

NSPCC Cymru/Wales

Response to:
**Consultation on the revision of the Healthcare
Standards for Wales**

February 2010

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About us:

The National Society for the Prevention of Cruelty to Children (NSPCC) is the UK's leading charity specialising in child protection and the prevention of cruelty to children. The NSPCC's purpose is to end cruelty to children. 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.

The NSPCC exists to end cruelty to children through a range of activities designed:

- to help children who have suffered abuse overcome the effects of such harm;
- to prevent children from suffering abuse;
- to prevent children from suffering significant harm as a result of ill-treatment;
- to help children who are at risk of such harm; and
- to work to protect children from further harm.

The NSPCC has more than 180 teams and projects throughout Wales, England and Northern Ireland. Their work includes:

- family support, assessment, counselling and therapy to children and families experiencing abuse;
- investigations into allegations of child abuse; and
- work within schools and other youth organisations to provide a voice for children and advocate their rights.

Since February 2006 NSPCC has also delivered the ChildLine service, the UK's free, 24-hour, confidential helpline for children and young people.

Introduction

NSPCC Cymru/Wales welcomes the opportunity to respond to this consultation on the revision of the Healthcare Standards for Wales.

We have chosen to respond by highlighting our main areas of concern and to offer some guidance on how we believe the revised set of standards could more adequately reflect the rights and the needs of children and young people in Wales. We would be happy to meet with the relevant Officials to provide more information about any of our points. Please do let us know if this would help the consultation process.

General comments

NSPCC Cymru/Wales believes that a common framework of healthcare standards could help support the National Health Service (NHS) and partner organisations to provide effective, timely and quality services across healthcare settings throughout Wales.

ChildLine, a service provided by the NSPCC, received over 700,000 calls from children and young people between April 2008 and March 2009. In addition to this, over 50,000 online counselling interactions were also handled in the same period. From this data, we understand that 3,821 children and young people called ChildLine to talk about a health-related problem. Based on the number of calls we received, health featured as a top 10 problem for children and young people calling the service. This is clearly a significant area to which some children and young people have a view and their experiences are placing them in need of further support.

We believe that the standards are a strong indicator that the Welsh Assembly Government is committed to ensuring that the effectiveness and quality of healthcare services are given equal standing amongst other organisational pulls, including finance. We commend the Welsh Assembly Government on this. However, we are concerned that the standards are not as evident in practice as we would all hope.

NSPCC Cymru/Wales has limited experience of the current healthcare standards in practice and we believe this to also be a reflection of the experience that the children, young people and families who access our services also have. In considering this, we feel it would be a useful exercise via the responses submitted to this consultation for the Welsh Assembly Government to map how far respondents have an understanding and awareness of the current healthcare standards and analyse this information. It could also prove to be a useful exercise in identifying how accessible these standards are and how far respondents are assessing for themselves how far healthcare services are meeting them.

We urge the Welsh Assembly Government to map the current level of awareness and understanding of the healthcare standards amongst all citizens, including children and young people, with a view to taking the learning and applying this to any future awareness-raising opportunities.

Having considered the proposals for their revision, we believe that the standards are broadly useful and if fully supported and implemented in practice, will go some way to ensure that healthcare services are of a good quality and consistently delivered across Wales. Despite this, there are a few areas outlined below that we would like to draw to the attention of the Welsh Assembly Government.

United Nations Convention on the Rights of the Child:

We are disappointed not to see reference to the United Nations Convention on the Rights of the Child (UNCRC) within the proposals. We believe that there is considerable value in exploring the option of using the UNCRC as the framework for all statutory and non-statutory sectors providing services for children and young people in Wales. This could ensure that a priority is given to making the rights of the child a reality in Wales and that all aspects of service provision for children and young people, from design to delivery, are of a consistent standard in Wales. We believe that this may also help align professional standards and subsequently enhance the experience of the children and young people in receipt of such services.

We urge the Welsh Assembly Government in partnership with other relevant organisations across the statutory sector in Wales to explore the potential of cross-referencing service standards under the framework of the UNCRC to ensure that children and young people experience consistency when assessing services and their rights realised.

Aside from the above, the Welsh Assembly Government has made considerable inroads in making the rights of children and young people a reality in Wales. They should be commended in their efforts here although there is still some way to go before all children and young people across Wales confidently access all of their rights, including those within health. We are unclear from the proposals how the revised healthcare standards will impact on children and young people in their experiences of accessing and receiving healthcare services across Wales. In this respect, we believe that it is the duty of the Welsh Assembly Government to ensure that children and young people are aware of the revised healthcare standards and understand how they should be translated in practice.

We urge the Welsh Assembly Government to ensure that children and young people are made aware of the revised standards and what they should expect from healthcare organisations. This should be in an accessible and age-appropriate format that empowers the child or young person to assess for themselves how far their experiences correspond.

NSPCC Cymru/Wales believes that the Welsh Assembly Government must ensure that children and young people are not only made aware of the standards but form part of the wider involvement agenda, laid out clearly within the UNCRC framework. Children and young people must be empowered to participate safely and appropriately in the relevant service design and planning decision-making processes. This may go some way to ensure that children and young people are recipients of the Welsh Assembly Government's commitment to "citizen-centred governance principles and values for public service organisations in Wales". In this respect, we also believe that children and young people should have access to the relevant advocacy support if they wish. From our experience of advocacy provision in health, it is often geared at parents and carers making a complaint about services received by their child rather than children themselves having access to an advocate to ensure their own wishes and feelings are represented.

We urge the Welsh Assembly Government to ensure that children and young people are involved appropriately and safely in the relevant decision-making processes of healthcare organisations. Access to an independent advocate must also be available within healthcare settings so that children and young people themselves are able to highlight their particular wishes and feelings in a supported environment.

Likewise, we also believe that healthcare professionals must have an awareness and understanding of the UNCRC so that they are fully equipped to provide healthcare services reflective of children's rights.

We urge the Welsh Assembly Government, as part of their 5 year action plan to implement the UNCRC and ensure that professionals working in healthcare organisations have a good awareness and understanding of the UNCRC and are fully supported in making the rights of children and young people a reality in health.

Responsibility:

Despite the expectation that the standards will continue to be used and met "by those who plan, design and deliver services across all types of healthcare settings for citizens of Wales" (pg5), we are disappointed that the proposals lack detail here. We believe that all professionals working in healthcare settings across Wales ought to have an understanding of the standards and access to support in their implementation. However, we also believe that there needs to be clear lines of accountability and are concerned with the lack of clarity around this.

We urge the Welsh Assembly Government to provide details of who currently holds the responsibility for implementing the standards across all healthcare organisations in Wales and whether or not this will change as part of the revision process.

Resources:

On this note, we are encouraged that there will be a stronger focus on embedding the standards within services. We believe that in order to evidence the value and usefulness of the standards and an increase in quality consistently across Wales, a stronger focus on implementation and of embedding the standards in daily practice is essential. In order to achieve this, a strong commitment to invest the necessary resources is vital.

NSPCC Cymru/Wales would urge the Welsh Assembly Government to commit the necessary resources to fully support all professionals responsible for implementing the healthcare standards across Wales. There must also be an assurance from healthcare providers that this investment will not fall victim to budgetary cuts.

Despite the limited clarity on financial investment, we are encouraged to see that there will be a level of support to professionals responsible for the implementation of the standards via the NHS Wales Governance e-manual website. We believe this to be an important part of developing the standards. This support must be easy to use, understandable and regularly reviewed so that it continues to serve its purpose and provide professionals with the relevant assistance and information.

We would urge the Welsh Assembly Government to consult with relevant organisations to ensure comprehensive support is provided to professionals via the NHS Wales Governance e-manual tool. We would be particularly keen to work with the relevant healthcare providers to ensure that Standard 10 – Safeguarding contains the key features necessary to ensure this is fully implementation across the NHS.

Alignment:

As part of embedding the standards within services, it is intended that their revision will enhance their alignment to other professional standards. We would like to highlight the potential link to the National Service Framework for Children, Young People and Maternity Services (NSF). This NSF (in addition to forming part of a wider series) sets out the quality of services that children, young people and their families have a right to expect and receive. We believe there is a vital link to be made and would welcome clarity from the Welsh Assembly Government on how this will be made both in terms of aligning policy and practice. From our perspective, the NSF has proved to be a useful framework to reflect the Welsh Assembly Government's commitment to children and young people in Wales, yet there remain many issues with its implementation. We are aware that there is a review currently underway and believe that any learning from this must be taken onboard within the final draft of the healthcare standards.

We urge the Welsh Assembly Government to clarify how the revised healthcare standards for Wales will compliment the existing NSF for Children, Young People and Maternity services in policy and practice. The Welsh Assembly Government must also ensure that any relevant learning should be taken from their current review of the NSF and that this is sufficiently incorporated, as appropriate, within the final draft of the healthcare standards.

Assessment and Inspection:

We are in full agreement that Healthcare Inspectorate Wales (HIW) are tasked and equipped sufficiently to assess compliance and progress against the standards. We are aware from the independent review undertaken by Quality Improvement Scotland¹ that at the time of the review, there was wide-spread support amongst healthcare organisations for the standards and that they were applicable to both commissioners and service providers. However, it was also noted that despite this support, a culture change would be needed to ensure that they are embedded into organisations' core business and not seen as an additional burden. NSPCC Cymru/Wales was disappointed not to see any reference to this within the consultation and we are therefore unclear as to how the revised standards will address this finding. As the standards and any subsequent guidance will be of non-statutory status, we are concerned that the proposals provide no clarity around the duty of compliance and the

¹ Quality Improvement Scotland (2008) Independent Review of the Effectiveness of Healthcare Inspectorate Wales' (HIW) Assessment Against Healthcare Standards: 2006/07, Edinburgh.

appropriate penalty for any healthcare organisation who fails to comply. We believe that these issues must be clearly addressed at the outset.

We urge the Welsh Assembly Government to confirm the status of the healthcare standards and ensure that rules of compliance and penalty are established at the outset so that healthcare organisations are fully aware of their duties and that this may ensure a more consistent approach across Wales.

The revised standards:

NSPCC Cymru/Wales will list below the standards to which we feel we have most experience of and/or have an issue to highlight. Again, we are happy to discuss any of the point raised as part of our response with the relevant Officials to provide further information.

Health Improvement and Promotion:

We are encouraged by the detail contained under this standard to ensure a needs-led approach to service development and working in partnership (amongst others) but would like to highlight here the wider role to be played by citizens, including children and young people in Wales. We believe that in order for health improvement and promotional messages and initiatives to be fully endorsed by all citizens, healthcare organisations should involve them in the design, delivery and evaluation stages of such development.

We would urge the Welsh Assembly Government to ensure that they reflect the wider inclusion agenda here and further enable services to develop according to the needs of citizens, rather than being imposed upon them.

We also believe that the needs assessment process and the involvement of citizens in this, will enable good evaluation of current levels of provision and improve budget allocations at both a national and local level.

We urge the Welsh Assembly Government to ensure that healthcare organisations, alongside key partners, map service provision in their areas and make this information accessible to other professionals as well as service users themselves. This should then form part of the evaluation and ongoing development processes.

Citizen engagement and involvement:

We are encouraged by this as a standard and hope that the definition of citizen will ensure the inclusion of children and young people. As we have previously highlighted, children and young people must be empowered to participate safely and appropriately in the relevant service design and planning decision-making processes. In this respect, we also believe that children and young people should have access to the relevant advocacy support if they wish.

We urge the Welsh Assembly Government to ensure that citizen engagement and involvement includes children and young people and that the necessary support and resource required to enable this in practice will be allocated appropriately.

We also urge the Welsh Assembly Government to ensure that any involvement of children and young people in any stage of service development and delivery is undertaken in a safe environment and that the appropriately trained and vetted staff are equipped with the relevant materials to enhance any involvement practice. Staff must also be aware of the relevant safeguarding policies and procedures and understand their duty if a disclosure occurs.

Care planning and provision:

We welcome the acknowledgement that other organisations, including the third sector, play an important part in meeting the needs of patients and service users in the provision of all aspects of care and treatment. We would encourage the Welsh Assembly Government to ensure that healthcare organisations work closely with other service providers in order to ensure that a child, young person or their family are able to access quality services in a timely manner.

We urge the Welsh Assembly Government to encourage and support healthcare organisations to develop wider relationships with partner organisations. This must

include the development of clear, though unbureaucratic, procedures to ensure a smooth referral process and good lines of communication when services are unable to be provided 'in-house'.

We would also encourage the Welsh Assembly Government to ensure that through this standard, healthcare organisations and services are not only medically driven. There is a clear need for services to develop holistic practices where the patient is placed at the centre and their needs are appropriately met by the most suitable provider.

We urge the Welsh Assembly Government to ensure that through establishing good relationships with partner organisations, healthcare organisations make a wider variety of services to ensure a more holistic approach to patients needs can be developed and maintained.

Patient information and Consent:

We agree that appropriate information about the healthcare received by all patients should be available in a timely manner. Children and young people have a right to this information also, as laid out within Articles 13 (freedom of expression) and 17 (access to information and material) of the UNCRC.

We urge the Welsh Assembly Government to ensure that healthcare organisations comply with the UNCRC and provide the appropriate information to children and young people that meets their specific needs and is age-appropriate.

We also believe it is crucial that children, young people and their families are given the opportunity to discuss and agree the options available to them in relation to their care and treatment. Using the UNCRC as a tool, healthcare organisations can ensure that both Articles 3 (best interests of the child) and Article 12 (right to express their views) can work well together. There are many useful tools and resources available to organisations to ensure the rights of children and young people in relation to the healthcare they receive are made a reality.

We urge the Welsh Assembly Government to ensure that healthcare organisations provide children, young people and their families the opportunity to discuss and agree the care and support they receive. Independent advocacy support for the child or young person who may need this should also be made available at the outset.

Safeguarding:

NSPCC Cymru/Wales believes that healthcare professionals play a key role in protecting children and young people from abuse in Wales. As we have previously raised with the Welsh Assembly Government, we strongly believe that more consideration needs to be given to how the child protection duties on the NHS will be delivered within the new NHS structures. Despite the fact that we are encouraged by the revision of this standard, we are still unclear on a number of wider key issues.

We urge the Welsh Assembly Government to provide clarity on the following:

- **Confirm that child protection will continue to be a priority within the new NHS in Wales**
- **Clarify the role of the proposed new unified public health service in relation to child protection**
- **Ensure that there is clear accountability for child protection within all new structures, including lead roles for children and young people**
- **Ensure clear understanding of the roles and duties of designated professionals within the health service**
- **Use the NHS restructure as an opportunity to review the delivery of child protection within the health service in Wales.**

We believe that the inclusion of this standard will help ensure that every healthcare organisation in Wales sets out its arrangements for safeguarding and child protection. We are encouraged that they will then be expected to evidence their own compliance, with further analysis from Healthcare Inspectorate Wales also. We believe that this sends a strong message to healthcare organisations in Wales that priority must be given to the safeguarding

agenda. We commend the Welsh Assembly Government on this and look forward to its continued implementation.

As part of this standard, we believe that healthcare professionals should be provided with ongoing training on child protection issues and receive the appropriate support from colleagues and management to ensure compliance and have the confidence to act on any concern they may have. According to the recent Healthcare Inspectorate Wales (HIW) report following their review into the arrangements for safeguarding and protecting children across the Welsh National Health Service, staff awareness and training was highlighted. HIW report that in their evaluation of the Healthcare Standards self-assessments submitted by Local Health Boards for the 2008/09 financial year, some improvements had been made in raising awareness amongst GP, dental and pharmacy contractors, yet this was less so amongst optometrists. Healthcare organisations must do everything possible to ensure that the safety of the child or young person remains paramount at all times, and that all professionals have a good awareness of child protection issues and the procedures to follow when necessary. We believe that NSPCC Cymru/Wales' Helpline number, 0808 800 5000 should be distributed amongst such staff. This service is available to anyone who is worried or concerned about a child who is suffering abuse or is likely to suffer abuse.

We urge the Welsh Assembly Government to ensure that child protection processes are clear and well understood so that they are fully established in the ethos of healthcare organisations and that a commitment to work to these requirements are not made onerous. Healthcare professionals must also have access to ongoing training on child protection and the appropriate support in practice.

We also urge the Welsh Assembly Government to address all of the recommendations made within HIW's recent report into the safeguarding arrangements across the NHS in Wales, and communicate their proposals in taking forward any learning.

Effective multi-agency and multi-professional working is key to protecting children and young people. There is still no clarity around the relationship between the new unified public health body and the new Local Health Boards on the issue of child protection. This standard or indeed any further guidance on how healthcare organisations are to follow these standards could provide this detail. There needs to be clear lines of accountability both within the new bodies and also between them and other agencies if they are going to continue to facilitate the delivery of the child protection duties of the NHS in Wales.

NSPCC Cymru/Wales strongly recommends that clarity is sought as a matter of urgency on the vital link between this standard for all healthcare organisations and the developments in relation to the lead organisation for child protection within the NHS in Wales.

We also believe that healthcare professionals have a role to play in identifying further vulnerable children and young people. We are aware that bullying can be a considerable issue for children and young people in accessing out-of-school services and believe that with the appropriate training, professionals in direct contact with service users could identify and address such issues. We believe this will further safeguard children and young people against abusive behaviour and enable them to fully engage in the service they are receiving. Children and young people must be given information about ChildLine, a service provided by the NSPCC, when accessing healthcare services. ChildLine can often be the only source of help and support for these young people, calling due to a range of concerns and issues they have. Between April 2008 and March 2009, ChildLine counsellors handled nearly 700,000 calls. In the same period, a total number of 26,134 children and young people were counselled for bullying as their main concern. An additional 5,115 children and young people mentioned bullying as another concern while being counselled by ChildLine. This results in bullying being the main problem leading to children and young people contacting ChildLine.

We urge the Welsh Assembly Government to enable all healthcare professionals, through relevant training and support, to identify children and young people who may be experiencing bullying and to acknowledge the impact this may be having on their engagement with the service. Professionals should also know the appropriate to services to signpost children, young people and their families onto.

Environment:

NSPCC Cymru/Wales believes that the environment to which healthcare services are provided for children, young people and their families is particularly important to help ensure they access services that are safe, flexible to their needs and encourage full engagement. We are encouraged by the inclusion of this standard though we are concerned that the detail reflects only the physical nature of the environment to which services are provided.

In this respect, we are aware that current service provision does not always reflect this standard. Our experience working with Child and Adolescent Mental Health Services (CAMHS) locally is an example of this. We are aware that children and young people are inappropriately placed on adult mental health wards. We strongly believe that this is a breach of the safeguarding duty of the NHS in Wales. We are also aware that HIW, as part of their recent review, report that the suitability of the environment of care is critical.

We urge the Welsh Assembly Government to ensure that the practice of placing children and young people on adult mental health wards is ended.

HIW also highlighted that even when children and young people with mental health problems are looked after on paediatric wards, this can also be detrimental to their care and disruptive to fellow patients. They note that “most inpatient paediatric services have told us that the support they receive from specialist Child and Adolescent Mental Health Services (CAMHS) staff is inadequate often leading to a lack of therapeutic support or treatment during a young person’s stay on the ward” (2009:28).

We urge the Welsh Assembly Government under this ‘environment’ standard to ensure that healthcare professionals are adequately resourced and supported to ensure that age specific facilities are made available across Wales for all specialities.

Again, from our experience working with CAMHS locally, we believe that this standard should reflect more than the physical environment of service provision. We believe that this standard, alongside the ‘care planning and provision’ standard should better reflect the need to ensure accessibility and flexibility of services. We are aware that some CAMHS teams locally can often fail to accommodate the needs of children, young people and their families by providing services at unsuitable locations at unsuitable times. This can often lead families to miss appointments and disengage with services. We are also aware that in these circumstances, CAMHS have often close cases and families return to waiting lists. We believe this threatens the child protection duty of healthcare providers and fails to place the child or young person at the centre of service development.

We urge the Welsh Assembly Government to ensure that through this standard, healthcare organisations recognise the importance of being needs-led and flexible in their approach to service provision so as to empower children, young people and their families to remain engaged with frontline services.

NSPCC Cymru/Wales welcomed for the first time a focussed consultation in August 2009 that identified the need to acknowledge and address the specific and considerable issue of rurality. We are unaware of the developments since this but believe this to be another opportunity to highlight this issue. NSPCC Cymru/Wales has experience of the particular safeguarding needs for children, young people and their families living in rural communities. Child abuse and neglect does not escape these communities and incidences of abuse (including domestic abuse) can often remain hidden and unreported. As previously stated health professionals play a critical role in identifying and protecting children and young people who are experiencing abuse. If services are not accessible there is less chance of these children and young people being in contact with a professional. This standard, in its attempt to be accessible, safe and secure, needs also to recognise the issue of rurality and ensure that healthcare professionals working across Wales are supported to maintain a consistent standard of service.

We urge the Welsh Assembly Government to acknowledge the issue of rurality here and ensure that the necessary steps are taken in meeting the needs of children, young people and their families across the geography of Wales. We strongly believe that in doing so, healthcare professionals need to be supported in their safeguarding role and continually trained in the area of child protection.

Effective team working:

NSPCC Cymru/Wales understands the importance of effective team working, particularly in the area of safeguarding. We can identify all of the detail listed under this standard, however, we are concerned not to see any reference to appropriate information sharing, clear lines of communication, accountability and management. We believe that effective team working should make reference to these important components to avoid situations where vulnerable children and young people are compartmentalised, leading to potential safeguarding concerns.

We believe that in order to ensure effective team working is a consistent standard across Wales, the Welsh Assembly Government must ensure that information sharing protocols, and the importance of communication, accountability and management is included within the final draft. Healthcare professionals, working in teams ought to be supported in their capacity to apply this.

We also believe, as stated under the proposed care planning and provision standard, that other organisations, including the third sector should play a role here. Safeguarding children and young people is everybody's business and it is therefore essential that relationships and referral processes with a wider 'team' should be established and well maintained. A report produced by Care and Social Services Inspectorate Wales (CSSIW) in October 2009 detailed the findings of their review of local authority social services and local safeguarding children boards in safeguarding and protecting in Wales. CSSIW note that the level of co-operation between individual practitioners in social services and other agencies was generally good in protecting children with timely action. However, they subsequently note that individual staff from other agencies:

too often carried responsibility for operational or practice development in isolation from others in their employing organisation. The contribution of the wider local authority, including schools, the police and health services varied across Wales and seemed to depend on local tradition or the attitude of key lead officers. General practitioners have a key role within the primary health service but they were insufficiently engaged in child protection work...The burden of responsibility for administering and coordinating the child protection services was weighted too much towards children's social services².

We urge the Welsh Assembly Government to ensure that healthcare organisations build into their effective team working processes the importance of applying this standard when working alongside other organisations, particularly in the area of safeguarding children and young people.

In addition to the above, we believe that in order to recognise and address the needs of patients, teams of healthcare professionals will need a good skill mix, not only in relation to different health needs but also different age ranges. NSPCC Cymru/Wales hopes that this can be reflected in the make-up of teams and their ability to work well together in meeting the needs of patients.

We urge the Welsh Assembly Government to ensure that teams are fully equipped in terms of skills and when necessary, to ensure healthcare organisations have access to the relevant professionals or other organisations (including the third sector) who can meet the needs of the patient.

Effective Communication:

Despite the acknowledgement of appropriate communication here, we would like to stress this further, particularly when healthcare organisations are communicating with children and young people. We refer the Welsh Assembly Government back to the issue we raised under the 'patient information and consent' standard, and highlight again the right for children and young people to have the relevant information communicated to them about their healthcare in a timely manner.

² CSSIW (2009) Safeguarding and protecting children in Wales: The review of local authority social services and local safeguarding children boards, Cardiff.

Again, we urge the Welsh Assembly Government to ensure that healthcare organisations comply with the UNCRC and provide the appropriate information to children and young people that meets their specific needs and is age-appropriate.

NSPCC Cymru/Wales would like to highlight an issue raised as part of Healthcare Inspectorate Wales' (HIW) report in October 2009 of a review of the safeguarding and protecting children arrangements in place across the Welsh National Health Service. HIW report that some staff are concerned about the effect that breaking patient confidentiality may have on their future relationship with individual patients. We believe that this concern amongst practitioners may impact on their ability to communicate effectively and therefore agree with the recommendation made.

We urge the Welsh Assembly Government to provide greater support and training for all staff working directly with children and young people to enable effective communication and information sharing as appropriate to take place.

We would also like to highlight another issue under this standard. CSSIW (2009) note within their review that referrals received by social services, detailed records that "lacked clear and explicit information about, for example...the health...records of the child"³. This resulted in mostly unsatisfactory collection and analysis of information by the first response and duty teams. CSSIW also note that case conferences mostly happen in a timely way. However, the attendance rate of agencies varied across Wales, with general practitioners or other specialist health practitioners being the "most frequent absences"⁴.

In considering the findings of the CSSIW review, we would urge the Welsh Assembly Government to ensure that healthcare professionals who inform and maintain the healthcare records of children and young people, those who have a duty to attend case conferences and others working in their teams are fully supported to ensure their role in communicating and working together with other agencies and organisations is made possible in practice.

Information Management:

NSPCC Cymru/Wales are encouraged by the inclusion of this standard. We would like to stress again the extreme importance of ensuring the safe management of patient information, especially that of children and young people.

We urge the Welsh Assembly Government to ensure the necessary monitoring procedures are in place to review the information management systems and ensure they are safe.

Conclusion:

Again, NSPCC Cymru/Wales welcomes the opportunity to respond to this consultation on the proposals on the revision of the Healthcare Standards for Wales. We would be happy to discuss any of our points with the relevant Officials.

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³ Ibid:17.

⁴ Ibid:20.