



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

www.dhsspsni.gov.uk

Co-operating to Safeguard Children and Young People in Northern Ireland

Consultation Questionnaire

RESPONDING TO THE CONSULTATION

The DHSSPS / NI Government Departments are seeking your views on the draft policy document 'Co-operating to Safeguard Children and Young People in Northern Ireland' Please use this questionnaire to tell us your views on the draft document.

Please send your response, **no later than 21 August 2015**, to:

DHSSPS Core Team

Room A3.5
Castle Buildings
Stormont Estate
BELFAST BT4 3SQ

E-mail: Child.Safeguarding@dhsspsni.gov.uk

Please note that all responses will be treated as public and may be published on the DHSSPS website. If you do not want your response to be used in this way, or if you would prefer for it to be used anonymously, please indicate this when responding.

(See Statement of Confidentiality and Access to Information Legislation below).

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Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with access to information legislation: these are chiefly the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004 (EIR).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice (section 45) with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the DHSSPS.

For further information about confidentiality of responses please contact the Information Commissioner's Office

Information Commissioner's Office Northern Ireland

51 Adelaide Street
Belfast, BT2 8FE

Tel: 028 9026 9380

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Email: ni@ico.gsi.gov.uk

Website: www.informationcommissioner.gov.uk

Please tick the box below if you do want your response to be treated as anonymous.

I want my response to be treated as anonymous.

Thank you for completing this questionnaire and providing input to this consultation.

ABOUT YOU

Consultee Details

I am responding as... *(Please tick appropriate option)*

A member of the public

A professional / practitioner working with children, young people and families *(Please specify which area / sector)*

Health and Social Care

Education

Justice

Other.....*(Please specify)*

On behalf of an organisation

Other.....*(Please specify)*

Question 1(b):

Please enter your details below:

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POLICY AIMS AND PRINCIPLES

Question 1:

Do you agree with the aims and principles in the draft policy? (*Please tick one option only*)

Yes

No

If no, please explain why and / or let us know how you think these could be improved.

Women's Aid Federation Northern Ireland (WAFNI) welcomes and agrees with the policy aims and principles presented on pages 7 and 9 of the strategy document.

However, we wish to highlight our concerns regarding what we view as a significant gap in both.

- J Given the necessary emphasis on early intervention and prevention that is inherent in safeguarding, we are surprised to note there is no reference in either the policy aims or principles in relation to working directly with children and young people to increase their understanding of keeping safe and to empower them to access support when necessary. This is the essence of prevention and can empower and enable young people to avoid potentially harmful situations or to avail of appropriate support when if and when they find themselves in danger.
- J The second aim, provided on page 7, refers to a need to prevent harm occurring by increasing public awareness of harm and its effects, we suggest this does not go far enough. There should be specific reference to the need to increase awareness of risk factors, keeping safe and how to access support when needed with children and young people directly. CAADA research¹ drawing upon 877 cases of children exposed to domestic violence revealed that 62% of children were also directly harmed as well as witnessing the abuse. Worryingly only 56% knew how to keep themselves safe.
- J There is a clear opportunity to raise awareness of such issues in education settings and schools and colleges have a vital role to play in this.
- J Women's Aid Federation Northern Ireland strongly believes that eliminating abuse begins with preventing abuse. Preventative education work with all children and young people in schools and community settings is essential to ensure that environments are created where children and young people are empowered to take action to keep themselves safe and access support if and when they experience any form of abuse or are presented with potentially harmful situations. We believe therefore that preventive education programmes need to be built into the school curriculum at both primary and post primary levels.
- J Women's Aid Federation Northern Ireland has, over the last number of years, led

¹ CAADA (February 2014) In Plain Sight: Effective help for children exposed to domestic abuse, CAADA 2nd National Policy Report

the way in developing and implementing strategic and creative approaches to addressing issues of personal safety in education settings. Over the past 6 years, Women's Aid Federation Northern Ireland has delivered a capacity building programme in primary schools "*Effective Communication Skills for Social Guardians Delivering Helping Hands*" which develops teacher's skills to fulfil their roles as social guardians through delivering the renowned and highly successful Helping Hands pack. Plans are also in place for the roll out of a capacity building model for teachers in post primary schools, to enable them to develop their capacity to deliver the post primary education package "Heading for Healthy Relationships" (H4HR). This work has been, and continues to be, delivered in partnership with the Department of Education and has been externally evaluated with extremely positive outcomes for teachers and children.

- J With this in mind, we would strongly suggest the inclusion of an additional aim at page 7 along the lines of "Promote awareness of keeping safe messages among children and young people, to empower them to feel safe and access support when needed".
- J Additionally, we would suggest the inclusion of an additional principle on page 10 (or an extension of the *prevention* principle already presented) along the lines of "The importance of empowering children and young people through preventative education approaches to feel safe and access support interventions when required".
- J We would also like to see the importance of training for all professionals working with children, young people and families emphasised in both policy aims and principles. Effective training can provide a strong foundation for the delivery of this policy by building professional capacity to respond to abuse quickly and appropriately. Tailored training will lead to increased understanding and confidence when dealing with safeguarding issues.
- J In relation to the legislative context provided at page 8 of the draft policy document, we welcome the reference to the United Nations Convention on the Rights of the Child (UNCRC) as the overarching framework for promoting children's rights.
- J We welcome the inclusion of those rights presented which are specific to the policy. However, we feel there are additional UNCRC rights which are extremely relevant to this policy which have not been presented here, these include, Article 2, Non Discrimination, Article 3, Best Interests of the Child, Article 9, Separation from Parents, Article 12, Respect for the Views of the Child, Article 17, Access to Information, Article 23, Children with Disabilities and Article 29, Goals of Education. While we understand all 41 rights in the convention cannot be listed, we do feel these are particularly relevant to this policy and set the overarching children's rights context, which is necessary for the draft policy document, ensuring a child centred, rights based approach.

DEFINITIONS:

Question 2:

Do you agree with the definitions in the draft policy document? *(Please tick one option only)*

[] Yes

[x] No

If no, please explain why and let us know how you think this could be improved.

Women's Aid Federation Northern Ireland (WAFNI) welcomes the definitions provided at section 2 of the draft policy document. In particular we welcome the statement provided at 2.1 (page 12) that safeguarding is more than child protection. We completely endorse the view that safeguarding begins with preventative activity, which enables children, and young people to grow up safely and securely in circumstances where their development and wellbeing is not being adversely affected. We additionally welcome the emphasis placed upon supporting families and early intervention.

We welcome the definitions provided at sections 2.2 and 2.3 (pages 11 and 12) in relation to Children in Need and Concepts of Harm and Significant Harm. These are very useful and provide a clear context for the remainder of the draft policy.

However, we have concerns relating to the types of harm provided at section 2.4 (page 12) of the draft policy document i.e. physical abuse, sexual abuse, emotional abuse, exploitation and neglect, specifically in relation to that of **emotional abuse**.

- J We note a change in this definition since the last publication of this policy in 2003. We strongly query the omission of domestic violence under the definition of emotional abuse provided in this revised draft policy document. This is, we note, a deliberate amendment from the definitions provided in the previous 2003 publication, which stated, "*domestic violence, adult mental health problems and parental substance misuse may expose children to emotional abuse*".
- J Domestic violence has adverse effects on children and young people, both emotional and physical and such effects can be traumatic. Domestic violence can impact upon all areas of life, including, health, education, the development of relationships, recreation and social activities. UNICEF research released in 2006², showing per capita incidence, indicates that there are approximately 32,000 children and young people living with domestic violence in Northern Ireland. CAADA research³ drawing upon 877 cases of children exposed to domestic violence revealed that 62% of children were also directly harmed as well as witnessing the abuse. This research highlighted that children exposed to domestic violence suffer serious multiple physical and mental health consequences:
 - 52% had behavioural problems

²UNICEF (2006) Behind Closed Doors, the Impact of Domestic Violence on Children. Body Shop International plc. West Sussex

³ CAADA (February 2014) In Plain Sight: Effective help for children exposed to domestic abuse, CAADA 2nd National Policy Report

39% had difficulties in school

60% felt responsible for the negative events

Others felt unhappy (43%) worried (52%) and angry (43%).

- J The negative and damaging impact of domestic violence on children and young people's emotional well-being is strongly documented and evidenced by a wealth of research, which has identified domestic violence as an underlying theme behind a wide range of social issues such as, school exclusion, youth homelessness and young people engaging in risk taking behaviour. Children and young people who experience domestic violence are emotionally vulnerable and in need of support.
- J We question why the reference to domestic violence has been omitted in the definition for emotional abuse in the new draft policy document and recommend either reverting back to the original 2003 definition, or providing an additional statement in relation to domestic violence and its impact upon children and young people in this section.

SAFEGUARDING RESPONSIBILITIES

Question 3:

Do you agree with the safeguarding responsibilities of key agencies and sectors as set out in section 3 of the draft policy document? *(Please tick one option only)*

Yes

No

If no, please explain why and let us know how you think these could be improved.

Women's Aid Federation Northern Ireland (WAFNI) welcomes the responsibilities of key agencies set out at section 3 (page 14) of the draft policy document. We are delighted to note the significant progress that has been made since the previous publication in 2003, in particular the establishment of the Safeguarding Board Northern Ireland (SBNI). The responsibilities of each agency highlighted clearly acknowledges the specific roles of each agency in relation to child protection and safeguarding and also highlights how agencies can and should work collectively, to promote the needs of children and young people who are at risk of or experiencing abuse.

However, we do have some suggestions for strengthening/improving this section of the document.

- J In relation to reference to Health and Social Care Trusts provided at section 3.1.2 (page 16) of the draft policy document, we would welcome a stronger reference to and perhaps some relevant examples of how HSCTs work in partnership with the community and voluntary sector. Women's Aid in Northern Ireland has a long and very successful history of working in partnership with local HSCTs to share and act upon safeguarding concerns and to promote the safety and well being of children and families. Women's Aid has engaged in an innovative model of service delivery, which involves Women's Aid Workers working directly with Gateway teams and presents a proactive, interagency approach to tackling domestic violence, based upon early intervention and prevention. The model is based upon an understanding of the need for effective partnership working at all levels of need and is based upon a foundation of close collaborative working to achieve positive outcomes. The implementation of this model across the some Trust areas provides an innovative, proactive and preventative early response to families, based upon a wealth of expertise from all partner agencies involved and a good example of statutory and voluntary sector working together to promote early intervention with families at risk.
- J We welcome the reference to the role of Social Workers provided at section 3.1.4 (page 17) as the lead professionals for safeguarding children and young people. We would welcome, once again, a stronger reference in this section to the importance of Social Workers working in partnership and in close collaboration with other agencies, including the voluntary and community sector. This is crucial in terms of promoting effective referrals, timely information sharing and a clear understanding of each agencies roles and responsibilities. It is also vital to enable informed decisions to be made, by ensuring Social Workers have a full understanding of the family circumstances and support needs.

- J We welcome reference to the role of Health Professionals provided at section 3.1.5 (page 18) of the draft policy document and agree that health professionals are well placed to prevent harm occurring through early identification of need and risk and through provision of support to children, young people and families in need. We agree that health professionals will often be the first to identify families at risk and those who are experiencing difficulties. This is often the case for families with younger children and babies who may not yet be in contact with other professionals such as education professionals.
- J We agree that health professionals must play their part in assessing need and family support planning and provision. To enable this to happen, we believe robust training and development opportunities are crucial to support and empower health professionals to identify and act upon concerns with confidence and understanding. We would therefore like to see the importance of training emphasised in this section and throughout the entire document for all those who come into contact with children, young people and families who may be at risk.
- J Additionally, Women's Aid would welcome reference to the importance of routine enquiry in relation to domestic and sexual violence and the need for its implementation as core practice for all health professionals, including midwives, health visitors GPs etc. This is not currently in place for all health care professions and is only practised in some Health and Social Care Trusts. Where this has been in practice, it has proved to be extremely successful and has presented a lifeline for families who are experiencing domestic and sexual violence.
- J We welcome the reference to education provided at section 3.3 (page 20) of the draft strategy document. We particularly welcome the emphasis placed upon the preventative role education can play as well as that of protecting children and young people through policies and practice. However we feel this short reference does not in itself do justice to the importance of working directly with children to increase their understanding of potential risks and to promote keeping safe messages. We would like to see the importance of preventative education strengthened in the aims and principles of the policy as stated in our response to question 1 and additionally throughout the document. We strongly believe educating young people is core to effective safeguarding as it empowers and equips young people to safeguard their own well being from the outset.
- J We strongly agree that age appropriate education programmes must be built into the school curriculum, to make children and young people aware of risk factors, where support can be obtained and to empower them to recognise how to seek assistance when they are at risk of harm or being harmed. We believe this cannot be achieved in a vacuum but needs to be surrounded by a clear support framework that ensures issues raised for both children and young people and for teaching staff can be addressed in a timely and supportive way. The need for schools to work in partnership with and refer onto the appropriate agencies is crucial. This approach is inherent in the highly successful preventative education approaches developed by Women's Aid Federation Northern Ireland in partnership with the Domestic and Sexual Violence Unit, DHSS&PS and the Department of Education. Women's Aid Federation Northern Ireland has developed and implemented a strategic way forward, to ensure all children and young people in Northern Ireland have access to

preventative education programmes such as Helping Hands and Heading for Healthy Relationship (H4HR). To date this has been achieved through the development and roll out of an accredited training programme, which builds capacity and support for primary school teachers to deliver Helping Hands. Feedback from schools highlights the importance of the programme and the need for continued delivery.

-) We welcome reference to the voluntary, charitable, faith and community-based organisations at section 3.6 (page 23) of the draft policy document. However we feel that this short reference does not fully encompass or give credit to the vital role the community and voluntary sector (CVS) plays in safeguarding children and young people. Given the nature of services provided by this sector, CVS organisations are ideally placed to identify families at risk and either, provide support services or refer on to the necessary agencies. There is a clear need for collaboration between all sectors if children and young people are to be effectively safeguarded from harm. In particular, there is a definite need for HSCTs to be aware of and to promote with families, local support services provided by CVS organisations so that they can refer families in need of support. There is also a need for sharing of knowledge and skills, especially in relation to domestic violence as a safeguarding concern.

PREVENTION AND EARLY INTERVENTION

Question 4:

Do you agree with the policy for prevention and early intervention as set out in section 4 of the draft policy document? (*Please tick one option only*)

Yes

No

If no, please explain why and let us know how you think these could be improved.

Women's Aid Federation Northern Ireland (WAFNI) believes there is an obvious omission in this section and that is a clear and strong emphasis on the importance of promoting awareness of keeping safe messages with children and young people directly. We have already highlighted concerns regarding this in previous responses to questions. We strongly believe in the need to equip and empower children and young people to keep themselves safe in potentially harmful situations and are disappointed to find this is not embedded in this key and overarching safeguarding policy for Northern Ireland.

- J Learning about keeping safe and accessing support is a universal need for all children and young people and a clear and distinct education right. We feel this is an omission throughout the entire document but particularly in this section given the emphasis on prevention and early intervention. We believe it is crucial for this section to have reference to the need to support and empower children and young people at all ages, to identify risk factors and to be aware of where and how support can be accessed to enable them to feel safe and protected when they are at risk of harm. We strongly recommend the inclusion of a paragraph in this section to outline the importance of this preventative approach.
- J We welcome the reference to early intervention and family support provided at section 4.3 (page 26) of the draft policy document. Women's Aid in Northern Ireland strongly believes in the need to work with families at the earliest possible stage to address concerns and prevent potentially abusive situations from escalating.
- J A wealth of research highlights the importance of support provision to families experiencing domestic violence at the earliest possible stage. Recent research by SafeLives⁴ (formerly CAADA) highlighted the importance of identifying families at risk at the earliest possible stage. This research stated "We have to find every family where there is domestic violence more quickly". It estimated that families live with high-risk abuse for approximately 2.6 years before getting effective help with some victims suffering over 50 incidents of domestic violence before getting the help they need. It also highlighted that 85% victims sought help from professionals 5 times in the year before they got effective help to stop the abuse. The overall conclusion of this research was the need to create a system to find every family as quickly as possible, and get the response right, first time, for every family.

⁴ SafeLives (2015) Getting it Right First Time

- J We have some concerns in relation to the statement presented at the bottom of page 26 *“It is therefore vital for all health and education professionals act on such concerns at an early stage in order to mitigate the risk of the child experience significant harm. To do this, they should have a frank and honest conversation with parents or carers and seek to build motivation to change with parents/carers”*. Our concerns relate to the potential risk having such *frank and honest* conversations can pose to all involved, children and young people, parents and in some cases professionals. If a child has made tentative steps to disclose parental behaviour which is concerning, to immediately discuss this with parents may place a child in greater danger and needs to be approached carefully and with consultation with appropriate agencies. If there is concern about domestic violence, to discuss this with both parents could place the victim of that violence in greater danger.
- J Such processes need to be approached carefully and sensitively and need to be surrounded by a support network of organisations, that can provide additional information and support to all involved, professionals, parents and children. We would recommend the inclusion of statement in this paragraph to emphasise the need for caution, sensitivity and informed supportive processes.
- J In relation to section 4.4 (page 27), we welcome the concept of **safeguarding aware and supportive communities**.
- J We welcome the need for services, which are **safeguarding sound** as outlined in section 4.5 (Page 27) of the draft policy document. At section 4.5.3, we agree that organisations, which provide services to adults, have a responsibility to be alert to risk of harm to the child or young person in the care of an adult to whom they are providing services, particularly in the cases of those working with adults at risk.
- J We would welcome a specific reference to domestic violence in this section as a clear example of where risk posed to an adult may also present risks to children. The links between domestic violence and child protection are clearly documented in research. Research highlights that children growing up in a family where domestic abuse is present are more likely to experience physical abuse themselves, with estimates ranging between 30 and 66 %⁵. Women’s Aid Federation Northern Ireland strongly believes that the best way to support and protect children in families where domestic violence exists is to work with and support the victim of domestic violence, which in the majority of cases will be the mother.
- J Through the whole of section 4 we would like to see a stronger emphasis on training for all professionals working with children, young people and families. At page 30 it states “Front line professionals who work with children and their families must be able to recognise, and know how to act on, concerns that a child or young person may be at risk of harm”.
- J This will only happen if professionals are supported and equipped with robust information and training opportunities which develop confidence, increase awareness and address concerns. Such training needs to provide a

⁵ Hester et al (2000); Edleson (1999); Humphreys and Thiara (2002)

comprehensive overview of the context and nature of abuse (including reference to domestic violence), reporting and referral mechanisms as well as a policy and legislative overview. It is also crucial that professionals are skilled in providing a positive and sensitive response to initial disclosures.

PROTECTION

Question 5:

Do you agree with the policy for protection as set out in section 5 of the draft policy document? *(Please tick one option only)*

Yes

No

If no, please explain why and let us know how you think these could be improved.

Women's Aid Federation Northern Ireland (WAFNI) welcomes the range of responsibilities set out in section 5 in relation to protection of children and young people.

This is extremely informative for all professionals and provides a very comprehensive overview of processes involved when reporting and dealing with child protection concerns.

Additionally we welcome the reference to making effective use of legislative powers, once again this gives a very comprehensive overview of the surrounding legal framework and the legal orders available to enable HSCTs to fulfil their obligations to safeguard and protect children.

ENGAGING WITH FAMILY

Question 6:

Do you agree with the policy proposals in relation to engaging with family as set out in section 6 of the draft policy document? (*Please tick one option only*)

Yes

No

If no, please explain why and let us know how you think these could be improved.

Women's Aid Federation Northern Ireland (WAFNI) agrees with the policy proposals for engaging with family as set out in section 6 of the draft policy document.

However we do have some suggestions for strengthening/improving this section.

- J We strongly agree with the need to support children and young people in age appropriate ways and in keeping with their abilities, to understand the nature and extent of their involvement in safeguarding decision-making. This promotes their rights and ensures they are fully aware of what is happening and why, in a safe and supportive way. We understand this can be difficult and welcome the statement that children who lack capacity may require personalised or specific advocacy support.
- J We strongly support the need to engage with families. We particularly welcome the statement provided at section 6.3 (page 40), which states "*Agencies and organisations providing services to adults should always consider whether there are children in the family and routinely consider the potential impact of parental problems on the children.*" Once again we would welcome specific examples of this including domestic violence, alcohol and addiction problems, mental health etc.
- J We welcome the points made at section 6.4 (page 41) of the draft policy document. In particular we welcome the emphasis placed upon avoiding apportioning unnecessary blame to parents for harm, which has occurred to their child or young person. We agree that in some cases, parents are powerless to stop harm occurring to their children, despite their best interests. Once again, we would welcome some practical examples here.
- J Research would show that parenting is physically and emotionally more challenging for women who are abused. The impact of domestic violence can be extremely damaging and can leave a mother emotionally and physically exhausted. Exposure to domestic violence over a period of time can leave a mother lacking in confidence in her ability to parent, low in self-esteem and confused as to how to best support and protect her children. We would welcome specific reference to domestic violence and its potential impact on parenting in this section.
- J Women's Aid Federation Northern Ireland strongly believes that if children are to be supported effectively, safeguarded from harm and provided with a range of opportunities to help them reach their full potential, then services supporting and empowering mothers to protect and support their children must be available at the

earliest possible stage. It is important for professionals to recognise the impact that domestic violence can have upon women's physical and mental health, and take steps to identify domestic violence and prevent it. It is important for HSCs to work in partnership with organisations such as Women's Aid to enable mothers who have experienced domestic violence to be referred onto effective and sensitive support interventions, including personal development programmes such as You and Me, Mum and Journey to Freedom programmes.

-) Given the points we have made, we therefore strongly agree that support should be offered to parents who are attempting to provide a positive parenting experience for their children. Parents need to be supported if they are to be effective in their attempts to safeguard and protect their children.

PROTECTION IN SPECIFIC CIRCUMSTANCES

Question 7:

Do you agree with the policy proposals in relation to protection in specific circumstances as set out in section 7 of the draft policy document? *(Please tick one option only)*

Yes

No

If no, please explain why and let us know how you think these could be improved.

Women's Aid Federation Northern Ireland (WAFNI) welcomes the comprehensive overview of abuse in specific circumstances provided at this section.

- J We particularly welcome reference to specific types of abuse experienced by girls such as Female Genital Mutilation at section 7.1.8 (page 46). We also welcome reference to forced marriages and honour based violence.
- J We welcome the comprehensive overview of sexual exploitation of children and young people provided on pages 47 and 48 and agree with the points raised including the fact that children and young people may not see themselves as victims of exploitation and as such, professionals must plan how to sensitively approach young people who are being sexually exploited or may be at risk of sexual exploitation to gain their trust and commitment. We also agree that abusers are often very skilled in manipulating and exploiting young people and can use a wide range of techniques to do so, including alcohol, affection, gifts etc.
- J We welcome the inclusion of all categories of children/young people with increased vulnerabilities and note the increasingly wide range of categories that fall under this heading. We particularly welcome the inclusion of children who have experienced domestic violence and abuse as a category under section 7.2 (page 50) of children/young people with increased vulnerabilities.
- J While we welcome the steps presented in the draft policy document to help professionals to deal with disclosures of domestic violence, we feel this short reference does not, in itself, provide sufficient overview of steps that can be taken to address domestic violence. In particular, we feel this section lacks a distinct emphasis on proactive and progressive approaches, which agencies can introduce to their practice. As it stands, this section focuses upon a reactive approach to domestic violence, which deals mainly with disclosure. There are many important processes and approaches which can be put in place, by agencies and organisations, to actively encourage disclosure and to promote the range of support services that are available including the 24 Hour Domestic & Sexual Violence Helpline.
- J We would like to see a stronger emphasis in this section on a more proactive approach to addressing domestic violence that goes beyond the reactive approach currently provided in this section. A proactive approach will ultimately include:

- Training for all professionals working with families to increase understanding of domestic violence as a safeguarding issue for children and young people.
- Greater public awareness of domestic violence and promotion of a zero tolerance approach.
- Provision of information, including posters, leaflets, helpline cards etc. relating to domestic violence support services, including Women's Aid refuges, advice centres and the 24 Hour Domestic & Sexual Violence Helpline.
- Effective interagency working including appropriate, timely referrals and information sharing.
- Promotion of keeping safe messages for children in schools and youth settings.

) We welcome the reference to MARACs in Northern Ireland and the reference to practitioner resources, protocols and templates etc. However we would wish to inform you that CAADA has now been renamed and rebranded and has become SafeLives. Information can now be accessed via their new website www.safelives.org.

) We welcome reference to children/young people's behaviours at section 7.3 (page 57) and the need to work with and support children who may be displaying these behaviours. We welcome the inclusion of bullying as a form of abuse and also self harm as a possible reaction to abuse.

) We completely endorse the need to listen to children and to respond sympathetically and in a non-judgemental or critical way. Women's Aid Federation Northern Ireland strongly believes in supporting and empowering all children and young people affected by abuse to protect them, help them to rebuild self esteem, address negative feelings and move on with their lives.

INTER-AGENCY WORKING AND INFORMATION SHARING

Question 8:

Do you agree with the draft proposals in relation to inter-agency working and information sharing as set out in section 8 of the draft policy? *(Please tick one option only)*

Yes

No

If no, please explain why and let us know how you think these could be improved.

Women's Aid Federation Northern Ireland (WAFNI) completely agrees with the draft proposals in relation to inter agency working and inter agency sharing as set out in section 8 (page 60) of the draft policy document. Children and young people in Northern Ireland will never be effectively safeguarded from harm unless there is strong and dedicated inter agency collaboration, including information sharing and effective communication.

- J We support the need for effective information management where safeguarding is concerned to promote efficiency and avoid unnecessary and potentially harmful delays. We appreciate the need to handle information carefully, sensitively and in line with the Data Protection Act 1998 and the need to have an information policy in place that complies with the DPA and the Human Rights Act 1998.
- J We completely support the need for sharing of information relating to safeguarding concerns in a timely and appropriate manner. This can prevent harm from occurring in the first instance and can also prevent harm from escalating if interventions are put in place as a result of effective information sharing.
- J We also understand the complexities of sharing information and welcome the reference to organisational procedures for staff and volunteers on how to share information in compliance with the DPA. We appreciate the need to develop good working relationships between agencies to build trust and encourage and maintain effective channels of communication.
- J We welcome the intention of DHSSPS to publish more detailed guidance relating to information sharing for child protection purposes.

TRAINING

Question 9:

Do you agree with the draft proposals in relation to training as set out in section 9 of the draft policy? (*Please tick one option only*)

Yes

No

If no, please explain why and let us know how you think these could be improved.

Women's Aid Federation Northern Ireland strongly believes that robust, comprehensive, child focused safeguarding training is essential for all those who work with children and young people (and their families) and can provide a strong foundation for the delivery of this policy.

- J While we agree with the draft proposals set out in this section regarding the provision of training, we believe a clear emphasis on training needs to be inherent throughout the whole document, including in the aims and principles at section 1. Safeguarding will not work unless staff and volunteers in all sectors have the necessary skills and confidence to identify and respond to abuse.
- J We welcome the development of a strategy for education and training, to be developed by the SBNI to provide a framework with different levels of training, depending upon roles and responsibilities.
- J We recommend an approach, which involves drawing upon the expertise of voluntary, and community organisations who are dealing with these issues at the front line and who have built up expertise over significant lengths of time through working with families who have been exposed to abuse.
- J We also recommend that organisations invest sufficient time in staff and volunteer engagement in such training to ensure it is a meaningful and not tokenistic approach and to enable them to fully consider all issues and the implications for practice. We strongly believe that clear guidance needs to be provided in the safeguarding strategy in relation to time commitments for training.
- J We particularly welcome the reference to multi agency training to identify areas of common relevance and to promote a clear understanding of roles and responsibilities.

EQUALITY IMPACT ASSESSMENT QUESTIONS

In this section of the questionnaire we are asking you to tell us if you think the draft policy promotes equality of opportunity in the Section 75 groups between persons:

- (1) Of different religious belief,
- (2) Of different political opinion,
- (3) Of different racial group,
- (4) Of different age,
- (5) Of different marital status,
- (6) Of different sexual orientation;
- (7) Of different gender
- (8) With a disability and persons without; and
- (9) With dependants and persons without.

Question 10:

Are the proposals set out in this consultation document likely to have an adverse impact on any of the nine equality groups identified under Section 75 of the NI Act 1998? (*Please tick one option only*)

Yes

No

If yes, please state the group or groups and provide comment on how these adverse impacts could be reduced or alleviated in the proposals.

EQUALITY IMPACT ASSESSMENT QUESTIONS

Question 11:

Are you aware of any indication or evidence – qualitative or quantitative - that the actions / proposals set out in this consultation document may have an adverse impact on equality of opportunity or on good relations?

(Please tick one option only)

Yes

No

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

Question 12:

Is there an opportunity to better promote equality of opportunity or good relations?

(Please tick one option only)

Yes

No

If yes, please give details as to how.

EQUALITY IMPACT ASSESSMENT QUESTIONS

Question 13:

Are there any aspects of the policy where potential human rights violations may occur?
(Please tick one option only)

Yes

No

If yes, please give details.

ADDITIONAL COMMENTARY

Please use the space below to provide any additional comments you may have in relation to the draft policy.

It would be helpful if you reference which part of the document you are commenting on. If you refer to any other documents, please provide the title, author and if possible approximate date of publication.

Women's Aid Federation Northern Ireland welcomes the production of Co-operating to Safeguard Children and Young People in Northern Ireland, a draft document for consultation.

We appreciate the opportunity to respond on behalf of our nine local groups. Underpinning our response is our overarching vision for children and young people who experience domestic and sexual violence and abuse as presented in our strategy for children and young people, **Our Place – Safe Space**:

“A future where all children and young people are safe and protected from domestic and sexual violence; where they have belief, respect for themselves and others and where their fundamental human rights are met.”

While we have no additional comments to make, we would wish to use this space to summarise the key points we have highlighted in our response:

1. Overall, Women's Aid Federation Northern Ireland believes there is a distinct lack of emphasis on working directly with children and young people to increase their understanding of risk, to promote key safeguarding messages and to equip them to access support when necessary. We believe this is a fundamental flaw in the draft policy document and would urge you to review the document to ensure a focus on engaging with children and young people in preventative education throughout the document. In particular, we would strongly suggest the inclusion of an additional aim at page 7 and an additional principle on page 10 to emphasise the importance of empowering children and young people through preventative education approaches to feel safe and access support interventions when required.
2. We believe there are additional UNCRC rights, which could be presented at section 1.4 (page 8) which are relevant to this policy. We have outlined these at question 1 of our response. While we understand all 41 rights in the convention cannot be listed, we do feel these are particularly relevant to this policy and set the necessary overarching children's rights context, ensuring a child centred, rights based approach from the outset.
3. We question why the reference to domestic violence has been omitted in the definition for emotional abuse in the new draft policy document. We recommend either reverting back to the original 2003 definition or providing an additional statement in relation to domestic violence and its impact upon children and young people in this section.

4. In relation to reference to Health and Social Care Trusts provided at section 3.1.2 (page 16) of the draft policy document, we would welcome a stronger reference and perhaps some relevant examples of how HSCTs work in partnership with the community and voluntary sector. In relation to reference to the role of Social Workers provided at section 3.1.4 (page 17) as the lead professionals for safeguarding children and young people. We would welcome, once again, a stronger reference in this section to the importance of Social Workers working in partnership and in close collaboration with other agencies, including the voluntary and community sector.
5. Women's Aid Federation Northern Ireland would welcome reference to the importance of routine enquiry in relation to domestic and sexual violence for all health professionals, including midwives, health visitors GPs etc.
6. We wish to see a more comprehensive and accurate overview of the role of the voluntary, charitable, faith and community-based organisations at section 3.6 (page 23). We feel this short reference does not fully encompass or give credit to the vital role the voluntary and community sector (CVS) plays in safeguarding children and young people.
7. At section 4.5.3, where there is reference to organisations which provide services to adults. This section highlights the need to be alert to risk of harm to the children or young people in the care of adults to whom they are providing services. We would welcome a specific reference to domestic violence in this section as a clear example of a situation where risk posed to an adult may also present risks to children.
8. While we welcome the steps presented in section 7.2 (page 50) of the draft policy document to help professionals to deal with disclosures of domestic violence, we feel this short reference does not, in itself, provide sufficient overview of steps that can be taken to address domestic violence. We would like to see an emphasis on a more proactive approach to addressing domestic violence that goes beyond the reactive approach currently provided in this section.
9. We would like to see the importance of training emphasised throughout the entire document including in the policy aims and principles. Training is essential for all those who come into contact with children, young people and families who may be at risk. We believe training provides the necessary foundation for the delivery of this policy and is crucial for all those who work with families if they are to respond to safeguarding concerns with confidence and understanding.
10. Finally, we welcome the development of a strategy for education and training, to be developed by the SBNI as referenced at section 9.2 (page 62) of the draft policy document. We wish to emphasise the need to draw upon the expertise of voluntary, and community organisations who are dealing with these issues at the front line and who have built up expertise over significant lengths of time through working with families who have been exposed to abuse. We also recommend that organisations invest sufficient time in staff and volunteer engagement in such training and we strongly recommend the development of clear guidance in the safeguarding strategy in relation to time commitments for training.