

By email: childabuse@nice.org.uk

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ADCS response to the NICE guideline on child abuse and neglect

General commentary

The Association of Directors of Children's Services Ltd (ADCS) welcomes the opportunity to comment on the draft National Institute of Clinical Excellence (NICE) child abuse and neglect guideline. ADCS is the professional leadership association representing directors of children's services and their senior management teams in local authorities across England. This document should be read as an official response to the NICE consultation. A supporting appendix accompanies this submission. Where comments refer to specific paragraphs or sections in the draft document, this is indicated for convenience.

NICE was tasked by the Departments for Education and Health in 2014 to produce a guideline on abuse and neglect for professionals working with children and young people across schools and early years, social care, medical centres and custodial settings. It encompasses physical, emotional and sexual abuse, including sexual exploitation, child trafficking and forced marriage, as well as neglect. Given the scope, size and complexity of the topic, this group of practitioners is plainly too broad. Even within the remit of children's services, the needs of the workforce differ greatly depending on levels of contact with children and the significance within individual roles of work with those who have been abused and/or neglected. While advice on recognition is applicable to all practitioners, information on assessment is only relevant to those with more specialist roles. These guidelines would be more user friendly if organised to reflect these differences and/or broken down into a series of 'bite sized' guides.

There seems to be little recognition that the standard NICE methodology of identifying questions, undertaking a literature review and forming guidelines based on the resulting evidence is not suited to the task in hand. Sadly, the draft guidelines are not well grounded in the significant amount of guidance and good practice advice that already exists in this highly-contested area of policy and practice. More could, and should, be done to build on sources practitioners are familiar with, most notably Working Together. The various versions of Working Together, particularly the 2010 iteration, covers good practice in working with vulnerable children and young people including the identification of abuse and neglect, principles for working with children and families and much, much more.

At 581 pages, plus several supporting annexes, this guidance is overly long - between 2010 and 2013, Working Together was streamlined from 700+ pages to 100 or so in an effort to make it more accessible to frontline practitioners. In addition to Working Together, approximately 50 statutory and/or practice guidance notes from the Departments of Education and Health, the Ministry of Justice, the Home Office, the Foreign and Commonwealth Office plus Public Health England, the General Medical Council and others (including NICE) are in circulation. They deal with everything from general child protection principles to responses to specific safeguarding issues, including trafficking, domestic violence, female genital mutilation, sexual exploitation and forced marriage.

It is obvious that a great deal of work has gone into producing this guideline, however, in its current form, it is difficult to see how it can have a significant impact on practice. The literature review is extensive yet the limitations of the evidence base used, much of which is drawn from the United States, is not recognised. Similarly, the guideline does not seek to address this deficit via the use of wider expert opinions. This is a missed opportunity and could have added value to this work - there is a dearth of research around perpetration, for example. Greater clarity is needed about who exactly the guideline is for and further consideration should be given to the ways in which practitioners might use it. ADCS would welcome a clearer focus on the centrality of relationships in work with children and families, better contextualisation of the recommendations, including how they relate to existing guidance, and recognition given to the resource

constraints on all agencies working with children. Greater weight should also be given to UK-interventions which are more readily accessible to practitioners and commissioners in the final version of the guidelines.

Finally, it is worth keeping in mind that the Department for Education is about to begin a review of Working Together in light of wide ranging plans and developments included in the Children and Social Work Bill (CSWB). Similarly, the outcome of the government's consultation on the mandatory reporting of abuse and neglect is still awaited and should be factored in here once available.

ADCS would welcome further discussions with NICE on the content of this response and would welcome a discussion at a forthcoming meeting of the Association's Families, Communities and Young People Policy Committee. Please contact Katy Block, ADCS Policy Officer via katy.block@adcs.org.uk to arrange.

Appendix 1

Specific comments on the NICE guideline: short version

The draft does not seem to deal with the application of this guidance into practice e.g. in section (1.2) on recognising abuse and neglect, several lists of 'symptoms' are offered without any development of how these might be used. The section on telling others about abuse and neglect (1.2.1) does not sufficiently recognise the centrality of trusting relationships in the disclosure of abuse, particularly sexual abuse, by children and young people. One study by the NSPCC in 2013 found that disclosure was delayed on average by 7.8 years from the start of the abuse. It would be helpful if this was addressed in the guidance via greater emphasis on developing relationships with key workers/professionals.

Some of the behavioural indicators of neglect (1.2.25-27) seem overly simplistic and leave little room for the consideration of factors outside of the parent/carers immediate control e.g. poor quality housing, insecure employment, benefit sanctions etc. It is noted in passing that professionals may find it difficult to distinguish between neglect and material poverty, if, for example, a child is "dirty and smelly."

In (1.2.9) the list of parental risk factors for abuse and neglect is broad and lacks enough detail to be of value to practitioners who suspect a child's welfare is at risk.

In the assessment section (1.3), there is little or no reference to the existing assessment guidance for social workers (or indeed guidance for other professionals), to assessment tools, planning interventions or reviewing impact. This is surprising. If little evidence was found in the literature search, best practice advice from experts would be a helpful addition here. The lists of characteristics would be more useful to practitioners if supplied alongside an analytical framework or if weightings were attached to specific risk factors.

Early help (1.4.1) refers to home visiting programmes without naming any specifics yet the section on parenting does identify specific programmes which is more helpful. (1.4.9) says: "Consider a planned activities training programme, with or without mobile phone support, for vulnerable mothers... of pre-school children," who is this aimed at, which programme, what does the research say about its content?

Responses and support for children and young people after abuse (1.5.3), who is this list of actions aimed at? Why is the domestic violence section only addressed at the police (1.5.4)? (1.5.5) Why are the suggested responses listed here e.g. provide safe accommodation, only about child trafficking?

It is unclear why the therapeutic interventions for children, young people and families after abuse and neglect (1.6) deals with children living in the family home or with foster carers but not in residential care settings, including children's homes and supported lodgings.

Who are the recommendations on therapeutic interventions (1.6.4) addressed to and which attachment based interventions does the guideline refer to? Where is parent child psychotherapy available (1.6.6), what are the benefits or successes of this pathway? Has the NHS ever commissioned this in England? It is unclear who the therapeutic suggestions listed in (1.6.8) are aimed at - from a practitioner/commissioner perspective some discussion of availability, cost etc. would be both relevant and welcome.

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It is unclear why the guidelines refer only to girls who have been sexually abused and who are showing signs of emotional or behavioural disturbance (1.6.17). A 2014 study by Barnardo's suggested that 33% of referrals to CSE services involved boys and young men.

The 'planning and delivery' section (1.7.3) references 'less well-recognised forms of abuse, including child sexual exploitation (CSE), female genital mutilation (FGM), forced marriage and child trafficking,' this might be better phrased as 'emerging and evolving threats,' as the sector's knowledge and understanding of these risks has increased significantly since the guideline was originally commissioned. However, the guideline is largely silent on the signs and symptoms of online grooming and exploitation which is a growing issue, as is radicalisation. ADCS members highlighted the lack of focus on schools as a particular concern given their vital role in the early identification of issues and the provision of support to children and their families – they are the eyes and ears of children's social care.

Terms used in this guidance (page 29 onwards) - the Home Office published an updated definition of CSE earlier this year, it would be helpful if the final guideline reflected this to avoid any confusion. Similarly, reporting of suspected FGM cases is now mandatory, again, it would be helpful if this was reflected here. The definition of 'parent or carer' does not seem to recognise the status of adopters and the definition of foster carers seems to explain their status largely in monetary terms, this is unhelpful.

The context section (page 36 onwards) seems to omit reference to several key changes in the design and delivery of children's services. Local safeguarding children boards (LSCBs) are referenced as are serious case reviews (SCRs), yet under the CSWB, which is expected to receive royal assent in the coming weeks, neither will exist in the future. Further, the CSWB will put sex and relationships education on a statutory footing for the first time. Equipping children and young people with knowledge and courage to recognise the signs of abuse should be central to prevention. It is important that national guidance of any kind is responsive to legislative and policy changes. The pace and scale of change in children's services in recent years is significant, see [here](#) and [here](#).

The planning and delivery of services is dealt with in Working Together and sits within the remit of multi-agency safeguarding arrangements (currently LSCBs).

The recommendations for further research are helpful and would sit well with a section which considers the current weaknesses and limitations of the evidence.