

DHSSPS consultation on an Accreditation Scheme for Non-regulated
Organisations Working with Children

Response by NSPCC Northern Ireland

March 2007

Introduction

1. The NSPCC is the lead voluntary child protection agency in the United Kingdom. The Society is unique in having statutory powers under the Children (NI) Order 1995 and operates 20 projects in Northern Ireland. These include a broad portfolio of services relating to child protection and prevention, safeguarding, working with victims, family support, training and consultancy, research and policy development and listening services. The Society also plays an important role in external safeguarding such as through the Child Protection in Sport Unit in a sector where these proposals are particularly relevant.
2. The NSPCC are fully supportive of the development of an accreditation scheme that will enable unregulated voluntary organisations to become accredited and kitemarked by demonstrating their competence to safeguard children within their organisation. In responding to this consultation we have followed the format provided and highlight a number of areas in which we believe the proposals might be developed and strengthened.

Suggestion for improving the process

3. The intent behind accreditation arrangements introduced in the Protection Of Children & Vulnerable Adult (NI) Order 2003. have to an extent been superseded by the measures in the Safeguarding Vulnerable Groups Act 2006 (SVG). The Act extends statutory regulation into many previously unregulated organisations and sectors which might have been picked up in the accreditation scheme as it was originally conceived. Nonetheless, the NSPCC views the accreditation proposals as still having considerable merit and a positive and complementary measure to the Act and the Northern Ireland Order that will follow this year. The importance of accreditation in Northern Ireland in terms of improving vetting and barring arrangements was repeatedly made during the Westminster passage of the SVG Act and we are pleased that it has been accepted by Ministers for this jurisdiction. In relation to this, the NSPCC do not believe that defining the standards for accreditation via regulations is necessarily the best way to ensure the implementation of safeguarding measures within the voluntary sector. With the exception of a regulation under Article 19 in regard to an appeal against the refusal by the department to accredit an organisation, we would suggest that the scheme could be developed via administrative arrangements and guidance which would allow it to develop without the need for regulations.

4. The NSPCC would be concerned that some headquarter/umbrella organisations may be delayed or restricted in their achievement of accreditation due to a limited response from a small number of their member organisations. In some cases organisations may present as Headquarter organisations but may, in practice, have limited authority over member organisations. We recognise that the accreditation of individual member organisations would not be cost effective and too resource intensive for the accrediting body. Therefore, there is a need for a clear system to enable Headquarter/umbrella organisations to become accredited along with the member organisations who are responsive to implementing the standards of best practice. It would not be appropriate to limit some member organisations due to the lack of interest from other clubs or churches under the umbrella of a Headquarter organisation. This flexibility is needed in order to take account of the positive work undertaken by some Headquarter and member organisations to promote safeguarding measures. There needs to be a process whereby faith based organisations or sports clubs can see the benefits of their colleagues engaging in the accreditation process. This is likely to encourage some organisations / clubs to step up to the standard attained by their peers rather than a whole organisation being restricted.

5. The NSPCC realise that the DHSSPS have clearly stated that there will be no additional finances made available to support voluntary organisations in mentoring them through the accreditation process. However, we would not wish to see an organisation's enthusiasm or commitment to the process being limited due to financial restraints or the lack of access to those with the skilled knowledge to support them. If implementing safeguarding measures becomes too expensive then this may, in the future, have other negative effects on organisations seeking insurance. Therefore, we would support the idea of a dedicated website with resource materials and sample good practice materials available for organisations to adapt and endorse as their own.

6. Access to training is another area of concern for the NSPCC. We are aware of the benefits to voluntary organisations of the availability of child protection awareness training in the EHSSB area via the Keeping Safe model and the Community Sector training in the SHSSB. Nevertheless, we are concerned that access to child protection awareness training for all voluntary organisation is not free and accessible across Northern Ireland, leaving some clubs and organisations in some areas at a disadvantage. Access to awareness training is the cornerstone of creating a culture of change in society where the voluntary sector accepts their responsibility to safeguarding children and young people.

7. Under the heading of Internal Modernisation of Soft Evidence it is particularly essential that the assessor has the skills to engage with children and young people. There is a need for guidance on how best to engage children and young people which considers ethical issues such as informed consent, parental consent and confidentiality.

The six standards

8. NSPCC believes that the six standards as set out are at a suitable level and will create a safer environment for children. We do not think that additional standards are required. However, in order to make accreditation attainable, we think that some of the questions and indicators set out in the pilot need to be termed 'where applicable' as some organisations may struggle to provide evidence. We are thinking in particular of the following under:

Effective Management

- Written statement in contract/agreement detailing the length of probation/trial period.
- Written form/minutes of meeting/letter at conclusion of probation/trial period.
- Statement outlining provision for regular support and supervision
- Written statement that an appraisal/ annual review is provided for all staff/volunteers

Sharing Information

- Should include facility to take a grievance
- Confirmation from staff that they have received / know how to access these procedures
- Confirmation from person(s) responsible for providing staff with guidelines on grievance procedures

General Safety & Management of Activities

- Appointed or qualified first aider to be named. - Guidelines mean that a first aider may not be necessary for smaller organisations.
- Written procedures for fire drills

Awareness raising

9. The actions proposed by the DHSSPS to increase awareness among community/voluntary organisations of the accreditation scheme are required to ensure accessibility. NSPCC would also suggest that, when considering a promotional strategy, the development of an accompanying parental leaflet that mirrors the standards set under accreditation should be considered. In addition to this, the DHSSPS should also ensure that other government departments are fully

committed to promoting the accreditation process through both the positive promotion of the standards and by ensuring that access to public funds/grants is linked to attainment on the working towards status of accreditation. We believe it would be inappropriate for one government department to be managing a system on improving safeguarding measures, while another continued to offer financial support, rate relief etc to organisations to work with young people who did not work to the standards endorsed by the DHSSPS. *It is essential to have inter-departmental responsibility to ensure that other departments and next step agencies take a more pro-active role.*

Prioritisations of accreditation applications

10. In paragraphs 4 we raised the issue of Headquarter organisations being able to differentiate between those member units who respond proactively to accreditation and those who are reluctant to implement good practice. To be able to achieve the greatest influence it is essential that genuine Headquarter organisations are offered the opportunity to register with the accrediting body. The NSPCC believe that priority should be given to those organisations who receive funding from government to work with children and that these organisations should also be a priority when undertaking a promotional strategy.
11. It would also be important to retain records of organisations/clubs which have expressed an interest in accreditation but, for whatever reason, have been unable to enter the process. These organisations/clubs should still be provided with information and resources to enable them to self-assess and implement good practice standards without being formally engaged in the accreditation process.

Addressing financial concerns

12. We have previously stated the importance of accessible training throughout Northern Ireland and believe that this should be the responsibility of the local HSSBs under the new Safeguarding Board arrangements. Costs should not be prohibitive considering the new costs organisations will already incur with the introduction of Access NI. Even for those organisations which only have volunteers there are still registration costs, storage of confidential records and hidden administration costs.
13. It is essential that the proposed review of training not only considers how best to meet the accreditation requirements but acknowledges the time commitment of volunteers/parents already offering their time free for the benefit of our wider society. With this in mind we would suggest focusing on 'Child Protection Awareness' (CPA) training for everyone working with children as a minimum requirement. This should be

supplemented with workshops for designated officers which builds on the learning from CPA but concentrates on the specifics of their role.

14. We would recommend shifting the focus away from the number of minimum hours to prioritising the learning outcomes for the different requirements of the training. A third workshop should be made available for those with management/governance responsibility to assist in the implementation of the standards outlined in accreditation. All of these training opportunities will have different outcomes but should be structured in a way that makes them accessible to volunteers. Ensuring that training is accessible and free to the voluntary sector will substantially reduce any mentoring costs that organisation may still choose to pay for.

Dovetailing accreditation schemes

15. The NSPCC believe that encouraging the dovetailing of other accreditation schemes that match the standards proposed by the DHSSPS is a positive approach to take. This would likely ease the pressures on the assessment centre. However, again, this will require an interdepartmental approach to ensure linkages with other adequate schemes.
16. NSPCC is aware of a number of similar schemes. Currently the Sports Council NI operates a Junior Club Mark scheme that is available to clubs. However, the standards in relation to safeguarding children fall short of the DHSSPS standards. We believe that other next step agencies (NSA), Non-Departmental Public Bodies and Executive Agencies such as the Arts Council for Northern Ireland should also be in a position to develop their own schemes as they have responsibility for administering public funds.
17. It is likely that there are other NSAs who have well structured financial controls on the administration of finances to ensure the returning of receipts for money spent. These NSAs could equally develop schemes to assess an organisation's ability to safeguard children under their care. The development of dovetailing schemes would require NSAs to acknowledge that their governance responsibility should not be focused on financial auditing to the exclusion of auditing safeguarding measures.

Awareness of responsibilities under POCVA

18. Organisations may require ongoing support to enable them to fulfil their responsibilities to refer to the POCVA list. Concerns around potential legal costs and challenges will remain key issues for many voluntary organisations. As such, DHSSPS must be able to respond to enquiries

and offer advice in addition to the issuing of 'Choosing to Protect'. The NSPCC would also seek clarification on the duty to refer in relation to organisations who have a 'working towards' status. Information about an accredited organisation's duty to refer to the DWC (NI) list should also be provided to the wider public and parents, as well as those in administration positions within organisations.

Key actions, timescales and monitoring

19. The NSPCC believe that information sessions should, like child protection awareness training, be free and locally assessable. Overall, we are supportive of the key actions outlined in the consultation document but would be concerned about future plans for the accreditation scheme after the initial four years. We realise that after an initial rush of applications there is likely to be a tailing-off period. However, achieving a longer term cultural change in the voluntary sector's response to safeguarding children will require continuous financial commitment from government.

Conclusion

20. On the whole, NSPCC is very supportive of the accreditation scheme and looks forward to its implementation in the near future. We believe that, with the appropriate commitment and resources, it is a significant step in promoting the safety of children and young people in Northern Ireland.

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