

Submission to HIQA on a Scoping Consultation to inform the development of Draft National Standards for Children's Social Services

September 2019

Question 1: Are you taking part in the consultation as:

- an individual
- on behalf of an organisation

(Please provide your contact details or organisations details if appropriate)

Question 2: Are you commenting as:

- a person who has used or is currently using children's social services
- a staff member or other person working in children's social services
- Other:

(Please specify your role)

Director of Children's Services, Barnardos

Question 3: What are the key areas that the draft national standards should address?

(Please indicate why they are important)

In preparing this response, we have reviewed the standards already in existence and the themes that are set out under each. The draft National Standards could take a similar approach as there is consistency in the principles across each of them. However, as these new standards will cover a number of different types of services they will need to balance a holistic approach to be adopted by all, versus addressing specific issues relating to only one type of service (e.g. residential care).

The development of the standards should be informed by the following guiding principles:

- Children and young people accessing services covered by the National Standards should have their rights, as provided for under the UN Convention on the Rights of the Child realised. The standards should be cognisant of issues of equality, diversity and culture. They should reference the practical realisation of these concepts in the development of, for instance, a human rights and equality action plan. In this instance the standards could direct services to the [Irish Human Rights and Equality Commission](https://www.ihrec.ie/guides-and-tools/human-rights-and-equality-for-employers/developing-a-human-rights-and-equality-action-plan/) (<https://www.ihrec.ie/guides-and-tools/human-rights-and-equality-for-employers/developing-a-human-rights-and-equality-action-plan/>) website for further guidance on the development of same.
- All services covered by the National Standards should have a child centred approach; there should be explicit reference in the standards to decisions being made with the best interest of the child/children rather than the service, agency, individual workers / carers.
- There should be a clear focus on a whole child approach which takes into consideration the physical (body); emotional regulation/feeling (heart) and mind. Opportunities should be created so that a child's overall wellbeing is a constant focus in a child's life. For example, nutrition, sleep, anxiety, play, relationships, attachments, social needs, physical, emotional, mental health needs, need for safety and security, education, spiritual needs are all factors that need to be considered. Adverse childhood experiences should be considered and service responses should respond sensitively to these.
- In order to meet the holistic needs of the child a multi-agency approach is needed. The standards should include reference to the use of a collaborative and multi-agency approach. Such an approach should be accessible and seamless, with potential blocks and barriers identified and resolved.
- The meaningful participation & involvement of children, parents, families, staff and organisations should be included at every level of service planning, delivery and evaluation. The participation of these groups should ensure that they have a voice and clear role in strategic planning and in decisions that affect them in the short, medium and long term. Participation should be embedded across the standards and in their development (see Barnardos response to question 5).

In developing and referring to service delivery the following aspects should be included:

- At the core of all service delivery should be the prevention of family breakdown. However, if this does occur there should be a focus on family reunification or meaningful family contact. This should be a common goal included in the standards that all services and agencies should work towards.
- The standards should provide clarity on the expected supports for the families, clear guidance and direction to how the expectations of the roles and responsibilities of the agencies involved are captured. Suggested points to be included would be working to a timeline for the family's best interest, providing opportunities for the families to engage, clear reviews and response times.
- The standards should place an emphasis on the importance of delivering a service which is tailored to the needs of the child based on the findings of thorough assessment. The assessment should consider things like - clear time-lines, roles, responsibilities, response times and clarity for all in terms of decision making. In addition, the standards should refer to the need to measure outcomes to indicate whether or not the child and family's needs have been met by the plan put in place.

- In order to maximise the outcomes achieved, a range of evidence-based services/interventions that are capable of meeting individual needs should be offered to children and their families.
- At all levels across service delivery there is a need for communication which is clear and concise. Decision making processes should be consistent and.
- Services should be accessible in terms of distance, financial burden, not clash with working times, and home based where suitable. Services should also be accessible to those where there may be a language barrier, and should lend themselves easily to be suitably adapted if necessary. Similarly, all services should be inclusive of and account for children and parents varying levels of ability.
- The environment where services are delivered should be welcoming, nurturing safe trusting place spaces for children and their parents to enter.
- Children and parents should understand the services they are being offered, why and provided with opportunities to consent and engage meaningfully.
- Services and responses should be offered in a timely manner with due regard given to how best to intervene with maximum impact and to minimise the impact on the child.

Service delivery will only be as effective as the human resources behind it, and therefore the standards should incorporate the following elements with regard to the workforce:

- The standards should emphasise the need for clear policies and guidelines for the recruitment and selection of staff and volunteers. For example, recruitment should focus on ensuring a high quality workforce through the establishment of an agreed skill set and vetting processes needed.
- Developing a high quality workforce means ensuring that there are opportunities for continuous professional development. The National Standards should refer to:
 - the need for formal and informal professional development, supervision, team meetings, reflective practice, peer development, training, induction, reading, mentoring, and coaching,
 - the need for individual/group training plans and pathways,
 - the development of a culture of professional support and personal self-care practices which could include employee assistance schemes, team days, mindfulness and wellbeing events for staff,
 - development of a learning culture, creating a safe environment to learn from mistakes, involving staff, children and parents in this process,
 - undertaking skills audits, developing a system of regular staff appraisals and development plans.

The standards should make explicit reference to risk. Risk management has a number of different aspects and is always fluid. The standards should consider the measurement of risk with regard to current and historic risks including:

- **Physical buildings:** Clear risk assessments need to be in place in terms of the safety of the buildings that children are attending services or in some cases living in. This will include health and safety legislation (including fire safety) and clear health and safety statements, safe care practices, fire procedures and other natural disaster plans.
- **People management:** rigorous vetting and reference checking at recruitment stage, as well as accessible and robust comments & complaints mechanisms.
- **Behaviours:** Risk taking behaviours may require exploration or risk assessments.
- Thresholds are clearly named and monitored.

- **Multi-agency:** Clear what the role of each agency is in relation to risk management, for example managing risk or sharing information.

The National Standards should make specific recommendations with regard to governance. This includes referring to the need for internal and external governance. Regular evaluations in relation to practice and management of events, behaviours and recognition of good work should be undertaken. Other governance issues also include:

- **Information:** Clear guidelines on the use/retention of information and consent. Ensuring that those whose information has been gathered have a role and understand their rights in relation to same.
- **Recording of information:** what is being recorded, why it is being recorded and how it is used. Ensure positive aspects of children's lives are recorded and significant events are both positive and challenging events that occur. Children's and parents voices are heard and recorded.
- **Resources:** Every child should have the same opportunity and access to resources. The standards should refer to the need for clear guidelines on how resources are identified, prioritised and allocated.
- **Crisis management:** Clear plans should be in place to review significant events in order to establish what worked and what didn't. There should be a child centred approach in relation to crisis. Learning and development should have a crisis element in relation to preparation and review.

Question 4: What are the key sources of evidence and information that we should review to inform the development of the draft national standards?

(Key sources could include the titles of national and international peer-reviewed literature, policy, legislation, standards, tool-kits, guidelines and guidance)

Sources of evidence and information that inform the development of the draft national standards should include best practices recommendations. However, in developing the standards HIQA should also review documents and reports highlighting where practice and standards have failed. For example individual (<https://www.tusla.ie/national-review-panel/individual-reports1/>) and annual reports (<https://www.tusla.ie/national-review-panel/individual-reports1/>) from the National Review Panel (<https://www.tusla.ie/national-review-panel/>).

EPIC has published a wide range of reports (<https://www.epiconline.ie/topics/publications/research-reports/>) on young people's advocacy which provide valuable insights into young people's experience in care.

The principles of a Trauma Informed Care approach to the delivery of social services should also be considered.

Some resources include:

- Child development and trauma guide. Government of Western Australia <https://www.dcp.wa.gov.au>
- Concept of Trauma and Guidance for a Trauma-Informed Approach. Substance Abuse and Mental Health Services Administration <https://www.nctsn.org/>

Question 5: What key organisations or individuals, within this sector, should we engage with when developing the draft national standards?

(We may invite them to take part in future focus groups or to comment during the public consultation on the draft national standards)

It is critical that all of the main stakeholders should be included in the development of the draft national standards in order to ensure a wide range of perspectives are gathered and considered in the finalisation of the standards. With regard to the latter it is recognised that there may be competing priorities from different stakeholder views however, these should be worked through in order to ensure that the services provide the best possible outcomes for the children and young people accessing them.

Children and young people's voices and experiences should be at the centre of the development of the standards. In particular the consultation process should target 'seldom heard voices'. Such a term refers to those children and young people who have less opportunity to participate or have their voice heard. This may be due to greater obstacles to participation that do not exist in other cohorts of the population (examples include children with housing or family issues or those from minority groups). The inclusion of such cohorts of the population can be more challenging as they may require greater support, however, organisations such as Barnardos have extensive experience in such approaches. Examples of Barnardos work in this area include:

- The implementation of a children and young people's participation policy which highlights why and how Barnardos meets its commitments to children's and young people's participation across the organisation. Children and young people's participation has become part of the way we work rather than a separate isolated exercise.
- From 2012 to 2015 our Amplifying Voices project developed an effective model for supporting young people's participation which could be replicated by other organisations.
- In 2018 the Barnardos' Glór na nÓg project ensured that the voices of children and young people who come to Barnardos services were included in our Budget 2019 campaign. This was achieved through the development and piloting of a method of engagement in advocacy work through a number of workshops with children and young people.

Further guidance on engaging with seldom heard voices is available from the Department of Children and Youth Affairs toolkit which was based on Barnardos Amplifying Voices project.

- A Practical guide to Including Seldom-heard Children and Young People in Decision-making - <https://www.comhairlenanog.ie/wp-content/uploads/2014/10/Seldom-Heard-toolkit.pdf>

The participation of children and young people and the inclusion of seldom heard voices, in this consultation process should be realistic but meaningful. Through collaboration with representative organisations (such as EPIC; YAP; Comhairle na nÓg and others) participation can be facilitated. Consideration should be given to whether a child or young person should participate in any steering group that is set up or whether a separate children and young people's reference group should support the development of the standards. At a minimum, and / or in addition to this, a separate consultation exercise (such as a focus group or survey/questionnaire) should be undertaken.

The Ombudsman for Children's office has in the past conducted consultations with children and young people on sensitive issues such as their experience with homeless services (No Place Like Home <https://www.oco.ie/app/uploads/2019/04/No-Place-Like-Home.pdf>), mental

health services (Take My Hand - https://www.oco.ie/MentalHealthReport_2018.pdf) and could offer guidance, expertise and learning from this perspective.

Both the Department of Children and Youth Affairs and Tusla have policies and strategies to guide the participation of children and young people (link to documents). Also link to Hub na nÓg. Resources that may be of use to HIQA in the engagement of children's voices include:

- National Strategy on Children and Young Peoples Participation in Decision Making 2015-2020 published by the Department of Children and Youth Affairs - <https://www.dcy.a.gov.ie/documents/playandrec/20150617NatStratonChildrenandYoungPeoplesParticipationinDecisionMaking2015-2020.pdf>
- Tusla's Child and Youth Participation Strategy (2019 -2023) (https://www.tusla.ie/uploads/content/tusla_child_and_youth_participation_strategy-2019-2023.pdf) and Toolkit - ([https://www.tusla.ie/uploads/content/Tusla_-_Toolkit_\(web_version\).pdf](https://www.tusla.ie/uploads/content/Tusla_-_Toolkit_(web_version).pdf))
- Hub na nÓg (<https://www.hubnanog.ie/>) and Tusla's web page on participation resources (<https://www.tusla.ie/services/family-community-support/resources-to-support/>)

Parents' and guardians' views should also be included in the development of the standards. This can be facilitated through organisations such as Barnardos or other representative bodies. Listened to but not being heard

In addition to this, it is critical that statutory bodies who have a remit within the delivery of services that interact with or are directly related to those covered by the National Standards. This includes government departments – Departments of Housing Planning and Local Government; Health; Children and Youth Affairs – agencies and services – TUSLA; HSE services such as Child and Adolescent Mental Health Services (CAMHS); disability services and the Dublin Region Homeless Executive.

Voluntary and representative organisations with knowledge and expertise in this area who should be involved in the consultation include – Irish Foster Care Associations, EPIC (representing young people in care), Crosscare, Salvation Army, and various different homeless charities who deliver services in this area. Private foster care providers should also be included in the consultation process.