

# Feedback Questionnaire on Regional Policy and Procedures

## SECTION 1: CORE PROCEDURES

Are you content with the policy and procedure **Communicating effectively with Children/Young People Who Have Specific Communication Needs where abuse and or neglect is a presenting concern?** **YES**

If you have comments or amendments please specify below:

It may be useful to consult with The Royal College of Speech and Language Therapists in relation to the issues relating to communication as they have considerable expertise in this area.

It is suggested that there should be specific training in safeguarding and child protection for interpreters and other intermediaries who will be involved in child protection investigations and interviews to ensure that they are familiar with the processes and their role.

Reference is made to obtaining AccessNi checks but for interpreters from overseas there should be reference here to obtaining an overseas criminal record check and a link interested to the Gov.uk website to obtain additional information.

Are you content with the policy and procedure on **Guidance to Ensure The Voice of The Child/Young Person is Heard?** **YES**

If you have comments or amendments please specify below:

It would be helpful to make reference to all organisations working with children and young people rather than limiting this to health and social care organisations.

It is suggested that reference should be made to engaging children through play as a means to help them communicate. This is consistent with the key messages in the draft Children and Young People's Strategy currently out for consultation.

It may be helpful to state that communication should be at a level that is commensurate with the child's stage of development and level of understanding.

Are you content with the policy and procedure on **Responding to Abuse and Neglect?** **YES**

If you have comments or amendments please specify below:

It may be helpful here to include a link to the definition of "significant harm".

There is a need to ensure consistent use of terminology throughout the document as the use of different terms may be confusing e.g. Children's Social Services, Gateway services, Family and Child Care.

It should be noted that the use of UNOCINI is not appropriate for Councils as we have limited information and we will continue to make written referrals as required.

Are you content the policy and procedure on **Referrals? YES**

If you have any further comments or amendments please specify below:

The procedures for making a child protection referral are clear and Council has developed positive working relationships with Belfast Trust Gateway services and other Social services staff through the joint delivery of Keeping Safe Training to a range of voluntary and community groups across the city. This section on referrals is particularly lengthy and could be shortened to make it more user friendly

Are you content with the policy and procedure on **Assessment? YES**

If you have comments or amendments please specify below:

UNOCINI is not used within Councils and we have a limited role in assessment.

Are you content with the policy and procedure on **Child Protection Enquiries YES**

If you have comments or amendments please specify below:

Council recognises our duty to provide information in support of child protection enquiries but we play a limited role in this area.

It is noted that there is a good focus in this section on ensuring that the child is kept up to date with the progress of an enquiry.

It is useful to highlight the link to the escalation procedures if an investigation is disputed but it is notes that this policy is still under development.

Are you content with the policy and procedure on **Child Protection Case Conferences? YES**

If you have comments or amendments please specify below:

It is only in exceptional circumstances that Council staff would attend case conferences and it is noted that only those with a "significant contribution to make arising from professional expertise and/or knowledge of the child/young person or family". It is unlikely therefore that Council's involvement with a child or family will reach this threshold.

It is noted under point 16 that each organisation must provide a written report summarising their involvement with the child or family. Consideration should be given to only requiring a written report where an organisation is unable to send a representative to a case conference.

Are you content with the policy and procedure on **The Child Protection Register? YES**

If you have comments or amendments please specify below:

It is not clear in this section where an appeal should be made whether it is SBNI or the Trust panel – this needs to be clarified.

It may be useful to highlight for professionals in this section the issue of disguised parental compliance.

Are you content with the policy and procedure on **Medical Assessment of Alleged or Suspected Child Abuse and Neglect?**

**YES**

If you have comments or amendments please specify below:

Council would not have a role in this area.

## **SECTION 2: SAFEGUARDING PRACTICE GUIDANCE**

Are you content with the policy and procedure on **Abuse Linked to Faith or Belief? YES**

If you have comments or amendments please specify below:

There is a reference here to making a referral to “Children’s social care” the terminology here is confusing and needs to be consistent with the definitions / terms elsewhere in the policy.

This section should contain links to the safeguarding contacts for each of the four main churches in NI.

Are you content with the policy and procedure on **Bullying? YES**

If you have comments or amendments please specify below:

It is positive to see that restorative approaches are suggested for addressing bullying and engaging with both the victim and the perpetrator. It may be useful to reinforce that such an approach depends on having a skilled and trained restorative practitioner. It will be important to stress that all organisations working with children and young people need to have anti-bullying policies and procedures to effectively challenge bullying and support victims.

Are you content with the policy and procedure on **Children Living Away from Home? YES**

If you have comments or amendments please specify below:

Council would not have a role in this area.

Are you content with the policy and procedure on **Children Affected by Gang Activity or Serious Youth Violence? YES**

If you have comments or amendments please specify below:

There are links between this section and the one relating to radicalisation, paramilitarism and violent extremism and perhaps these two sections could be combined. Within some specific areas of Belfast there is evidence to suggest that children and young people are becoming engaged in gangs and are vulnerable to becoming involved in anti-social behaviour and alleged criminal activity. City Council are lead partners in convening area Anti-social behaviour forums across Belfast and these meetings provide useful ways of sharing information regarding young people who might be at risk and agreeing referral pathways for intervention. It is important that there is good information sharing between the Police and Trusts to ensure that local Social services are aware of emerging gangs in local communities and they have information about key children and young people who may be at risk of involvement.

Are you content with the policy and procedure on **Children from Abroad? YES**

If comments or amendments please specify below:

Again the terminology should be reviewed as the term "children's social services" is used and it is likely to be Gateway services that would be contacted.

It is noted that the link to the document "Pathway for safeguarding and promoting the welfare of separated / unaccompanied children arriving in Northern Ireland regional operational guidance is not inserted into the document.

Are you content with the policy and procedure on **Trafficked Children? YES**

If you have comments or amendments please specify below:

Council staff deliver a range of different services within local communities including environmental health, animal welfare, refuse collection and community services. Our frontline staff may be in a position where they may encounter children and young people who may have been the victims of trafficking. The policy and procedure provides clear guidance as to how to respond if they suspect that someone has been trafficked. Council is committed to raising awareness across all services of the risk of trafficking and recently convened a staff lunch-time seminar on this issue which was well attended by representatives from all Departments.

Are you content with the policy and procedure on **Children/Young People Missing from Home and Care? YES**

If you have comments or amendments please specify below:

Council would not have a role in this area but through the delivery of services may come in contact with a child or young person who is missing from home or care. In such cases the Council's safeguarding policy and procedure would be followed to report the incident.

Are you content with the policy and procedure on **Children of Parents Who Misuse Substances? YES**

If you have comments or amendments please specify below:

Although Council does not deliver direct services to adults who misuse substances, staff may encounter children through the After-schools provision or outreach work who are in families where substance misuse occurs and who may be impacted by this. In addition we may enable support groups to make use of our premises for their meeting and may encounter issues in this way. Council is content that the procedure of responding where parental substance misuse is identified is clear.

Are you content with the policy and procedure on **Children/Young People of Parents with Learning Difficulties? YES**

If you have comments or amendments please specify below:

There is a need to ensure consistent use of terminology in this section as in the introduction it is

noted that many adults prefer the use of the term difficulty rather than disability yet the term learning disability is also used in this section.

This is an area where Council would not have involvement.

Are you content with the policy and procedure on **Children/Young People of Parents with Mental Health Problems? YES**

If you have comments or amendments please specify below:

This is not an area where Council would have direct involvement.

Are you content with the policy and procedure on **Children/Young People who have a Disability? YES**

If you have comments or amendments please specify below:

Council has an open access policy for our range of services and encourages participation and engagement in our programmes and activities by young people with disabilities. Council staff are aware of the particular needs of children and young people who have a disability, including hidden disabilities such as Autism or speech and language and communication difficulties. Council recognises that children and young people may be particularly vulnerable to being abused. We acknowledge our responsibility to safeguard these children and to ensure that we are alert to any potential signs of abuse and have systems in place to communicate effectively with these children and young people.

Are you content with the policy and procedure on **Domestic Violence and/or Sexual Violence and Abuse? YES**

If you have comments or amendments please specify below:

Belfast City Council has invested in training and awareness raising regarding the impact of domestic abuse and violence and we operate a Safe place both for staff and visitors to our premises in order that individuals who are victims of domestic abuse can be supported and signposted to services that can help them. We recognise the trauma and the long-lasting impact that domestic violence and sexual abuse and violence can have on children and young people and acknowledge that young people in relationships can be particularly vulnerable. Those staff working with children and young people are alert to these risks and will follow BCC safeguarding policy and procedures if concerned.

Are you content with the policy and procedure on **E-Safety: Children Exposed to Abuse through the Digital Media? YES**

If you have comments or amendments please specify below:

Council deliver a range of digital programmes to both adults and children and we are aware of the importance of safeguarding children on line and responding to incidents of abuse online. Council have Belfast Wi-Fi to enable citizens to access the internet and robust systems are in place to ensure safe usage by all users including children and young people.

There is a need to consider referencing the need for further education in the area of internet safety for children and young people and their parents / carers to balance the comments related to sexting and criminal prosecution. If children and young people can be educated about keeping themselves safe online and the dangers of sending or receiving inappropriate images this could reduce the likelihood of prosecutions being initiated.

It may be helpful here to highlight the link between online abuse and mental health for young people as there have been documented cases in NI of young people who have engaged in self-harm and completed suicide as a result of abuse through digital media and all professionals working with children and young people need to be alert to this risk.

There is a need also to ensure that parents are given sufficient information to support their child's use of the internet and keep them safe. Any policy relating to e-safety will need to be reviewed and updated on a regular basis in line with new and emerging online risks.

Are you content with the policy and procedure on **Fabricated or Induced Illness? YES**

If you have comments or amendments please specify below:

This is not an area that is related to the work of Council.

Are you content with the policy and procedure on **Female Genital Mutilation? YES**

If you have comments or amendments please specify below:

Council staff work closely with a wide range of Newcomer families, including asylum seekers and community groups delivering services to an increasing number of people of different nationalities across Belfast. Council staff are aware of the risks of FGM to children and young women and of the need to recognise the risks and report any concerns. Additional safeguarding training for key frontline staff will be delivered to further raise awareness and ensure that this form of abuse is reported and acted upon. It may be helpful also to include a link in this section to the NSPCC FGM helpline which is a useful source of information and support for organisations.

Are you content with the policy and procedure on **Forced Marriage? YES**

If you have comments or amendments please specify below:

It is useful that the policy recognises that young men too can be the subject of forced marriage and it is something that all frontline staff need to be alert to.

Are you content with the policy and procedure on **Honour-Based Violence? YES**

If you have comments or amendments please specify below:

Belfast City Council delivers a range of services to women from a range of ethnic minority backgrounds. It will be important for staff to be aware of the issues related to honour-based violence and how to respond and seek support for victims.

Are you content with the policy and procedure on **Neglect? YES**

If you have comments or amendments please specify below:

It is acknowledged that neglect is one of the most damaging and widespread forms of abuse against children and all organisations need to be vigilant with regard to identifying children who may be suffering neglect and taking appropriate action to safeguard them. The issue of poverty and neglect is recognised in the Council's plan for the next 20 years, the Belfast Agenda and through the "Making Life Better" strategy we are committed to working with our partners to reduce life inequalities and support and care for people who face multiple challenges in our city.

In the messages for good practice in this section of the policy there is a line stating: "it is important to avoid the 'start again' syndrome." There is no clarity here as to what this means and although reference s made to this later in the narrative it might be more helpful to stress that regardless of any change in circumstances those involved with a family need to give full consideration to the previous history and range if interventions that have already been put in place. They need to adopt a holistic approach to assessment and a systems approach engaging with all other relevant professionals.

Are you content with the policy and procedure on **Safeguarding Children and Young People against Radicalisation, Paramilitarism and Violent Extremism? YES**

If you have comments or amendments please specify below:

Belfast City Council welcomes the inclusion of children / young people and paramilitarism as a safeguarding issue and would highlight the unacceptability of so called "punishment" beatings or shootings. Council regards these types of incidents as child abuse and would initiate a child protection referral where such an issue arises. It is acknowledged that the culture of "gangs" is not as evident in NI as elsewhere but all professionals need to be alert to the potential risks of gangs emerging. Council recognises our responsibility in accordance with Cooperating to Safeguard Children and Young People 2016 to work with HSCTs, Community and voluntary organisations and statutory partners to develop and strengthen existing links to prevent harm happening as well as working



together to provide a multi-agency response where harm of this nature has occurred. Council leads on a number of forums with other key partners such as the Anti-Social Behaviour Forums for Belfast and convenes the Belfast Police and Community Safety Partnerships and four area District Policing and Community Safety Partnerships. These partnerships invest significantly in interventions that will:

- divert children and young people from offending behaviour
- raise their awareness of the consequences for their life chances of engaging in offending behaviour
- invest in the personal development of the young person to enable them to make positive choices
- raise their awareness of how to keep themselves from becoming a victim of crime

This may also include children / young people at risk of involvement in paramilitarism, radicalisation and violent extremism.

Are you content with the policy and procedure on **Self-Harm and Suicidal Behaviour? YES**

If you have comments or amendments please specify below:

Belfast City Council recognises the risk posed to children and young people through self-harm and is content with the policy and procedures in relation to this issue. It may be helpful to include sources of training for addressing self-harm such as Mental Health First Aid which could assist practitioners in intervening early to prevent escalation of self-harming behaviours.

Are you content with the policy and procedure on **Children who Display Harmful Sexual Behaviour or Developmentally Inappropriate Sexual Behaviour? YES**

If you have comments or amendments please specify below:

This is not an area directly related to the work of Council.

It may be helpful however to add information here as to what sources of specialist advice are available and how to access them. It would also be helpful to identify the Specialist projects who will work with children and young people who display harmful sexual behaviour.

The use of the word "treatment" in describing the intervention programme for a young person who has engaged in harmful sexual behaviour is perhaps taken from the adult treatment programmes for sex offenders. For children and young people it may be more helpful to consider the use of the word intervention rather than treatment as it may be more child friendly.

A number of agencies are listed as having key involvement with children and young people who display HSB and the importance of multi-agency working. The Education Authority is not listed and where a child or young person has displayed HSB and is either of school age or attending Further Education the appropriate education professional will need to be involved in contributing to and implementing a risk management plan for that young person.

### SECTION 3: Individuals who Pose a Risk to Children/Young People

Are you content with the policy and procedure on **Management and Use of Information Concerning Known and Suspected Offenders Against Children/Young People?** **YES**

If you have comments or amendments please specify below:

City Council staff may come in contact with individuals who may pose a risk to children / young people because of previous offending and would take steps to report this to Social Services if required. Council has robust HR management systems in place to ensure that those who have direct contact with children and young people are subject to the appropriate criminal records checks. The section regarding risk management meetings is repetitive here and could be shortened.

### SECTION 4: ROLES AND REponsibilities OF THE SBNI

Are you content with the policy and procedure on **Safeguarding Board for Northern Ireland (SBNI) - Role and Function** **NO**

If you have comments or amendments please specify below:

The specific functions of SBNI are clear and Belfast City Council would be in agreement with these 4 overarching functions. However it is suggested that more needs to be done to promote communication with children and young people and engage them with the functions of SBNI.

It will be important to ensure that the recommendations of the recent Professor Jay report are taken into consideration when looking at the roles and responsibilities of the SBNI. Previously there was a disconnect between SBNI and the panels and a lack of strategic direction from SBNI. There is a need to ensure that the panels have the flexibility to respond to local identified safeguarding / child protection issues as well as deliver on the wider SBNI agenda.

There seems to be some overlap between the CMR panel and the Child Death Overview Panel and whilst a decision has been made to defer the setting up of the CDOP it is suggested that the work of this panel could be taken on by the CMR panel.

Are you content with policy and procedure on **Agency Roles and Responsibilities?** **YES**

If you have comments or amendments please specify below:

Belfast City Council is content with the policy and procedure as it relates the responsibilities of local councils. Council acknowledges our responsibilities in accordance with Section 18 to report on actions to promote safeguarding within the organisation.

## SECTION 5: PROTOCOLS

Are you content with [The Pre-mobile Babies Protocol](#)? **YES**

If you have comments or amendments please specify below:

This is not an area of the policy that relates to Council.