

NSPCC Cymru/Wales

Response to:

Rural Health Planning – Improving Service Delivery Across Wales

August 2009

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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.

1.0 **Introduction**

- 1.1 NSPCC Cymru/Wales welcomes the opportunity to respond to this consultation on the proposed plans for improving the delivery of health services through Rural Health Planning. Health services and professionals within this sector play a crucial role in safeguarding and protecting children and young people. It is particularly important that during this period of structural change within the NHS in Wales that professionals and managers do not lose sight of their safeguarding and protection duties.

2.0 **Main comments**

- 2.1 NSPCC Cymru/Wales welcomes for the first time a focussed consultation that identifies the need to acknowledge and address the specific and considerable issue of rurality. We understand that developments here reflect the Welsh Assembly Government's One Wales commitment and acknowledge the progress being made. However, we are disappointed that the proposals do not reflect the potential for this agenda to be expanded to identify rural issues within all policy areas. We believe it may have been helpful to develop a rural needs assessment, to be used across all statutory services, as part of the One Wales commitment rather than focussing efforts on health only. Children, young people and their families living in rural communities will not only be in contact with the health sector. Therefore, in order to ensure they are appropriately safeguarded, issues of rurality must be acknowledged and addressed in the planning and delivery of all statutory sector professionals and services. We agree with the authors when they state clearly that rural health cannot be considered in isolation and that this "reinforces the need for rural proofing and integrated planning and service delivery" (2009:7). The production of the forthcoming Action Plan may go some way to allow the issue of rurality to be factored into existing, and also at the outset of future, Welsh Assembly Government policy agendas and guidance.

We urge the Welsh Assembly Government to ensure that the integrated approach identified is promoted amongst other policy areas and in practice.

- 2.2 We are concerned that the Action Plan to follow may develop in the same way as other comprehensive strategies have done, reflecting a significant gap between policy and practice. An example of this in our opinion is the Child and Adolescent Mental Health Services (CAMHS) Strategy in Wales. We would urge the Welsh Assembly Government to ensure this will not be the case and that any Action Plan to follow will be an accessible and practical tool for planners and commissioners to identify and address any rural issue or implication anticipated. With the necessary resources committed, issues identified within this consultation regarding rurality can be adequately included in the planning processes of both national and local decision-making.
- 2.3 Many issues faced by children and young people can often be similar to those faced by adults and older persons too. We are disappointed with the particular focus on adults and older persons within the proposals. We are acutely aware that children, young people and their families can often face further barriers to accessing appropriate services, Despite the fact that the Welsh Assembly Government has made positive steps forward in identifying this and placing most of its policy context within the requirements of the United Nations Convention on the Rights of the Child (UNCRC), we are disappointed not to see the inclusion of any reference to the UNCRC, particularly Articles 12 and 24 relating to participation and access to health services (respectively), within the consultation.

We urge the Welsh Assembly Government to address this gap and ensure that the final draft of this guidance references the UNCRC and acknowledges that children and young people have a right to access health care services regardless of their geographical location.

- 2.4 In reflection of this, we were disappointed not to see the inclusion of the relevant recommendations made within the United Nations Committee on the Rights of the Child's Concluding Observations to the UK State Party in October 2008¹:

¹ <http://www2.ohchr.org/english/bodies/crc/docs/AdvanceVersions/CRC.C.GBR.CO.4.pdf>

Health and health services

54. *The Committee is concerned that, despite the State party's efforts to tackle inequalities in access to health services through, inter alia, substantial investments, inequalities remain a problem, as demonstrated by the widening gap in infant mortality between the most and the least well off groups.*

55. The Committee recommends that inequalities in access to health services are addressed through a coordinated approach across all government departments and greater coordination between health policies and those aimed at reducing income inequality and poverty.

We believe it is essential that the Welsh Assembly Government consider the Concluding Observations through the lens of rurality and address the particular barriers faced in accessing health care services.

We believe that rural communities in Wales are particularly vulnerable to the impact of the lack of progress here and that the Welsh Assembly Government must make the relevant changes to address this issue.

- 2.5 NSPCC Cymru/Wales are concerned about the inferences likely to be associated with the continual reference to demographic change within the proposals. We agree that this data should guide planning proposals for statutory services in rural areas though we do not believe that the decisions should wholly be based on this data. A trend of an ageing population with outward migration of young people does not mean that children, young people and their families will be safer or in any less need of protection or access to appropriate statutory services. In line with Article 12 of the UNCRC, we are unaware of any specific consultation made with children, young people and their families directly. This may have gone some way to bring together and understand their particular views and incorporate these within the proposals.

We urge the Welsh Assembly Government to address this concern and ensure that any action plan identifying rural issues does not lose sight of the needs of children, young people and their families living in rural Wales.

- 2.6 In addition to the above, we would like to highlight the particular role of independent advocacy here. We acknowledge the Welsh Assembly Government's aim of providing advocacy for all children and young people and believe that access to independent representation will allow them to express their feelings and experiences without recourse. We strongly believe independent advocacy should be available to all children and young people who access services in all statutory sectors, including health.

We urge the Welsh Assembly Government to include the need to provide Independent Advocacy for all children and young people who wish to use such a service, within any subsequent action plan.

- 2.7 NSPCC Cymru/Wales is aware that some of the key strategies relating to children and young people reflect the Welsh Assembly Government's commitment to ensuring a specific focus of activity for particularly vulnerable groups. We believe that those living in rural communities could be amongst the many groups included here. However, despite this intention, we believe there is sufficient evidence to suggest that such vulnerable children and young people continue to go unsupported by a range of services in Wales. This heightened vulnerability should be met with comprehensive, accessible and tailored services for these children, young people and their families as a priority. An example of which is Child and Adolescent Mental Health Services (CAMHS). In order to further safeguard and provide the appropriate services, issues identified within the consultation around rurality must be acknowledged and addressed.

With this in mind, we urge the Welsh Assembly Government to prioritise a timely, effective and co-ordinated response to the particular needs of the most vulnerable children and young people (including those living in rural

communities) when accessing services such as CAMHS in Wales.

- 2.8 In addition to the above, we believe that any action plan must also reflect the content of the National Service Framework for children, young people and maternity services as well as all 22 Local Authority Single Plans. This, in our opinion, will help enable a more joined-up approach to health service delivery for rural Wales.

We therefore urge the Welsh Assembly Government to co-ordinate any subsequent action plan with these important strategy and guidance documents across Wales.

- 2.9 We also have experience of the particular safeguarding needs for children, young people and their families living in rural communities. Members of all communities must be supported to identify their safeguarding role. Those living in rural areas, it could be argued, need further support here. With many close-knit networks of people living in rural communities, it is vital that they remain a source of support, rather than a further barrier for children, young people and their families in accessing the relevant help. Child abuse and neglect does not escape these communities as we are only too aware 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. For example we know from experience the crucial role that health professionals can sometimes play in identifying domestic abuse and providing victims with support when they are accessing health services. This strategy needs to recognise this role and ensure that health professionals are supported to play their role in safeguarding and protecting children and young people.

We would urge the Welsh Assembly Government to liaise with all Local Safeguarding Children Boards across Wales to help identify the particular needs of rural communities and to ensure they are adequately met and to ensure that this plan recognises the crucial role that health professionals play in safeguarding and protecting children and young people.

- 2.10 NSPCC Cymru/Wales has been able to access the most recent information around the number of children being looked after by local authorities in Wales. Despite the latest figures highlighting the year beginning April 2007- March 2008, we would like to draw the Welsh Assembly Government's attention to the 4,635 children and young people looked after by local authorities in Wales. If we were to use the OECD 1994 definition of rurality, described within the consultation as applicable to not only the nine rural authorities in Wales but also parts of the Valleys and areas in some urban authorities, the majority of children and young people in care would be defined as living in rural communities and may potentially experience barriers to services as a consequence. Whilst we believe strong rural health planning in policy and practice should be realised for all children and young people living in rural communities, we are acutely aware that the issues experienced by some children and young people by the nature of their circumstances and/or stages of their lives, may cause them to become more vulnerable. Children and young people placed within the looked after system are particularly included here.

We would urge the Welsh Assembly Government to acknowledge this and to respond by ensuring that their heightened vulnerability is met with comprehensive, accessible and tailored services for these children, young people and their families as a priority.

- 2.11 NSPCC Cymru/Wales acknowledges the reference made within the consultation to the increase in the number of Welsh speaking children in Wales and believes that this reiterates the clear requirement for services to be needs-led.

We urge the Welsh Assembly Government to ensure that equality of provision reflects the needs of Welsh-speaking children and young people across Wales.

3.0 Conclusion

- 3.1 Again, NSPCC Cymru/Wales welcomes the opportunity to respond to this consultation on the proposed plans for improving the delivery of health services through Rural Health Planning. We hope the points highlighted above will be taken onboard to ensure the forthcoming action plan is as comprehensive and useful as possible and can inform further policy areas with regard to rural issues. We would be happy to discuss any of our points with the relevant Officials.

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