



Department of
**Health, Social Services
and Public Safety**

An Roinn
**Sláinte, Seirbhísí Sóisialta
agus Sábháilteachta Poiblí**

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***Care Matters in
Northern Ireland –
A Bridge to a Better
Future***

Response Document

March 2007

CONSULTATION QUESTIONS

Please respond to the consultation document by e-mail, letter or fax.

Before you submit your response, please read the pages 111-113 of the consultation document on the confidentiality of consultations. The document will give you guidance on the legal position about any information given by you in response to this consultation.

Responses should be sent to:

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Care Matters Consultation

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Responses must be received no later than **15th June 2007**.

(Please tick a box)

I am responding: as an individual on behalf of an organisation

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INDEX TO RESPONSE FORM

WE WOULD WELCOME VIEWS ON ALL ASPECTS OF THE STRATEGY. HOWEVER, IF YOU HAVE A PARTICULAR INTEREST ON ONE AREA AND DO NOT WISH TO COMMENT ON THE WHOLE DOCUMENT, FEEL FREE TO COMPLETE ONLY THOSE SECTIONS OF INTEREST TO YOU.

Chapter 1: Context	Pg. 4
Chapter 2: A Vision for the Future	Pg. 4
Chapter 3: Children on the Edge of Care	Pg.5
Chapter 4: Supporting Families and Protecting Children	Pg. 6 - 8
Chapter 5: Ensuring children are in the right placements and promoting placement stability	Pg. 9 - 12
Chapter 6: Corporate parenting	Pg. 13 - 15
Chapter 7: Education	Pg. 16 - 18
Chapter 8: Life Outside School and Care	Pg. 19 - 21
Chapter 9: Transition to Adulthood	Pg. 22 – 24
Human Rights	Pg. 25
Equality Implications	Pg. 26 – 27
Additional Comments	Pg. 28

Chapter 1: Context

1. **Do you consider that Chapter 1 (Context) successfully identifies the context of care provision in Northern Ireland? (Please tick)**

YES ✓

If you have any further comments, please outline below.

Greater reference to the contribution of the social care workforce and a commitment to its continuing support through agency training and development we consider would have enhanced Chapter 1.

Chapter 2: A Vision for the Future

2. **Chapter 2 identifies two ambitious key goals to underpin Government's vision for the future of care provision in Northern Ireland (para. 14). Do you believe that these are desirable and achievable? (Please tick)**

YES ✓

If you have any further comments, please outline below.

We remain guarded against the setting of a target to reduce the number of children and young people in care by 20%. The risk in setting such a target is that children would either not be brought into care at the right time or would be discharged from care prematurely in order for targets to be met. What matters most is that the children who are in care are there because care is the right place for them to be at a given point in their lives. A working group set up in England under Care Matters looked at this issue in detail and strongly advised against the setting of this type of target. We support the goal to double the proportion of care leavers who are in employment, education or training at age 19.

Chapter 3 Children on the Edge of Care

- 3. Do you consider that Chapter 3 successfully identifies the needs of children on the edge of care? (Please tick)**

YES ✓

Please comment on what you think should be added or removed and state the reasons why.

It may be appropriate to make reference at point 8 to young people who are a danger to themselves as well as those who are a danger to others given the increased numbers of young people attempting or committing suicide.

Chapter 4: Supporting Families and Protecting Children

4. Chapter 4 outlines a range of actions aimed at supporting families and protecting children. Please indicate whether you support the actions in the following areas:

a) Protecting children and young people more effectively by strengthening safeguarding arrangements (at para. 5);

YES ✓

If you have any further comments, please outline below.

We agree that safeguarding arrangements should be as robust as possible. A common lesson from decades of child death enquiries is the need for improved information sharing within and between agencies.

b) Further developing family support and intervention services (at para. 8):

YES ✓

If you have any further comments, please outline below.

While emphasis on family support and intervention is welcome, we think more work could usefully be done to specify the range of family support / preventative services that should be available as a minimum within each Trust, learning from current practice and experience. Decision-making about coming into care needs to be entirely transparent and reflect the services offered and available. The concern about the target to reduce by 20% the number of children in care is particularly relevant for the Gateway Teams as they are also to manage the admissions to care processes. We also have some concern about the recruitment of the specialist salaried foster carers, given the difficulties around recruitment of foster carers in

general. A further issue may ensue as to when support (which may have to include accommodation) offered by a specialist salaried foster carer will be defined as an admission to care or discharge from care.

c) Maximising the potential for children to benefit from family and friends placements (at para. 11):

YES ✓

If you have any further comments, please outline below.

We strongly support the proposals in this paragraph. We think that Trusts should be required to develop clear policies and procedures relating to family and friends care and a corresponding framework of support services. Consideration should be given to the adequacy of existing legislation and guidance to Trusts in this area.

d) Enhancing therapeutic support for children and families with very complex needs (at para. 12):

YES ✓

If you have any further comments, please outline below.

Although we support this development of therapeutic family support teams, we think careful thought needs to be given to the length of time that such teams could usefully work with a family. Is this meant to be a short-term or a long-term intervention and how long is long-term when a young person and their family all have very complex needs. Guidance will need to be considered to help identify at what point is care a better option for the young person? The point raised under 4b) about foster carer recruitment generally is also relevant here.

e) Strengthening early identification of children in need through information sharing and co-operation (at para. 13):

YES ✓

If you have any further comments, please outline below.

While we support improved cooperation between agencies in relation to the provision of family support services etc careful thought needs to be given to what sort of information needs storing and how it is to be shared (ref Richard Inquiry). The information sharing proposals that are being taken forward in England are both extremely expensive and complex and that learning should be reviewed in the Northern Ireland context. Issues around breaching confidentiality, major resource allocation to expensive administrative tools and accuracy and update of such tools remain very much at the forefront of concerns.

f) Better meeting the health needs of children (at para. 14):

YES ✓

If you have any further comments, please outline below.

There needs to be a stronger emphasis on physical health needs and corresponding links made to diet, exercise, leisure opportunities etc. The emphasis on assessment of psychological and emotional needs is good.

g) Evaluating the effectiveness of these initiatives (at para. 15):

YES ✓

If you have any further comments, please outline below.

We strongly support the focus on neglect and on evaluation although recognise the difficulties in undertaking the latter and how to ensure appropriate account is taken of qualitative issues rather than merely considering quantitative measures.

Chapter 5: Ensuring Children are in the Right Placements and Promoting Placement Stability

5 Chapter 5 emphasises the importance of ensuring that children are in appropriate and stable placements. Please indicate whether you support the actions in the following areas:

a) Ensuring adequate placement choice for children and young people (at para. 5)

YES ✓

If you have any further comments, please outline below.

We would like to emphasise the phrase “up to six weeks” within dedicated children’s homes or linked specialist foster care placements”. While we support the principle of careful assessment of needs, this should be done wherever possible before the child enters care. A shorter intensive assessment period in many cases may be workable as six weeks could seem like a lifetime to an individual child and could effectively put their life on hold. If a suitable placement is not available at the end of the six weeks, their six week placement will not have provided the benefits initially anticipated.

b) Further strengthening foster care and the range of placement options for young people (at para. 9):

YES ✓

If you have any further comments, please outline below.

Very good proposals but given the concerns about foster care recruitment generally it may be pertinent to consider prioritising these proposals to ensure maximum potential for successful delivery.

c) Ensuring appropriate consideration and assessment of children’s contact needs (at para. 14):

YES ✓

If you have any further comments, please outline below.

We welcome the emphasis on contact and the need to always give contact arrangements due consideration. It is an issue of fundamental importance to looked after children.

d) Maximising the extent to which children and young people are able to effectively participate in care planning and reviews (at para. 15-17):

YES ✓

If you have any further comments, please outline below.

We support these proposals

e) Increasing the number of independent LAC Chairs (at para. 18):

YES ✓

If you have any further comments, please outline below.

f) Supporting the promotion of a permanence ethos for looked after children (at para. 24):

YES ✓

If you have any further comments, please outline below.

We strongly welcome these proposals.

g) Expanding the role of Guardian ad Litem to deal with Special Guardianship applications (at para. 25):

YES ✓

If you have any further comments, please outline below.

A good idea.

h) Avoiding entry to criminal justice institutions for looked after young people (at para. 26):

YES ✓

If you have any further comments, please outline below.

If Care Orders are no longer suspended when a young person is sentenced to a Juvenile Justice Centre Order, HSTCs will require some redistribution of funding to ensure the Trusts fulfil their roles in respect of parental responsibility in a pro-active, caring manner.

i) Enhancing residential child care and address workforce issues within this sector (at para. 27-31):

YES ✓

If you have any further comments, please outline below.

We support the proposals to reduce the number of children living in residential children's homes.

Although we support the proposal to review staffing and qualification requirements within residential child care, we would like to see a timetable for this review. Plans are underway to pilot pedagogic approaches within residential care in England and the learning from those pilots will be of interest.

We support the proposals to appropriately introduce advocacy arrangements for all looked after children but the role of and training undertaken by the advocates must be supportive of the ethos and overall motivation of the residential and field work childcare staff.

j) Ensuring effective monitoring of Care Plans (at para. 32):

YES ✓

If you have any further comments, please outline below.

We strongly support the appointment of Independent Reviewing Officers (IROs) – there is so much learning in England following the legislation to require IROs and there is a strengthening of the IRO role in the English Care Matters White Paper. That learning needs to be considered in Northern Ireland. Further consideration needs to be given as to where IRO's fit within organisations and in particular to their accountability/line management structure within organisations.

Chapter 6: Corporate Parenting

6 Chapter 6 seeks to ensure that all professionals effectively exercise their role as corporate parent for children in care. Please indicate whether you support the actions in the following areas:

a) Emphasising and prioritising the responsibilities of corporate parenthood (at para. 3):

YES ✓

If you have any further comments, please outline below.

This is vital. It would be most helpful in this area if the future role of HSSA was clarified as soon as possible.

b) Better co-ordinating the health needs of children in care (at para. 6):

YES ✓

If you have any further comments, please outline below.

Consideration should be given to every looked after child having a named health professional to monitor their health needs in conjunction with their key social care professional. Guidance on the working interface between these 'leads' and the accountability structure in respect of independent reviewing officers, independent visitors, GALS etc will need to be drawn up.

c) Facilitating consistency in corporate parenting (at para. 8):

YES ✓

If you have any further comments, please outline below.

While we encourage the emphasis on delivering specialism and expertise in working with children in care, the relationship between the proposed specialist teams and senior management within Trusts needs to be clearly defined. E.g. the oversight of each young person's progress and wellbeing should be a fundamental responsibility of the senior "corporate parent" as well as of the specialist team. Similarly multi-agency liaisons by the specialist team on service provision needs to be backed up by senior management in terms of financial investment. Perhaps a solution would be for the membership of the multi-agency specialist team to be mirrored at a senior strategic level across all relevant agencies – this senior body would then take overall responsibility for strategic direction and major resourcing decisions. The English Care Matters document has proposed clear statutory guidance on

the responsibility of the Director of Children's Service to ensure that children in care are enjoying similar or better levels of engagement in positive activities as other children and young people of their age.

d) Providing effective and timely information to young people (at para. 10)

YES ✓

If you have any further comments, please outline below.

While we support the idea of a "pledge" from the state compliance needs to be monitored and incorporated into reviews.

e) Enhancing the effectiveness of care planning (at para. 11):

YES ✓

If you have any further comments, please outline below.

This is very good but could be strengthened further. Care plans should make very clear reference to permanence planning and should identify how the assessed needs of the child will be met on an ongoing basis. The emphasis should be less on recording the positive activities in which young people have chosen to take part but more on what positive activities need to be made available to the young person in question and how these will be delivered.

We would also welcome views on the following issues raised in Chapter 6:

- f) How best can we increase the freedom of social workers to address the needs of children in the context of transparent standards and financial controls (see para. 9)?**

Comments

The English proposals are largely aimed at permitting easier expenditure on “normal activities”. “From 2008 we will provide £500 a year for each child in care who is at risk of not reaching the expected standards of attainment to support their education and developmental needs”. While the local Fostering Achievement Campaign has been helpful it is for fostered children and may not have proactively incorporated the key social workers role. Enhancing the social workers role in this we would support as it may also allow for enhanced relationships between children and their social workers.

- g) How can we develop the role of Independent Visitors (see para. 12-14)?**

Comments

We think it is important not to confuse independent visiting/advising with advocacy

- h) Is it necessary or desirable to legislate for greater provision of advocacy to make it available to all children and young people in care? (see para. 15):**

Comments

We think it would be a major step forward to provide access to advocacy for children in care in a range of situations that go beyond the making of complaints.

We wish to refer back to our comments at 5 g) re the role and training undertaken by advocates and also the report’s statement of limiting the number of key persons involved with Children in Care.

Chapter 7: Education

7 Chapter 7 looks at how we can enhance the educational achievement of looked after children. Please indicate whether you support the actions in the following areas:

a) Creating dedicated education LAC teams in each of the new HSS Trust areas (at Paras. 8-9):

YES ✓

If you have any further comments, please outline below.

These are good ideas but perhaps further emphasis needs to be given to the role of teachers within schools in terms of supporting looked after children. In England schools are going to be required to appoint a teacher with statutory responsibility for looked after children – should this model be followed in Northern Ireland?

b) Better assisting foster carers and key workers to engage with learning and schools (at para. 14):

YES ✓

If you have any further comments, please outline below.

These are excellent ideas. BAAF is currently piloting a scheme with a local authority in England whereby all of its foster carers are following a new evidence-based programme to improve their skills in supporting the educational achievement of their foster children. The programme which focuses on literacy, helping with homework and understanding the school system in 2007 is designed to accommodate foster carers whose own experience of school and education may have been negative.

c) Ensuring an effective balance in terms of sharing information on looked after young people with and within the education sector (at para. 15-17):

YES ✓

If you have any further comments, please outline below.

We think further thought should be given to creating a designated teacher role for looked after children within each school who will subsequently develop expertise in this area. To give information solely to the principal teacher (who is already a very busy person!) may not turn out to be the most satisfactory approach.

d) Providing equal access to learning opportunities and additional support for children and carers to better meet the educational needs of young people (at para. 18-23).

YES ✓

If you have any further comments, please outline below.

We think these proposals could go further to guarantee a child or young person a place at the agreed school even when the school is full. More could also be done to prevent unnecessary moves of school particularly in the run up to key examinations or where transport to school could be provided. In England – Children in Care are now the top admissions criteria and the English Care Matters White Paper proposes that no school moves are allowed in years 10 and 11 except in exceptional circumstances.

- e) Paragraphs 24-34 consider how best to assist looked after children to access opportunities in further education and training. Are these measures sufficient to achieve a step change in outcomes for young people in and leaving care?

YES ✓

If you have any further comments, please outline below.

A good package of improvements.

Chapter 8

8 Chapter 8 highlights the need for improvements in services outside school and care provision to enhance the lives of young people in care. Please indicate whether you support the actions in the following areas:

a) Ensuring that other statutory agencies co-operate with HSS Trusts to deliver improvements for looked after children (at para. 2):

YES ✓

If you have any further comments, please outline below.

This is essential and needs to be a focus of inspection.

b) Assisting young people to enjoy life and participate in activities outside the school and care environments (at para. 7-8):

YES ✓

If you have any further comments, please outline below.

The English Care Matters document says that the Government in England will make clear in statutory guidance that it is the responsibility of the Director of Children's Services (DCS) to ensure that children in care are enjoying similar or better levels of engagement in positive activities as other children and young people of their age. The Lead Member for Children and Young People (responsible Councillor) will also have a role in ensuring that the DCS is fulfilling this responsibility.

The proposals in paragraph 8 are interesting.

c) Improving the identification and co-ordination of the health needs of looked after children (at para. 9):

YES ✓

If you have any further comments, please outline below.

These are good proposals but we also consider that a Co-Director within each Trust should take personal responsibility for ensuring that the health needs of looked after children are given appropriate priority at a strategic planning level.

d) Promoting the sexual and emotional health of looked after young people (at para. 10):

YES ✓

If you have any further comments, please outline below.

e) Avoiding alcohol and substance abuse amongst looked after young people (para. 12-13):

YES ✓

If you have any further comments, please outline below.

f) **Helping looked after children avoid crime and anti-social behaviour (at para. 16-18):**

YES ✓

If you have any further comments, please outline below.

g) **We would also like to seek views on the best way to ensure co-ordination, pooling of funding and joint commissioning to young people leaving custody and care (see para.18)**

Comments

This is likely to require the redistribution of some finances and the involvement of a leaving care personal adviser at the earliest stage possible.

Chapter 9

9 Chapter 9 identifies how all young people need support in making the transition to adulthood and outlines a range of actions which seek to meet the additional needs of looked after children during this important time. Please indicate whether you support the actions in the following areas:

a) Improving outcomes for young people leaving care (at para. 8):

YES ✓

If you have any further comments, please outline below.

b) Developing the infrastructure and services for young people making the transition to adulthood (at para. 11):

YES ✓

If you have any further comments, please outline below.

Coherent proposals.

c) Providing access to suitable living arrangements, including remaining with carers (para. 12-14):

YES ✓

If you have any further comments, please outline below.

d) Preparing young people for adulthood (para. 15):

YES ✓

NO

If you have any further comments, please outline below.

13 seems young to begin preparing some of the young people for adulthood. Some young people may only have entered the care system a short while earlier and it may be inappropriate to start thinking about adulthood when for some at 13 “re-parenting” may be more important.

e) Improving financial support for young people leaving care (para. 16):

YES ✓

If you have any further comments, please outline below.

Good proposals.

f) Assisting young people leaving care to continue in education, employment and training (para. 17 and 18):

YES ✓

If you have any further comments, please outline below.

It may be possible to require Trusts themselves as major employers to find some work experience opportunities for young people in their care within the Trust itself.

g) Increasing participation in higher education (para. 21-23).

YES ✓

If you have any further comments, please outline below.

We support these proposals particularly in relation to promotion of vacation accommodation.

h) We would welcome views on the feasibility of introducing a bursary to provide financial support to young people in higher education to meet the costs of tuition fees (see para. 22):

Comments

The proposal seems a good idea. Is there any strong reason beyond financial considerations why this contribution should not be 100% of the full cost of tuition fees? If a looked after child reaches university, the achievement should be recognised. Anything less than full support may act as a bar to engagement in higher education. The bursary award is likely to require annual review.

HUMAN RIGHTS

10. Do you think that the document promotes human rights? (Please tick)

YES ✓

NO

Comments

As the document places the child/young person at the centre of the process we feel it appropriately endeavours to balance the Human Rights of the child with the Human Rights of other parties.

11. Are there any aspects where potential violations may occur? (Please tick)

YES

NO ✓

Comments

EQUALITY IMPLICATIONS

12. Are the different needs of the different Section 75 groups of people adequately addressed by the actions? (Please tick)

YES ✓

NO

Comments

13. Are you aware of any evidence, either qualitative or quantitative, that the actions may have an adverse impact on equality of opportunity or on good relations? (Please tick)

YES

NO ✓

If yes, please comment on what you think should be added or removed to reduce or alleviate the adverse impact.

This document goes a long way to address any existing adverse impact on equality of opportunity.

14. If you feel the adverse impacts cannot be alleviated within the strategy outlined, please suggest alternatives that could be considered to reduce the adverse impact.

Comments

15. Could the strategy better promote equality of opportunity or good relations?
(Please tick)

YES

NO ✓

If so, please outline how.

ADDITIONAL COMMENTS

- 16. Are there any other issues you would wish to see covered by strategy? (Please circle)**

Comments

We would have welcomed a section on workforce development and training. In Chapter 5 under Care Planning and Supporting Permanence a specific recommendation about avoiding delay would be helpful. The interface with RQIA will require some further discussion in terms of inspection standards etc. The planned Children in Care Councils required by English Local Authorities under their Care Matters do not feature but perhaps a strong Regional Council could encompass some of the advocacy proposals mentioned.

- 17. Do you have any other comments, which you think might be relevant to the development of the strategy?**

Comments

The document is welcome and clearly sets out a vision for children in care and on the periphery of care. The establishment of the Project Management Board seems a positive way to take things forward as some work on prioritizing need and subsequent time-tabling of actions is now required. In respect of recommendations that will not incur undue extra financial commitment early identification of these would help so that work in these areas could commence in the near future and costings of the other recommendations would subsequently be more effective.

THANK YOU FOR YOUR COMMENTS

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