

About the RCPCH and our response

The RCPCH works to transform child health through knowledge, innovation and expertise. We have over 500 members in Wales, 14,000 across the UK and over 17,000 worldwide. The RCPCH is responsible for training and examining paediatricians. We also advocate on behalf of members, represent their views and draw upon their expertise to inform policy development and the maintenance of professional standards. We are grateful for the opportunity to respond to this consultation and have provided our top-line feedback below which we hope will be helpful.

For further information please contact Lisa Roberts, Policy and Public Affairs Officer for Wales via lisa.roberts@rcpch.ac.uk

Background / purpose of consultation

This consultation seeks views on statutory guidance which aims to create a Single Unified Safeguarding Review (SUSR) process for Wales.

This process will simplify the review landscape in Wales by combining Adult Practice Review, Child Practice Review, Mental Health Homicide Review, Domestic Homicide Review, and Offensive Weapon Homicide Review processes. The statutory guidance will replace Working Together to Safeguard People Volumes 2 (Child Practice Reviews) and 3 (Adult Practice Reviews). As a result, any consequential changes to Volume 1 (Introduction and Overview) will be made to reflect this.

Our feedback

The Royal College of Paediatrics and Child Health (RCPCH) welcomes this opportunity to respond to Welsh Government's consultation on proposed statutory guidance on the Single Unified Safeguarding Review (SUSR) process. We welcome any initiative which strives to improve the safeguarding of vulnerable children, the protection and promotion of children's rights, child protection per se, and outcomes for vulnerable children. For those reasons, we are pleased to see this work going ahead.

In considering our response, we have engaged with our key designated doctor in Wales, Dr Claire Thomas, our UK-wide Officer for Child Protection, Professor Andrew Rowland, our Officer for Wales, Dr Nick Wilkinson, our Policy Manager for Child Protection, Elizabeth Fussey and our Head of Devolved Nations, Gethin Matthews-Jones. Collaboratively, our team includes people with expertise in child health, children's rights, safeguarding vulnerable people, public policy development, and academic research.

In addition, our key designated doctor in Wales sought opinions from Named and Designated Doctors in Wales via engagement with the All-Wales Safeguarding Group.

In this response, we will set out the recommendations and specific comments which we would like Welsh Government to consider when revising this draft statutory guidance.

Overall reflections

We consider that the repository that would be created through introduction of this statutory guidance is likely to bring significant improvements for families, groups of communities, and the system. In addition, we believe that the repository will lend itself to significant improvements in research and policy development in the themes and topics identified by interrogation of the cases submitted.

From a public health point of view, having a central repository with such a rich source of information pertaining to the wide range of cases that will be considered by this new process, it's likely to bring significant opportunities for consideration of new public health strategies to try to prevent or earlier identify the situations which underpin the cases whose details will be collected by this repository. From a public health research point of view that therefore presents a really important opportunity for future research to take place (of course through the correct approvals process).

Overall, we consider the document to be overly complicated. We believe it would be helpful to the system, to practitioners, to families, and ultimately to children (who of course have the right to have information presented to them in a way that they can understand) for this statutory guidance to be written in a more simplified way (which much clearer flow charts and with fewer words) so that, potentially, the system, practitioners, and families could be engaged through the same guidance document, rather than needing separate documents for each group or groups. Aside from this current document we think that is a principle that could usefully be applied to future statutory guidance: fewer words, more flow charts (which are made as clear and simple as possible), and clear diagrams.

Specific recommendations

We set out below a series of specific recommendations which we consider will add benefit, weight, and utility of both the repository and the review programme that would be created if this new statutory guidance is implemented.

Ensuring children are seen and heard.

Article 12 of the United Nations Convention on the Rights of the Child says that every child has the right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously. This principle recognises children and young people as actors in their own lives and applies at all times throughout a child's life¹.

¹ <https://www.coe.int/en/web/children/the-united-nations-convention-on-the-rights-of-the-child>

Whilst the RCPCH can see the benefits of taking a family-first model when considering wrap-around safeguarding practice, it is important that this does not inadvertently result in children and their voices being missed from safeguarding reviews, and that individual needs are considered.

Key points to highlight:

- In principle this statutory guidance is a good idea
- The implications of the statutory guidance could bring with them unintended adverse consequences as one size does not necessarily fit all
- Richer data and the potential for wider aspects of safeguarding the child needs to be considered further.
- The process seemed to be a little generic and that the child element of this may not get as much time.
- Children and young people have not been considered therefore will be lost in this model. We need to ensure that they are central to the review process and that the themes and services available for them are adequately highlighted.
- We think there should be an opportunity for additional information to be provided specifically about and for children and young people, rather than it all being written within one document.
- We would welcome a chapter on children and young people as it is key that their voices are heard in the safeguarding reviews.
- We feel that all protected characteristics (Equality Act 2010) need to be considered throughout all cases as we believe all areas to be relevant.
- Although not a protective characteristic, suicide and the implication of suicide also needs to be considered for all parts of the different reviews.

Resourcing Multi-agency working

National safeguarding panel reviews in both England and Wales have shown us time and time again that effective multi-agency working is at the heart of successful safeguarding models, and so we welcome the approach taken by the SUSR to offer shared solutions. However, it is important that this is appropriately resourced so that organisations have the time and facilities to handle every case with due diligence.

Key points to highlight:

- We welcome the proposed multi-agency repository. We consider this resource to be positive in terms of information as it will look at all core features and try to combine all reviews going forward. This has the benefit of looking at safeguarding from a family perspective (i.e. family around the child / adopting family unit around child / team around the child)
- The College are keen that the voices of its members are heard with the review process. Where there are children involved there needs to be a paediatric involvement / input.

- At present, things are not going very well and there needs to be a mechanism in place by way of a clear proposal to build in this paediatric involvement and input.
- Our members feel that the review process has to be resourced and funded appropriately. We understand that it is difficult to find chairs and authors for the review processes across Wales and we have concerns about resourcing of initiatives, We would like to receive assurance about how these proposals would be resourced in the future.
- There needs to be a clear proposal as to how these chairs and panel members are sourced, resourced and trained,

Independence and Appeals

With any safeguarding system, it is important to consider the mechanisms in place to prevent mistakes or missed opportunities, and the mechanisms in place to address issues which may arise. The RCPCH would like to highlight the importance of robust governance, independent reviewers, regular training, and a clear judicial process when disagreements arise.

Key points to highlight:

- Our members feel that Chairs being independent is important. Best practice would be to employ independent Chairs from the public sector but due to the lack of funding for safeguarding boards in Wales currently this is difficult to achieve.
- Our members recognised it was problematic identifying people due to the level of work (on top of their day job) and the lack of funding therefore it was important for people to be identified and trained.
- In terms of the reporting process, exception reporting needs to be utilised to affect change. If policy continues having someone to review against it, this could potentially cause disputes between families and professionals.
- We welcome the development of a central repository. Our members agreed that reporting on themes nationally is positive. However, there are assumptions that all reviews are published but they are not, therefore this needs to be highlighted.
- Our members recognised that the biannual themed events and training are important as having these mechanisms in place would effectively address issues which may arise in the future.
- We consider partnership involvement and governance structures going forward to be key, our members feel that there is a need to ensure that evolution is used.

We would welcome the opportunity to work further with you on this in the future. Should you wish to discuss these issues directly with paediatricians, please contact please contact Lisa Roberts, Policy and Public Affairs Officer for Wales via lisa.roberts@rcpch.ac.uk