



## **NSPCC CYMRU/WALES RESPONSE TO:**

### **Working Together to Reduce Harm: The Substance Misuse Strategy for Wales 2008-2018**

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NSPCC Cymru/Wales welcomes the opportunity to respond to this consultation on the substance misuse strategy for Wales 2008-2018.

The NSPCC's purpose is to end cruelty to children. Our vision is of a society where all children are loved, valued and able to fulfil their potential.

We seek to achieve cultural, social and political change – influencing legislation, policy, practice, attitudes and behaviours for the benefit of children and young people. This is achieved through a combination of service provision, lobbying, campaigning and public education.

**We have responded to the set consultation questions where we feel we have the practice experience and knowledge to do so. Questions answered are detailed in bold italics before each section, please be aware that not all questions have been answered.**

***General Comments:***

NSPCC Cymru/Wales agrees in principle with the development of this 10year substance misuse strategy. However, we were disappointed not to find much reference throughout its content to the National Service Framework for Children, Young People and Maternity Services, and also the Parenting Action Plan (currently being reviewed by the Children and Young People Scrutiny Committee of the National Assembly for Wales). Despite good references to other cross-cutting strategies, we felt that these should also be included. We would therefore urge the Welsh Assembly Government to address this and make the necessary links as appropriate.

***1. Do you agree with the draft strategy direction in relation to harms caused by substance misuse in Wales? Are there any harms that we have overlooked or have been given insufficient weight?***

- 1.1 NSPCC Cymru/Wales generally agrees with the direction of the strategy and acknowledges the references made throughout the document to the impact of substance misuse on children and young people in Wales.
- 1.2 ChildLine, a service of the NSPCC, counselled over 165,000 children and young people across the UK between April 2006 and March 2007. Amongst these calls, 488 were counselled by ChildLine for the main problem of alcohol and 1220 were counselled for the main problem of drug abuse. A further 1736 and 1743 went on to mention alcohol and drug abuse, respectively, as an additional problem whilst being counselled for another main problem. These children and young people are most vulnerable and in need of help and support for the issue of substance misuse itself, as misusers themselves or as victims of others substance misusing habits, and also the help and support for any other potential underlying problem.
- 1.3 We believe that children and young people in Wales who are currently misusing substances are children first and foremost. Intervention around prevention and treatment must ensure that the appropriate approach is taken and that an examination of the reasons for the behaviour ought to be made. In order to safeguard the wellbeing of those children and young people who are currently misusing substances, professionals cutting across statutory and voluntary sectors must address this potential issue.
- 1.4 We would also like to highlight the need for the Welsh Assembly Government to be as flexible as possible in their approach to this policy area. Patterns of substance misuse will inevitably change within the

lifetime of this strategy, and this strategy will therefore potentially need reviewing at set intervals.

- 1.5 The forthcoming implementation guidance must also be flexible to possible future change. Currently, however, any implementation guidance must ensure a needs-led approach by involving those who may be directly or indirectly affected by the strategy itself.
2. ***The strategy sets out four aims which underpin the identified priority action areas and the detailed implementation plan (which will be finalised following the consultation). Would you support these aims?***
  - 2.1 NSPCC Cymru/Wales supports in principle the four aims detailed within the strategy. We agree that the identified priority action areas are appropriate and urge the Welsh Assembly Government to ensure that these are not only reflected within the forthcoming implementation plan, but also in practice once published.
  - 2.2 We would also urge the Welsh Assembly Government to ensure that those delivering this strategy are fully resourced and supported in their responsibility. This additional support should be continually mapped and consulted upon so that the aims of the strategy can be reflected in practice.
  - 2.3 We also feel it may be worth highlighting within the strategy that the four aims underpinning the action areas all inter-relate. This integrated approach, especially in relation to support for both individuals and their immediate family members, will help ensure that services work alongside each other and understand their responsibilities in maintaining links between such services.
- 3.0 ***There are four priority action areas set out in the Strategy, are these the right ones and are there any others that you think should be included?***
  - 3.1 NSPCC Cymru/Wales believes that the four priority action areas appropriately cover the areas which need specific focus initially. We would refer to our issues to question 2 and to the response below which relate to the action areas specifically.

***In relation to the prevention action area:***

4. ***Do you believe that we have highlighted the right priorities and proposed action?***
  - 4.1 NSPCC Cymru/Wales agrees that educating and informing children, young people and adults of the damage caused by substance misuse will go some way to help them resist, reduce or delay their misuse.

- 4.2 We agree with the principle that individuals must take responsibility for their overall consumption, however, service provision must be in place in order to help and support those who need to break their habit of substance misuse. Also, such behaviour must not be dealt with solely and without considering the reasons behind the misuse. Such issues, if appropriate, must also be identified and addressed sensitively.
- 4.3 ChildLine, a service provided by the NSPCC, produced a series of reports on issues facing children and young people today. As a result of a significant number of calls, an 'Alcohol and teenage sexual activity' casenote was produced in 2006. One of its key points was that young people in the UK live in a world where alcohol, drugs and sex are commonplace but many of those young people are not given the information they need to navigate that world safely. We therefore believe that drugs and alcohol education for children and young people needs to be sufficiently sophisticated to match their own awareness. Materials need to be up-to-date and accessible in terms of language, learning difficulties and cultural appropriateness.
- 4.4 We agree that prevention initiatives need to be delivered in a range of settings which best accommodate children and young people. School-based programmes could meet the needs of many substance misusers, and in addition to linking in with the school-based counselling strategy as identified, such programmes must be fully considered in relation to responsibility and role. Those responsible for delivery will need to hold the knowledge and confidence to deliver these messages. Such initiatives must also be fully resourced if they are to succeed in practice.
- 4.5 In relation to school-based programmes, links must be made to the current PSE Framework. We believe that a more robust and prescriptive model should be explored. Ongoing support for schools should also be made available so that schools have access to expertise and the knowledge and ability to signpost on when appropriate.
- 4.6 We acknowledge the reference made to children and young people who are not in education, employment or training (NEET). We urge the Welsh Assembly Government to re-engage with these hard to reach and potentially vulnerable young people and ensure that prevention initiatives also meet their needs. We look forward to having sight of the forthcoming NEET Strategy.
- 4.7 We would also urge the Welsh Assembly Government to consider the particular needs of looked after children within the strategy. We believe these children and young people can often become very vulnerable young people and could therefore, potentially need help to resist and reduce substance misuse.

- 4.8 We agree in principle, with the planned development of a substance misuse education steering group on a national level. We await details of this group and hope that the forthcoming implementation plan will appropriately include the need to work alongside other professionals. We believe that responding appropriately and adequately to young people's alcohol and substance misuse requires collaboration and co-operation across a wide range of agencies. A holistic approach is vital at all levels, as young people's problems tend to cross professional boundaries.
- 4.9 At a local and regional level, we agree that partners will need to identify the delivery needs of this strategy are included within their Children and Young People Plans. This further requirement must be made with sufficient support and clear roles and responsibilities. For example, clear links must be made between local Children and Young People Partnerships and the substance misuse education steering group. Relevant agencies need to develop ways of effective information sharing so that professionals can obtain accurate, local information about young people with substance misuse needs. At the same time, they must ensure that this maintains a balance with securing the confidentiality and privacy of children and young people.
- 4.10 Children and young people are affected by substance misuse not only as misusers themselves but as victims of the effect parental misuse can potentially have. We believe the issues mentioned above (4.1-4.6) must be provided for children and young people in either situation.

***In relation to the supporting substance misusers action area:***

***5. Do you feel that there are any major gaps or impediments not identified in the strategy in terms of the availability of services across Wales?***

- 5.1 NSPCC Cymru/Wales agrees with aim here to address the provision of support for substance misusers. We would advocate a holistic approach to treatment services and urge the Welsh Assembly Government to ensure that a needs-led rather than a medical model, as we have experienced around the provision of Child and Adolescent Mental Health Services (CAMHS), is put in place.
- 5.2 We are encouraged by the commitment to prioritise children and young people amongst others. However, we would like to take this opportunity to highlight the fact that treatment programmes for substance misusers will need to be designed separately for children and young people and for adults. However, a needs-led approach here will identify this and we therefore encourage the Welsh Assembly Government to ensure that the specific needs and welfare of children and young people accessing substance misuse treatment services are appropriately identified and safeguarded. This issue must be taken on board in relation to the substance misuse assessment toolkit

mentioned within the strategy. We look forward to seeing its forthcoming details.

- 5.3 We are also encouraged by the impending development of a children and young people's module of the substance misuse treatment framework for Wales. We urge the Welsh Assembly Government to ensure that this is coherent and comprehensive, and also involves children and young people themselves in its design and delivery.
- 5.4 We agree in principle with the proposed introduction of an all Wales maternity record which includes asking questions to expectant mothers the areas of substance and domestic abuse. Both issues are of significant importance and we are encouraged with the potential positive impact this could have. We would urge the Welsh Assembly Government to consider the learning from the current Domestic Abuse Pathway.
- 5.5 We agree and are encouraged by the particular initiatives set out within the strategy to meet the particular support needs of offenders both young and adult. We would highlight here that in relation to adult offenders, professionals must be aware of and recognise any parental responsibility. Service provision and treatment must therefore meet the potential safeguarding needs of the offender's children and family members. Roles, responsibilities and referral options must be clear in such situations.
- 5.6 We also agree with the importance of wrap around services detailed within the strategy. However, we would like some clarification that such provision will be considered and become available to all substance misusers, including children and young people. We would also advocate that the development of a Continual Personal Development Opportunities module as part of the Substance Misuse Treatment Framework must be appropriately applied to children and young people. We believe that Substance Misuse Regional Advisory Teams (SMARTs), through participation and consultation with young offenders, will ensure that a more effective module and intervention initiatives are developed.
- 5.7 Again, in relation to the point made at 1.3, we are encouraged by the explicit reference to the importance of specialist substance misuse treatment services for young people linking in more effectively with other local children services. Moreover, relevant agencies need to develop ways of effective information sharing so that professionals can obtain accurate, local information about young people with substance misuse needs. At the same time, they must ensure that this maintains a balance with securing the confidentiality and privacy of children and young people.
- 5.8 Another issue we would like to highlight here would be the need to avoid a predominantly medical model when measuring and monitoring

treatment quality and outcomes. Despite the clinical governance role of Local Health Boards (LHBs) and Healthcare Commission Wales (HCW), we would urge the Welsh Assembly Government to ensure a holistic approach is taken and that both bodies involve all appropriate agencies.

***In relation to the supporting families action area:***

- 6.0 NSPCC Cymru/Wales acknowledges the particular and substantial reference made to the impact substance misuse can have on immediate family members as a consequence of a parent, partner or child's misusing behaviour.
- 6.1 We are encouraged by the links highlighted between this strategy and others, including the Child Poverty and Domestic Abuse Strategies. This reference must be applied in practice and must run similarly through the forthcoming implementation plan.
- 6.2 We are very much encouraged by the identification of the need to meet the needs of vulnerable families from a whole family approach, with different services working together. Integrated service provision for the individual and their family members, if put into practice, will help ensure seamless delivery of treatment services and avoid multiple assessments for all involved. We also believe that such an approach will help sustain achievements and support a family-based approach to recovery.
- 6.3 We believe that the intention to develop an integrated family support tool to assist local authorities and their partners could potentially be a positive step forward. We look forward to having sight of this as it develops and would urge the Welsh Assembly Government to ensure that it includes safeguarding training.
- 6.4 We provide a Family Support Service across North Wales, and in particular rural areas. Our service works with families who are at risk, also who are witnessing or living with domestic abuse. Our service looks at ways relationships can be re-framed within families so that children and young people are safe and have the opportunity to reach their full potential. Amongst many other areas, our service also supports families who have substance misuse issues. We would be happy to be in consultation with the Welsh Assembly Government to inform them of our experience here and to share good practice.
- 6.5 Also in relation to the proposed integrated family support tool, the NSPCC, on a UK-wide basis, has recently produced two training and consultancy resources which aim to increase the capacity of organisations who work with children and young people to identify and respond to the needs of children living with parents who misuse substances. The resources, namely 'Seeing and Hearing the Child' and 'Children's Voices', have been produced for a multi-agency

audience but can also be used to complement materials used in single-agency safeguarding training. They will meet the needs of a range of professionals across children's social care, health and education, as well as those engaged in adult services where substance misuse is an issue. We believe such resources ought to be shared amongst professionals in order to aid their roles and responsibilities around this subject area. More information can be accessed via the following link: [www.nspcc.org.uk/seehear](http://www.nspcc.org.uk/seehear). We would welcome the opportunity to meet with Assembly Officials to discuss how this development could help support this strategy within Wales.

- 6.6 We are encouraged by the identification of young carers and we hope that the forthcoming implementation plan will again reflect this and ensure that professionals working with adults where potential substance misuse is a problem are alert to the possibility of children and young people fulfilling a caring role.
- 6.7 In relation to supporting parents and carers, we hope that the support made available to them around advice, guidance and counselling, also includes the support they need to continue their role once the individual within their family has completed their treatment programme. Without ensuring this is in place, a sustainable recovery process will be hard to maintain.
- 6.8 We also agree with the links identified within the strategy between domestic abuse and substance misuse services. Implementation guidance must reflect roles and responsibilities clearly and protocols between both must be drawn up.

***In relation to supporting the delivery of the strategy:***

- 7.0 NSPCC Cymru/Wales welcomes the details given around the delivery arrangements and how this will be monitored at national, regional and local levels. We believe a National Substance Misuse Strategy Implementation Board will help oversee the delivery of the strategy. We hope that any proposals to establish such a group will be taken forward positively and seek to engage with stakeholders from across this area of work. We have been disappointed at the apparent failure of a similar group set under the CAMHS strategy in 2001 to reach out to agencies working in the field and provide leadership.
- 7.1 We believe that delivery arrangements must be clear and roles and responsibilities must reflect the capacity of agencies to comply. Local plans must reflect the shared opinions of all relevant stakeholders and must hold weight amongst all involved.
- 7.2 We also believe that all workforce development plans must consider the inclusion of safeguarding training across all disciplines and appropriately take a multi-agency approach to responsibilities around substance misuse. Developments could also gain knowledge for the

NSPCC's recent training and consultancy resources mention earlier in this response.

- 7.3 We also acknowledge the Welsh Assembly Government's financial commitment to the strategy and hope that this will be continually reviewed as appropriate.

NSPCC Cymru/Wales welcomes the opportunity to respond to this consultation and hopes that the Welsh Assembly Government will take into account the issues we have addressed above. We would welcome feedback on they intend to take forward these points and would be happy to meet with representatives to discuss this.

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