentage of children, and within that population the percentage of disabled children, who feel their concerns about their own safety will be taken seriously by local agencies, and who can identify a source of help.

## **Chapter 5 – Proposals for Further Indicator Development for Consideration for the National Indicator Set from 2014-15**

### 5.18 CONSULTATION QUESTIONS:

**a) Do you have any comments about the areas identified for future indicator development work?**

**COMMENTS:** We support the intention to develop indicators with respect to domestic violence, mental health etc and believe these could be well informed by the forthcoming guidance from the NSDU. We would also suggest that an indicator on the affects of domestic violence upon children should be informed by the learning in the research commissioned by the NSPCC of the University of Central Lancaster; 'Children and families experiencing domestic violence: police and children's services responses' ( September, 2009)

**Are there any areas that are not considered above which you think should be?**

**YES**

**NO**

**DON'T KNOW**

**COMMENTS:** Percentage of agreed recommendations in child protection plans that have been actioned within six months; percentage of schools judged to be satisfactory or better at safeguarding support; Children's hospital and Accident and Emergency episodes classified as assault (UK Statistics Authority code ICD X85 - Y09); suicide and self harm reports for children; percentage of adults saying that they would know what to do if they were worried about the safety of a child (survey based); percentage of local voluntary sector organisations aware of their vetting and barring responsibilities.

## **Chapter 6 – Potential Statutory Safeguarding Targets for Introduction in 2011-12**

### 6.3 CONSULTATION QUESTIONS:

**a) Which of these indicators do you think should form part of the suite of statutory safeguarding targets (please list in preference order)?**

**COMMENTS:** 1. NEW(3) - unintentional/deliberate injuries and preventable deaths; NEW(2) - percentage of children who report they feel

safe; NI60 - core assessments; combined NI 64 and 65 - child protection plans.

- b) Do you think that any of these indicators would be inappropriate for statutory target setting purposes? If so, why?

YES  NO  DON'T KNOW

COMMENTS:

- c) Are there any indicators highlighted in bold at paragraph 4.1, which are not mentioned at paragraph 6.1, that you consider should form part of the suite of safeguarding statutory targets? If so, why?

YES  NO  DON'T KNOW

COMMENTS:

#### 6.7 CONSULTATION QUESTIONS:

- a) Do you think that the 'improvement triangle' would be a useful basis for constructive conversations around improvement priorities and target setting?

YES  NO  DON'T KNOW

COMMENTS:

- b) Do you have any views on which indicators should populate the axes of the 'improvement triangle'?

YES  NO  DON'T KNOW

COMMENTS: The examples given for 'capacity', 'quality' and 'process' seem well chosen

- c) Are there any factors not represented in the model that you think should be?

YES  NO  DON'T KNOW

COMMENTS: