



Lanyon Building, Jennymount Business Park, North Derby St, Belfast BT15 3HN

028 9035 1135 [nspcc.org.uk](http://nspcc.org.uk)

Submission by the NSPCC in  
Northern Ireland to the OFMDFM  
Committee on the Children's  
Services Co-operation Bill

March 2015

**EVERY CHILDHOOD IS WORTH FIGHTING FOR**

National Society for the Prevention of Cruelty to Children (NSPCC). Royal Patron: Her Majesty The Queen. President: HRH The Countess of Wessex.  
Founded in 1884. Incorporated by Royal Charter RC000374. Registered charity number 216401 (England and Wales) and SC037717 (Scotland).

## Introduction

NSPCC is grateful for the opportunity to respond to the Children's Services Co-operation Bill; we welcome the proposed legislation and commend the Steven Agnew and OFMDFM Committee's interest in this particular area. We have noted a number of general and specific suggestions to the committee highlighted in bold.

The NSPCC is a leading child protection NGO in Northern Ireland providing a range of local evidence-based therapeutic and protection services for children and young people. The NSPCC has legal child protection powers under the Children (NI) Order 1995; and in addition to our statutory membership of the Safeguarding Board for Northern Ireland (SBNI), we are also a member of Public Protection Arrangements Northern Ireland (PPANI).

NSPCC delivers a range of pioneering evidence-based therapeutic and protection services directly to children and young people and their families who have experienced sexual abuse; or have domestic violence and mental illness in families. Our services include the 24/7 NSPCC Helpline for anyone concerned about the welfare of a child, and we provide support for all children and young people through ChildLine via telephone; e-mail or online, 24 hours a day/365days a year. NSPCC also provides advocacy and support for vulnerable victims and witnesses who have to go through the trauma of giving evidence in criminal trials.

## General and specific comments on the Bill

We are particularly interested in the matter of cross-departmental co-operation in relation to children and we view Clause 1 of the Bill (the General Duty) as part of a mechanism for strengthening cross-departmental collaboration. Our experience is that where a policy issue crosses several government departments and their remits, it becomes increasingly difficult to progress in terms of determining leadership and priority.

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By way of example, internet safety is one such cross-cutting policy issue with no clear government lead, with responsibility falling across a range of stakeholders. Progress in taking forward a cross-government strategy has been limited, even in terms of joining up what government activity has occurred and providing an analysis of where policy gaps exist.

Additionally, it has been increasingly difficult to establish a government department to lead on the issue of Female Genital Mutilation (FGM). This is an emerging issue across the UK, it

is a severe form of child abuse which deserves adequate priority. While each jurisdiction in Great Britain has developed an action plan, progress in NI has been slow. The policy area falls between the Departments of Health, Education, Justice, OFMDFM and the Department of Finance and Personnel. It is also a multi-professional issue and it has been difficult to identify a strategic lead in this area.

The NSPCC supports the 6 high level outcomes for both the basis of co-operation and the interface with operational planning. **We strongly suggest the need for the development of statutory guidance to underpin the creation of actions plans and outcome measures and suggest a provision for this in the Clause.** This would help with the detail of the action plan and creation of clear outcome measures.

The Clause is silent on penalties for non co-operation and has no sanctions regarding limited compliance. **We suggest that the Committee looks at this issue considering the development of further provision to avoid a simple tick box exercise or a situation where departments continue to operate as prior to the enactment of the proposed legislation.**

In terms of mechanisms and structures we strongly support the creation of a structure to facilitate dialogue on children's policy development between the NGO sector and the government on the development of children's policy. **We suggest the development of a**

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statutory forum such as the NGO forum, hosted by OFMDFM which has worked well in the past. It would be helpful to consider a requirement placed on government departments to meet formally with the NGO sector annually to look at children's policy development.

## Clause 3

We are supportive of pooled funding arrangements reflecting current arrangements on a number of cross-departmental projects.

## Clause 4

The Provision is silent on The Children Order (1995 Order) (Amendment) (Children Services Planning) Order (Northern Ireland) 1998 on which it is based. If agreed the 1998 Order would need to be repealed.

In relation to Clause 4 7 (d) we strongly suggest the amendment of this provision. NSPCC provides a range of services which are not commissioned by the (spell out HSC in full) Health and Social Care Board operate independently. Examples include ChildLine and Helpline and a range of regional NSPCC services around therapeutic interventions; which do not feature in current Children's Services Planning. We also provide a range of services commissioned or funded by departments other than DHSSPS and the Regional Health and Social Care Board; such as the Young Witness Service and the Child Protection in Sport Unit. We recommend removing the words 'were **they to be provided by the Regional Board**'. This rewording would leave for a more flexible approach to the inclusion of key services such as ChildLine in Children's Services Plans.

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References to the Department in this provision would **need to include a provision in the interpretation section to make clear it is the Department of Health, Social Services and Public Safety.**

NSPCC would be happy to give oral evidence on our submission in relation to the Committee's scrutiny of the Bill.

Colin Reid, Policy and Public Affairs Manager

[colin.reid@nspcc.org.uk](mailto:colin.reid@nspcc.org.uk)

Orla O Hagan, Policy Officer [orla.ohagan@nspcc.org.uk](mailto:orla.ohagan@nspcc.org.uk)

Caroline Cunningham, Senior Policy Researcher

[caroline.cunningham@nspcc.org.uk](mailto:caroline.cunningham@nspcc.org.uk)

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