

NSPCC CYMRU/WALES

RESPONSE TO:

THE WELSH ASSEMBLY GOVERNMENT'S CONSULTATION ON CHILDREN AND YOUNG PEOPLE'S PLANS INTERIM GUIDANCE 2011-14

NSPCC Cymru/Wales
Diane Englehardt House
Treglown Court
Dowlais Road
Cardiff
CF24 5LQ
Tel: 0844 892 0290
Email: Vivienne.laing@nspcc.org.uk
September 2010



1. Introduction and overview

1.1 The NSPCC aims to end cruelty to children in the UK over future Generations. In pursuit of our vision, we will:

- Create and deliver services for children which are innovative, distinctive and demonstrate how to enhance child protection most effectively.
- Provide advice and support to ensure that every child is listened to and protected.
- Provide advice and support for adults and professionals concerned about a child and if necessary take action to protect the child.
- Work with organisations which work with children to ensure they effectively protect children and challenge those who do not.
- Campaign for changes to legislation, policy and practice to ensure they best protect children.
- Persuade everyone to take personal responsibility for preventing cruelty to children.
- Inform and educate the public to change behaviours and attitudes to protect children.

1.2 NSPCC Cymru/Wales welcomes the opportunity to respond to this consultation on the Interim Guidance for Children & Young People's Plans (C&YP Plan) 2011-14. We welcome the restatement of the Welsh Assembly Government's commitment to the United Nations Convention on the Rights of the Child (UNCRC) and the encouragement to local authorities and their partners to use the UNCRC as a framework for the development of their plans.

1.3 The C&YP Plan that were produced for 2008-11 were very varied in length, clarity and format. We welcome the explicit statement that makes clear that "C&YP Plan should be strategic, concise documents supported by operational plans", and that the "C&YP Plan will need to be clear about the priorities in their local area" and that "C&YP Plan should include a clear, concise articulation of those priorities". However, it would be helpful if it was confirmed that the content of the plans is as described in Chapter 3 of Shared Plans for better Outcomes.

1.4 We are disappointed that the outcomes measures framework that was to be developed and integrated into the CY&PP has been delayed; we feel that indicators and target setting should be part of the strategic planning process and that the development of C&YP Plan will be weakened without clarity around outcome measures.

1.5 We welcome that the local authority and partners can fulfil their child poverty duty by including its child poverty strategy in the C&YP Plan and

that measuring progress against the strategic indicators will be contained in the C&YP Plan and annual review. However, we are disappointed at the lack of acknowledgement of the known association between poverty and some forms of maltreatment. Research shows that children living in poverty are at greater risk of neglect, maltreatment and abuse¹. We urge the Welsh Assembly Government to acknowledge the relationship between poverty and child abuse, and that tackling one will have a positive effect on the other.

- 1.6 NSPCC Cymru/Wales agrees that this guidance will achieve better alignment between the C&YP Plans, Health Social Care and Wellbeing Strategies and Child Poverty Strategy. However, the guidance does not make clear the relationship and linkages with Local Safeguarding Children Boards and this needs to be addressed. Additionally, NPSCC Cymru/Wales recommends that the duties to safeguard and promote the welfare of children under Section 28 of the Children Act 2004 are reinforced in this interim guidance. Plans should make clear roles and responsibilities for safeguarding and child protection and that workforce planning should include ensuring all staff are aware of their safeguarding responsibilities.

¹ NSPCC Child Protection Research Briefing 'Poverty and Child Maltreatment' April 2008

Question 1:

Is the guidance clear or what needs to be achieved through the C&YP Plan, and if not what needs to be done to ensure it is?

As stated in 1.2 above we welcome the Welsh Assembly Government's commitment to the UNCRC and feel that this interim planning guidance does achieve better alignment with the Health Social Care and Wellbeing Strategy (HSCWS) guidance and better integration of the Child Poverty Strategy. It does make clear that plans should be strategic and concise, clearly articulate priorities and be backed up by operational plans. That arrangements in respect of needs analysis, service profiling, consultation and review set out in 'Shared Planning for Better Outcomes' apply in the next planning round. However, this interim guidance does not make clear if other aspects of 'Shared Planning for Better Outcomes' have been superseded. It would be particularly welcome if the Interim Guidance confirmed that the Content and Format of the C&YP Plans is as described in Chapter 3 of 'Shared Planning for Better Outcomes'. Additionally, it is not clear if the Planning Principles in Chapter 4 replace or are additional to the principles underlying in 'Shared Planning for Better Outcomes' and any linkages between the principles is unclear. We would also recommend that the relationship between Integrated Family Support Teams and the C&YP Partnerships is made clear in the guidance.

Section 28 of the Children Act 2004 places a duty on people and bodies to safeguard and promote the welfare of children and 'Safeguarding Children: Working Together Under the Children Act 2004' is the guidance for discharging these duties. NSPCC Cymru/Wales is disappointed that safeguarding duties are not reinforced in this interim guidance; safeguarding is a responsibility of all people working with and organisations providing a service to children and young people. CSSIW² conclude that there is an "imbalance in how organisations and professionals discharge their responsibilities in relation to safeguarding and promoting the welfare of children, with too much reliance and expectation being placed on local authority social services".

NSPCC Cymru/Wales feels that this guidance provides an excellent opportunity to restate the duties to safeguard and promote the welfare of children under Section 28 of the Children Act on all members of the C&YP Partnership. We feel that C&YP Plans should include strategic statements about how safeguarding duties are discharged, the relationships and linkages with LSCBs and makes clear the different roles and responsibilities in relation to safeguarding and child protection between the C&YP Partnership and the LSCB.

² CSSIW Safeguarding and Protecting Children in Wales. The review of Local Authority Social Services and Local Safeguarding Children Boards – October 2009.

Question 2:

Is the relationship with other plans and strategies clear, and if not, what needs to be done to ensure it is?

NSPCC Cymru/Wales feels that this Interim Guidance for C&YP Plans complementing Stronger Partnerships for Better Outcomes and Shared Planning for Better Outcome, is much better aligned with the Draft Health Social Care and Wellbeing Strategy guidance. Better alignment is demonstrated with common planning principles, plan publication dates and simultaneous consultation periods. The Assembly Government's Child Poverty Strategy is also successfully integrated into this Interim Guidance.

NSPCC Cymru/Wales agrees that the five overarching plans/strategies should be linked and cross-refer to one another. We feel that there should be a hierarchy of plans with the Community Strategy being the most strategic document that informs and sets the strategic direction of the other four plans. We also feel that the Local Service Board should be resolving differences about how the different plans inter-relate, identifying overlaps and determining which Plans/Partnerships deal with different aspects of the overlapping issues. We also recommend that these overlaps are more clearly identified in the guidance so that Local Service Boards actually consider and resolve duplication issues. Areas of concern for the NSPCC are domestic violence and parents who have mental health or substance misuse problems. Strategic planning of services for these issues span the HSC&WBP, CSP, C&YP Plans and LSCBs. We would recommend that where Local Service Boards have achieved clarity of role, responsibilities and linkage between the Plans/Partnerships that is described in good practice boxes within the guidance.

NSPCC Cymru/Wales agrees that the relationship between the Local Safeguarding Children Board (LSCB) and the Children and Young People's Partnerships is "crucial". However, there is insufficient detail included in the guidance to make clear the overlaps and make clear which Partnership has responsibility for what. CSSIW state that from the outset, there has been a lack of clarity about the scope of the LSCB's responsibilities in relation to safeguarding. There is a substantial overlap between LSCB's and the responsibilities for the C&YP Partnerships to plan under Core Aims 3 and 6. In some areas LSCBs have focused on child protection, leaving elements of the wider safeguarding agenda to be the responsibility of the C&YP Partnership and Community Safety Partnership. In other areas LSCBs have focused on safeguarding which substantially overlaps with other partnerships. There is a confusing array of different arrangements but most worrying are areas where there has been little discussion about the overlaps to clarify roles, responsibilities and how different Partnerships/Plans relate to each other. This needs to be addressed and clarity of responsibilities between the different partnerships and how they relate to the LSCBs is needed.

Question 3:

In particular, is the guidance for the Health, Social Care and Well-Being Strategies for the period 2010/11 to 2012/13 and for the Children and Young People's Plan sufficiently aligned so as to minimise the burden on local bodies while maximising the local impact of the resulting plans?

See above.

Question 4:

What is your view on whether we need to have all of the existing local partnerships and whether the existing structure of partnerships is fit for purpose?

NSPCC Cymru/Wales feel that there should be no further change to local partnership structures at present and that simultaneous timings and enhanced guidance should improve alignment and plan contents. As described above, clarity of roles and linkages need to be addressed at a local level and so we feel this needs strengthening in the guidance and in particular in relation to LSCBs.

Question 5:

We have asked some of the specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

NSPCC Cymru/Wales recommends that the Welsh Assembly Government considers making reference to specific groups of vulnerable and disadvantaged children and young people. The Child Poverty Strategy includes a chapter on the groups most vulnerable to poverty and 'Shared Planning for Better Outcomes' includes the principle of giving priority to those in greatest need. The Carers Strategies (Wales) Measure will expect a local Carers Strategy to be produced which will include specific planning and service delivery for Young Carers. In NSPCC Cymru/Wales we would recommend that Looked After Children whose outcomes are significantly poorer than other children, are also treated as a specifically vulnerable group and that all agencies plan and co-ordinate their services and activities to achieve improved outcomes for this group of children and young people.