



Llywodraeth Cymru
Welsh Government

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Welsh Government
Consultation Document

Single Unified Safeguarding Review Statutory Guidance

Learning from the past to make the future safer

Date of issue: 6th March 2023

Action required: 9th June 2023

Mae'r ddogfen hon ar gael yn Gymraeg hefyd /
This document is also available in Welsh

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Overview

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

The SUSR is a unique and groundbreaking example of how, through collaboration and co-production across political, organisational, and geographical boundaries, we can tackle a complex problem and deliver a shared response. Almost 200 stakeholders have been engaged in the design and delivery of the SUSR, all of whom have put the person who has been harmed, their families and communities first. This transformation supports our one public service ethos, creates a stronger culture of accountability, and dispersed leadership empowering people to share learning.

The SUSR lays out a framework for how Regional Safeguarding Boards should work with Community Safety Partnerships and other partnerships in the area such as Public Service Boards and Regional Partnership Boards to protect people from harm - sharing lessons and ensuring we work together to secure the wellbeing of every person in 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.

How to respond

You can respond to this consultation in the following ways:

- complete our online form
- complete the consultation response form at the back of this document and return it to us by email to: SUSRWales@gov.wales or by post to:

Single Unified Safeguarding Review Consultation
4th Floor North
Safeguarding and Advocacy
Enabling People Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Further information and related documents

[SUSR Draft Statutory Guidance](#)

[SUSR Easy Read Draft Statutory Guidance](#)

[SUSR Child Friend Draft Statutory Guidance](#)

Large print, Braille and alternative language versions of this document are available on request.

Contact details

For further information:

Single Unified Safeguarding Review Consultation
4th Floor North
Safeguarding and Advocacy
Enabling People Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Email: SUSRWales@gov.wales

This document is also available in [Welsh](#).

UK General Data Protection Regulation (UK GDPR)

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff and staff working in the Welsh Government funded Single Unified Safeguarding Review Coordination Hub, dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g., a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

You should also be aware of our responsibilities under Freedom of Information legislation.

If your details are published as part of the consultation response, then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years.

Your rights

Under the data protection legislation, you have the right:

- to be informed of the personal data held about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection.

For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the UK GDPR, please see contact details below:

Data Protection Officer:
Welsh Government
Cathays Park
CARDIFF
CF10 3NQ
e-mail:
Data.ProtectionOfficer@gov.wales

The contact details for the Information Commissioner's Office are:

Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: 01625 545 745 or
0303 123 1113
Website: <https://ico.org.uk/>

Consultation Response Form

Your name: Abigail Rees

Organisation (if applicable): Barnardo's Cymru

Email / Telephone number: abigail.rees@barnardos.org.uk

Your address: [Click or tap here to enter text.](#)

Consultation Questions:

1. Does the Introduction provide clarity on the aims and reasons for producing the Single Unified Safeguarding Review process (SUSR)? Is the Introduction as set out in Section 1 clear and easy to understand?

Yes

No

Please comment:

[Click or tap here to enter text.](#)

2. Do the Principles which underpin the SUSR set out in Section 2 achieve the desired outcome of a proactive approach to taking solutions forward and a positive shared learning culture which avoids multiple reviews of an incident, helping to reduce further trauma for victims and families?

Yes

No

Please comment:

Barnardo's Cymru is a leading voice in safeguarding vulnerable children and young people. Our practitioners support children and their families through the current review process so we understand the distress this experience can cause families. We agree with the draft guidance that any safeguarding review process must be concluded as swiftly as possible to reduce the negative effects on children and their families that can occur through a drawn-out process. Barnardo's Cymru welcomes the focus on the prevention of re-traumatisation of victims and their families. We welcome the potential for a timelier approach to safeguarding reviews as we know that long delays can cause significant distress to children and young people who are victims or the family of a victim. Barnardo's Cymru practitioners support children, young people and their families through the current review process and have

experienced the strain, mental health impact and trauma that can develop when the process is drawn out over more than 18 months or through multiple reviews. In addressing this we agree that future SUSR timelines should not go beyond 12 months and welcome the development of one single review to limit the re-traumatisation of victims and families. To strengthen this approach, we would like to see further reflection on the position of the third sector and specialist services in supporting and mitigating the impact on children and their families.

3. Does Section 3 provide the clarity required to determine when a SUSR should be undertaken and are the criteria clear and useful?

Yes

No

Please comment:

[Click or tap here to enter text.](#)

4. Does Section 4 provide clarity of the SUSR process and is there sufficient detail for each stage?

Yes

No

Please comment:

We welcome the detail set out in Section 4, particularly related to the timing of each stage. We are supportive of the intention of the Action Plan to be finalised within four weeks of the final Report being approved by the chair and other parties. We would highlight the need for adequate funding and resources to ensure the backlog of cases is sufficiently depleted and ensure the timely approach is achievable by those working within the guidance.

5. Are each of the Roles and Responsibilities as set out in Section 5 clear and useful?

Yes

No

Please comment:

We agree that it would be a positive step for a body of people to be created. However, regarding the Hub and the coordinators, it is not clear yet who those people are and how they fit together. We ask when there will be more information on this aspect. We would also like to see further clarification around the recruitment and induction of key posts. Our practitioners have a number of questions around how this will take place and when they will be in post to deliver the reforms highlighted throughout the draft guidance.

6. Do paragraphs 5.6-5.9 and appendix 3 of the guidance help Reviewer(s) to consider whether community partners (such as independent and third sector organisations) should be engaged in the SUSR process? If not, how could the guidance improve on this?

Yes

No

Please comment:

Click or tap here to enter text.

7. Do paragraphs 5.7 – 5.9 and Appendix 3 of the guidance help Reviewer(s) to consider whether specified information should be requested from a ‘qualifying person or body’? If not, how could the guidance improve on this?

Please comment:

Click or tap here to enter text.

8. To what extent do you think engagement from relevant community partners or the supply of specified information from a ‘qualifying person or body’, where appropriate, could assist the SUSR process?

Please comment:

As a specialist support service for children, young people and their families, Barnardo’s Cymru works closely with victims. Third sector engagement is invaluable as often our services can bridge the gap between the individual and statutory services, allowing children and their families a safe space outside of other service involvement. We believe that there are areas which, if addressed, could help strengthen provision namely that there are more clear mechanisms of support for children/families/extended families recognising the re-traumatisation risk and offering whole-family support and that the third sector is best placed to offer this.

9. Are the guidelines for engagement with victims, families and principal individuals as set out in Section 6 clear and useful? Consider whether it is clear that the Reviewer(s) and Review Panel need to approach each participant in the review on a case-by-case basis and ensures that the victim, families and principal individuals are at the heart of the review process.

Yes

No

Please comment:

Barnardo's Cymru practitioners highlighted cases where families were waiting for outcomes for more than 18 months. The impact of this is devastating to children and their families who are already traumatised and potentially vulnerable due to their experiences surrounding the review. We would encourage providing greater clarity around how this process will work in terms of its operational delivery, and particularly how third sector will be expected to contribute as part of this process. This should include multiple organisations, and learning but there needs to also be a focus on children and their voices throughout. There could be positive outcomes from the streamlined process, but it is vital to ensure that there are adequate resources including significant funding. The ability to ensure more independent reviewers could have significant cost implications. In addition, to ensure this process can be fully realised there must be further clarity around additional funding and management for the board. Without this we believe the intentions of the draft guidance will be unable to be fulfilled. Whilst we believe many aspects of this new process present positive opportunities for change, we also highlight our recommendation that this process, and all the resources necessary, must be adequately funded to be fully realised. "In some circumstances, appropriate support from key professionals may need to be made available to the respective children or family members". - We would like this extended to all instances where children are involved with the review process. The draft guidance doesn't go as far as saying the child's voice will be included within each review, and it should. Ensuring children and young people are able to access support after witnessing or being involved in any way in a case, is key to ensuring they are not re-traumatised and are able to recover with the help of specialist services.

10. Section 7 outlines the number of stages which need to be undertaken as part of the review process. Are these stages in the appropriate chronological order and clear in terms of what is required?

Yes

No

Please comment:

[Click or tap here to enter text.](#)

11. Does Section 8 ensure that learning is a key component of the SUSR process and a statutory obligation by providing clarity on how learning and information is shared as part of the wider process including working with relevant partnerships such as Community Safety Partnerships and Public Services Boards?

Yes

No

Please comment:

Barnardo's Cymru welcomes the intention to create a central repository to share learning and complete a training needs analysis. We share the view that opportunities for learning are key to improving the SUSR process and create a body of evidence to ensure that instances are not repeated where they can be prevented by shared knowledge. We believe that sharing of learning within this process should be a fundamental objective, including a wide range of ways of sharing this information to ensure maximum capture and we would encourage a move to mandatory engagement by all relevant agencies. A focus on the production of thematic reports leading to learning is really encouraging. We would support a move to increased searchability and more measurable action plans, and follow on, and follow up and encourage amendments that breaks down silos. We would welcome the opportunity for greater transparency and consistency through the renewed process. Currently there are recommendations following a review, but we are pleased to see that the new draft guidance could make it possible to have a bigger, wider action plan. This would create significant opportunities for learning and support a collaborative approach. Much of the current learning is localised. We would welcome a more comprehensive pan-Wales approach to learning, sharing good practice and training opportunities. Despite this, there are some concerns from practitioners around the huge levels of coordination needed to make this process a reality. It is encouraging that the draft guidance talks about the impact of trauma and seeks to minimise this for victims and their families, however we would encourage the Welsh Government to provide further clarification around what training would be available to practitioners and whether this would be trauma informed training.

12. Does Section 9 set out the data protection considerations in a way that is clear and useful? Would you like to see a clear legal obligation in this section requiring review partners to share information for SUSR review purposes when requested, if one could be found?

Yes

No

Please comment:

[Click or tap here to enter text.](#)

13. Does the guidance provide sufficient clarity and flexibility to ensure that key partners including Community Safety Partnerships and Public Services Boards will be effectively engaged and involved within the SUSR process, where this is appropriate and helpful?

Yes

No

Please comment:

[Click or tap here to enter text.](#)

14. What in your view would be the likely impacts upon individuals and groups with protected characteristics of the ways of working set out in this guidance? Your views on how positive effects could be increased, or negative effects could be mitigated, would also be welcome. Please use the text box to explain your reasoning.

Click or tap here to enter text.

15. What in your view are the likely other impacts of the ways of working set out in this guidance? You may wish to consider, for example, benefits, and disbenefits; costs (direct and indirect), and savings; other practical matters. Your views on how positive effects could be increased, or negative effects could be mitigated, would also be welcome. Please use the text box to explain your reasoning.

Click or tap here to enter text.

16. We would like to know your views on the effects that the SUSR process would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Click or tap here to enter text.

17. Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We welcome the intention to communicate in the language of choice of the victim and their family, this is an important part of making them feel comfortable and heard. Despite this, practitioners have raised their concerns around ensuring there are enough Welsh Language reviewers. We would like to see further clarification around how independent Welsh speaking reviewers will be recruited in North Wales where the pool of specialised, trained practitioners is smaller.

18. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

We welcome many of the changes in the SUSR draft guidance, such as the

opportunity for greater transparency and learning and a focus on ensuring the impacted family is at the heart of the review process. However, whilst we believe many aspects of this new process present positive opportunities for change, we also highlight our recommendation that this process, and all the resources necessary, must be adequately funded to be fully realised. Going forward the statutory guidance must be clearer about how children and families will be at the heart of decisions and considerations made during the process. It is a positive step that “The whole process has been developed in collaboration with stakeholders and practitioners who work with children and young people.” We support the guidance’s intention that children and young people may make an expression of wish to be involved as much or as little as they choose, but we encourage the guidance to reflect on how else children and young people’s voices can be heard through the process whilst remaining acutely focused on a trauma-informed approach. It is encouraging that the draft guidance talks about the impact of trauma and seeks to minimise this for victims and their families, however we would encourage the Welsh Government to provide further clarification around what training would be available to practitioners and whether this would be trauma informed training. Fundamentally, we welcome the pursuit of improving safeguarding reviews and can see how this guidance could promote better outcomes, reviews and timescales. We encourage there to be a pivotal focus on trauma-informed training, coordination of resources and adequate funding to ensure this guidance achieves its aims and that children, young people and their families get the very best support and opportunity to voice their experience in a timely and transparent process.

Responses to consultations are likely to be made public, on the internet or in a report.

If you would prefer your response to remain anonymous, please tick here:

