



Subject:	Consultation response on SBNI Regional Child Protection / Safeguarding Policy and Procedures for NI
Date:	24 March 2017
Reporting Officer:	Nigel Grimshaw, Director City & Neighbourhood Services Department
Contact Officer:	Cate Taggart, Community Development Manager

Is this report restricted?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	The purpose of this report is to make Members aware of the Safeguarding Board for NI's consultation on the Regional Child Protection / Safeguarding Policy and Procedures and to seek Members' approval of the Council's draft response.
2.0	Recommendations
2.1	The Committee is asked to; <ul style="list-style-type: none">Consider the draft response and approve its submission to SBNI, subject to any comments or amendment provided, with the proviso that the response is subject to full Council approval at its meeting in April 2017.
3.0	Main report
3.1	<u>Background</u> <p>The Safeguarding Board for NI (SBNI) are currently consulting on the Regional Child Protection / Safeguarding Policy and Procedures and the consultation period commenced on Friday 23rd December 2016 and will run until Monday 6th March 2017. Council officers have been in contact with SBNI and have advised them that Council's final response cannot be submitted until the response is ratified by a full meeting of Council.</p>
3.2	<u>Summary of policy and procedures</u> <p>A copy of the SBNI Child Protection / Safeguarding Policy and Procedures is attached as Appendix 1 but in summary it is designed to improve the safeguarding of all children and</p>

young people living in Northern Ireland and to ensure that there is consistency across all agencies with regard to recognising and responding to potential concerns about a child or young person.

3.3 The Policy and Procedures are grouped under five Sections:

Section 1 Core Procedures

Section 2 Safeguarding Practice Guidance

Section 3 Individuals who pose a Risk to Children/Young People

Section 4 Roles and Responsibilities of the SBNI

Section 5 Protocols

3.4 Within each section there are a number of sub-sections relating to various areas of practice including listening to the voice of the child, how to respond to abuse and neglect and guidance as to how organisations should manage situations where abuse is linked with Faith or belief or where children are subject to abuse via digital media.

3.5 The procedures provide guidance on how agencies should respond where an adult may pose a risk to children and young people and the reporting mechanisms for alerting Social Services and the Police are detailed. Section 4 details the roles and responsibilities of Council as a member agency of the Safeguarding Board and highlights Council's responsibilities to work in partnership with others to safeguard children and young people.

3.6 Section 5 relates primarily to the medical profession and relates to specific instances of abuse in pre-mobile babies.

Draft Response

3.7 A copy of the draft response to the consultation is attached as appendix 2 and a summary of the key issues are outlined below. As the closing date for responses is prior to the April Council meeting it is proposed that the response, subject to any comments or amendments from Members, be submitted with the caveat that it is still subject to ratification at the full Council meeting.

3.8 The Council welcomes the publication of the SBNI Policy and Procedures and strategy and agrees with the overall objective to enhance the safety and welfare of children and young people. Council agrees with the key principles that safeguarding children and young people is everyone's business and, that in order to effectively protect them, there is a need to work in partnership with a wide range of statutory and community organisations.

3.9	<p>There is no proposal within the document for the current structures within SBNI to be changed and Belfast City Council remains committed to playing an active role on the Belfast Safeguarding Panel, working with others to ensure that where possible children are prevented from harm. Whilst the work of Council is varied, we recognise that many of our services are delivering to children and young people within local communities and we acknowledge our responsibility to ensure that those Officers and Members who are in contact with children and young people know how to recognise and respond to concerns about abuse.</p>
3.10	<p>It is noted that whilst the Policy and Procedures are very comprehensive, they would need further refinement to make them more user friendly and more accessible. It is unfortunate also that there was no specific consultation with the children and young people who find themselves the subject of these policies and procedures as they may have had useful views regarding this. Whilst child protection is not the core work of Council we make reference to the fact that this policy needs to link with the recommendations of the recent Jay review of SBNI and take into consideration any actions. We acknowledge also that there are additional recommendations included in the draft Adoption and Children's Bill which will impact on safeguarding practice and structures and again this will need to be considered.</p> <p>Section 1: Core procedures</p> <p>There are 8 sections contained within this area.</p>
3.11	<ul style="list-style-type: none"> i. <u>Communicating with Children / young people who have specific communication needs</u>: We agree with the content of this section but suggest that additional safeguarding training should be given to overseas interpreters and a link to overseas criminal records should be included in this section. It is suggested also that the Royal College of Speech and Language Therapists may be a useful source of expertise in this area. ii. <u>Ensure the voice of the Child / Young Person is heard</u>: We agree with the content of this section and we highlight the importance of engaging a child in play to communicate effectively with them. iii. <u>Responding to abuse and neglect</u>: We agree with the content of this section but highlight the need for consistent terminology relating to Social Services to be used throughout the document. We also highlight that as a Council we do not use the UNOCINI assessment (Understanding the Needs of Children in NI) and as such we do not make referrals to Social Services using this tool. This is line with other Councils across NI and we ensure that, where there is a need to report a concern about child

abuse or safeguarding, it is reported to the Gateway service by telephone and followed up in writing.

- iv. Policy and procedure on referrals: We agree with content of this section and highlight Council's positive relationship with the Belfast Trust through delivering joint safeguarding training and working together as members of the Belfast Safeguarding Panel.
- v. Policy and Procedure on assessment: We agree with the content of this section and highlight that assessment is not Council's responsibility.
- vi. Child Protection Enquiries: We agree with the content of this section and recognise our duty to provide information to inform an enquiry if needed but we highlight that that there is information missing related to the escalation procedures.
- vii. Child Protection case conferences: We agree with the content but reflect that it would be very unusual for a Council official to attend a case conference. We note that the procedures require a written report to be produced by all organisations attending a case conference. It is suggested that a written report need only be produced if a representative from the agency is unable to attend.
- viii. Child Protection register: We agree with the content but are asking for further clarity regarding the appeal process.
- ix. Medical assessment of alleged or suspected child abuse and neglect: Council do not have a role in this.

Section 2: Safeguarding Practice Guidance

There are 20 sections contained within this area.

3.12

- i. Abuse linked to faith or belief: We agree with the content of this section but suggest that a link to the safeguarding contacts for the main churches should be included.
- ii. Bullying: We agree with the content and are supportive of the restorative approach that is recommended.
- iii. Children living away from home: We agree with the content of this section but have no statutory responsibility for children living away from home.
- iv. Children affected by gang activity or serious youth violence: We agree with the content of this section but highlight that this section and one relating to radicalisation, paramilitarism and violent extremism could be combined. The work that Council is leading on with other partners via the Anti-social behaviour forums is highlighted as a positive example of intervening where young people may be at risk.
- v. Children from abroad: We agree with the content but highlight that the link to a document which is referenced has not been inserted.
- vi. Trafficked children: We agree with the content of this section and give an example

of the Human Trafficking event in City Hall as an example of how we work to raise awareness of this issue across all Council services.

- vii. Children/Young People missing from home: We agree with the content of this section.
- viii. Children of parents who misuse substances: We agree with the content of this section and highlight that although we don't provide direct services to this group we may enable support groups to use our premises.
- ix. Children / Young people of parents with learning difficulties: We agree with the content of this section but highlight the need to be consistent in the use of terminology.
- x. Children / Young people of parents with mental health problems: We agree with the content.
- xi. Children / Young people with a disability: We agree with the content and highlight Council's open access policy for services. The issue of hidden disability such as speech and language difficulties and Autism is also highlighted.
- xii. Domestic violence and /or sexual violence and abuse: We agree with the content and identify the steps taken by Council to make Council premises safe places for those who are victims and raise awareness of this issue for staff and visitors. We also recognise the long-term impact that domestic abuse and violence has on children.
- xiii. E-safety: Children exposed to abuse through digital media: We agree with the content of this section and identify the range of digital programmes on offer by Council to both children and adults across the city. We are aware of the importance of protecting children and young people on line and have highlighted the need to ensure that policies are updated in accordance with new and emerging online risks.
- xiv. Fabricated or induced illness: This is not an area for Council.
- xv. Female Genital Mutilation: We agree with the content of this section and have highlighted the close links that Council has with a wide range for newcomer groups. Key Council Officials have obtained additional training in this area and this will be included in future training programmes for key frontline staff across Council. It is noted that the NSPCC FGM helpline should be referenced in this section.
- xvi. Forced marriage: We agree with the content and highlight that it is not only women who can be the subject of forced marriage.
- xvii. Honour-based violence: We agree with the content of this section.
- xviii. Neglect: We agree with the content of this section and recognise that Council staff may identify families where children may be experiencing neglect. Reference is made to the Belfast Agenda and Council's ambition to reduce life inequalities and support and care for people who face multiple challenges.

- xix. Children and Young People against radicalisation, paramilitarism and violent extremism: Council welcomes the inclusion of this group in the procedures and acknowledges that where a child has been subject to a so called “community punishment or paramilitary style shooting” that this is a safeguarding issue and one which will require a response by professionals. We recognise our responsibility to work with others to safeguard children from such incidents and have highlighted the valuable work of the ASBO forums and the Policing and Community Safety Partnerships across Belfast in working to divert children and young people from offending and anti-social behaviour and reduce the risks of them being subject to this type of abuse.
- xx. Self-harm and suicidal behaviour: We agree with the content of this section but suggest that it may be useful for the policy to identify sources of training / support in this area.
- xxi. Children who display harmful sexual behaviour or developmentally inappropriate sexual behaviour: We note that this is not an area of direct work for Council but we agree with the content of this section and suggest that it may be helpful for the policy to signpost to services. It is suggested also that the word intervention could be used instead of treatment when referring to the programmes they will be engaged in. The importance of involving the Education Authority as a key agency for these young people is also highlighted.

Section 3: Individuals who pose a risk to children / young people

3.13

- i. Management and use of information concerning known and suspected offenders against children / young people: Council agrees with this content which relates to the Public Protection Arrangements for NI and notes that where Council becomes aware of such an individual this would be addressed with the PSNI and Social services.

Section 4: Roles and responsibilities of the SBNI

3.14

- i. Are you content with the policy and procedure on the Safeguarding Board for Northern Ireland?: Council has responded that it is not content with the roles and responsibilities of SBNI and has highlighted the need to implement the recommendations from the Professor Jay report. In addition it is suggested that, as the Child Death Overview Panel has not met since the inception of the SBNI , perhaps its function could be combined with the Case Management Review (CMR) panel.
- ii. Agency roles and responsibilities: Council’s role and responsibilities within SBNI

	<p>are defined in legislation and thus we agree with the content of this section.</p> <p>Sections 5: Protocols</p> <p><u>Pre-mobile babies protocol</u>: This is not an area that relates to the work of Council.</p>
3.15	<p><u>Financial & Resource Implications</u></p> <p>None associated with this report.</p>
3.16	<p><u>Equality or Good Relations Implications</u></p> <p>There are no relevant equality considerations associated with this report. SBNI have completed an associated equality and human rights policy screening exercise.</p>
3.17	
4.0	Appendices
	<p>Appendix 1: link to Draft SBNI Child Protection / Safeguarding Regional Policy and Procedures</p> <p>http://www.safeguardingni.org/consultation-safeguarding-board-northern-ireland-sbni-regional-child-protectionsafeguarding-policy</p> <p>Appendix 2: Belfast City Council - draft consultation response</p>