

Champion House

2 March 2007

Mrs Marna Bell
Family Policy Unit
C4.22 Castle Buildings
Stormont
Belfast
BT4 3SF



12-22 Linenhall Street
BELFAST, BT2 8BS
Tel: (028) 9032 1313
Textphone: (028) 9032 4980
(for people who are deaf)
E-mail: Enquiry@ehssb.n-i.nhs.uk
Web site: www.ehssb.n-i.nhs.uk

our ref:

your ref:

Dear Mrs Bell

FAMILIES MATTER: SUPPORTING FAMILIES IN NORTHERN IRELAND CONSULTATION RESPONSE

Please find the response of the Eastern Health & Social Services Board to the above consultation exercise.

We welcomed the opportunity to respond to the document and you will find comments in relation to the individual consultation questions attached.

However, I would like to make a general comment in respect of the overall policy framework. The current consultation relates to preventative services to support parents. Recently a consultation took place in relation to the development of Safeguarding Boards. Both of these were DHSSPS consultation documents. A more productive approach would be the development of a single overarching policy and strategy framework along the lines of the Every Child Matters agenda in England and Wales to provide comprehensive joined up approach to the development of children's services across agencies and sectors.

I hope you find the comments of interest.

Yours sincerely

A large, stylized handwritten signature in black ink, appearing to read "M. Kilbane".

Dr M Paula J Kilbane
Chief Executive

FAMILY MATTERS: SUPPORTING FAMILIES IN NORTHERN IRELAND

Q1 Do you agree that the aims stated are the right aims?

The intent of the stated aims is accepted. The suggestion that parents are 'created' by the Strategy needs reconsidered. A more appropriate statement of the aim is suggested below:

- (i) strengthening families to the benefits of children, parents, and society is the central aim of the Strategy. To achieve this aim parents require ready access to support, relevant information and opportunities to promote the development of their skills and abilities to enable them to discharge effectively their parenting responsibilities to their children;
- (ii) the second aim could be developed by adding to the end of it 'designed and developed in partnership with them'.

A concern would be that the aims set out in the strategy couldn't be achieved on a single Departmental Strategy basis. The Every Child Matters policy framework mentioned in the introduction is a comprehensive framework that covers a range of sectors and links family support to safeguarding and services to looked after children. To meet the stated aims will require a multi agency, multi disciplinary approach to developing a comprehensive range of universal and targeted support services.

Q2 Do you agree that the vision stated is the right vision?

The vision statement excludes reference to disabled children whose quality of life and contribution to the community in terms of economic activity maybe restricted. We suggest that the vision should be stated to include reference to:

- childhood being valued;
- recognition of the unique worth of each child/young person;
- recognition of the diverse needs of children in terms of religion, race, gender and ability/disability and the promotion of their inclusion;
- recognition of the vulnerability of children and their need for protection balanced against their ability to contribute to the design and delivery of services for them;

- promotion of and safeguarding of children's rights;
- promotion of children's right to family life;
- promotion of responsible citizenship in all members of a community/society.

Q3 The document lists the 10 principles that underpin the Strategy. Do you agree with the principles stated?

A number of the principles could be combined e.g.: 2nd, 4th, 5th and 6th could be stated as one principle in respect of policy. Similarly, 8th, 9th and 10th could be one principle. There should be principles relating to:

- the unique worth and value of children and childhood, not merely a preparatory stage for adulthood;
- promotion of the family as the key pillar in the care of children, unless this compromises the child's welfare and safety;
- pursuing family life for children, outside the birth family, where necessary;
- encouraging families and communities to bring up their youngest members where necessary with support from the State;
- the State's role as a support to children, parents, families and communities, unless intervention is required to protect children or vulnerable members;
- eradication of poverty to improve life chances of children and their families;
- work/life balance to support parents dealing with the demands of family life and employment.

Q4 The document lists 7 outcomes from the Children and Young Peoples Strategy, *Our Children and Young People – Our Pledge*? Do you agree that these are the right outcomes for this Strategy?

As the Strategy is wider than children and young people, there is also a need to include desired outcomes for:

- parents;
- families; and
- communities.

A general comment in relation to the vision, principles and outcomes section is that it would be preferable to link these in a more direct way to action points set out later in the document.

Q5 The focus of this Strategy is primarily on preventative and early intervention to support parents at particular times of need and at particular stages in the development of their child. Do you think that this is the appropriate scope for the Strategy?

The inclusion of caveats such as *at particular times of need* and *particular stages in the development of their child*, has the potential to confuse the Strategy with the statutory social services' responsibility for children in need (Article 17 of the Children Order) and their families. If the Strategy seeks to be preventative, it should be targeted at all parents and accessible to them regardless of the development stage of their child.

This highlights the issue raised in the response made in relation to Consultation Question 1 of the need for a comprehensive policy framework. Does the policy only relate to universal provision or does it intend to target vulnerable groups? If so, which groups and how would they be targeted? If the policy relates to universal provision how does the strategy ensure that those parents most in need of support are able to access it?

The definition of family and parent excludes foster carers and private foster carers. We think these should be included.

Q6 Do you agree that Theme 1 – Parental Support is an appropriate theme?

Parental Support is an appropriate theme.

Q7 Do you agree the actions suggested in Theme 1 are appropriate actions to take under this theme?

The actions outlined relate to:

- health visiting awareness;
- roll out of 9 new Sure Start projects;
- parenting classes to promote alternatives to physical punishment;
- parenting education;

- mediation for separating/divorcing parents; and
- Contact Centres.

These actions are necessary but are limited in their scope. For example, Sure Start in Northern Ireland is still targeted on the under 4s in deprived areas, the needs of adolescents & older primary aged children in these areas are not addressed by the strategy. How are parenting needs outside of the surestart areas to be addressed? Similarly, actions on developing parents' play and leisure activities with their children, possibly through reduced family admission costs at a range of activities, are not addressed.

The suggestion that Contact Centres could potentially deal with situations where there are concerns about *domestic violence, child abuse, or fear of abduction*, potentially places this service within the specialist statutory services rather than the preventative framework.

Q8 Do you agree that Theme 2 – Access To Information is an appropriate theme?

The availability of timely, up-to-date information is important.

Q9 Do you agree the actions suggested in Theme 2 are appropriate actions to take under this theme?

The development of a comprehensive information system is to be welcomed, however there is a need to link this work to existing information sharing processes rather than to duplicate these.

It is important in developing the helpline for it to be both piloted and vigorously evaluated to ensure that it is effective in meeting the needs of parents/families.

Q10 Do you agree that Theme 3 – Assessment of Needs is an appropriate theme?

The difficulty with this theme as it is outlined is that within the strategy the emphasis is upon universal preventative services to parents whilst the introduction of assessment implies a more targeted approach.

Q11 Do you agree the actions suggested in Theme 3 are appropriate actions to take under this theme?

The introduction of a common assessment process would be of great benefit. However it cannot be introduced as a single Departmental initiative or without a comprehensive joined up policy framework. The introduction of the CAF in England and Wales as part of the Every Child Matters Policy drive has taken the best part of five years. To assume a single Department can introduce a similar process here by April 2007 is unrealistic. It is of concern that the consultation process for the policy does not end until 30 March 2007 yet proposals are to be introduced by April 2007.

The UNOCINI document referred to is being introduced as a common referral and initial assessment tool for Trust Child and Family Care Services. This is significantly different to a common assessment process and the confusion evident within the policy is of concern.

Q12 Do you agree that Theme 4 – Information Sharing is an appropriate theme?

Theme 4 again demonstrates the lack of an overriding comprehensive policy framework. There is a clear benefit in those working with children and families to work together in a collaborative manner. Issues relating to confidentiality within a preventative strategy should only arise where child protection issues arise. In which case the matter would be outwith this Strategy with the only reference being how child safeguarding services can be accessed.

Q13 Do you agree the actions suggested in Theme 4 are appropriate actions to take under this theme?

The Every Child Matters framework in England and Wales includes the development of an integrated child index system to address the Laming recommendations. As mentioned earlier ECM is a comprehensive multi-sector policy framework with legislative and organisational drivers to support change. A similar framework does not exist within NI, which presents

difficulties in progressing both the common assessment process and the information sharing proposals.

In respect of statutory services the NIO, PSNI and HSS Boards are working to develop information-sharing protocols. Account would need to be taken of this work.

Q14 Do you agree Theme 5 – Integration and Multi-Agency Working is an appropriate theme?

The Theme can be considered appropriate but the narrative provides little information as to how this is to relate to the provision of parental support.

Q15 Do you agree the actions suggested in Theme 5 are appropriate actions to take under this theme?

The action relates to a single initiative to develop a limited number of children's centres. Whilst the development of these centres could be seen as a positive step if they add value to existing services within the areas concerned the strategy does not indicate how multi agency working can be developed in other areas to support parents. The policy lead for Surestart, and children's centres are to be developed within the context of surestart, has moved to DE the action is therefore not appropriately set within this DHSSPS strategy.

There is also little information on the purpose, structure and resources available to achieve the stated actions.

Equality Implications

The Consultation Paper does not address specifically children across all age bands. There is also no specific reference to disabled children or rural children. A more detailed screening is required, which should also screen for Human Rights compatibility.

Additional comments

The Strategy does not provide any detail as to the financial or workforce issues associated with its implementation.