

Barnardo's NI
Consultation Response to the
Department of Health and Department of Education
Strategy for Looked After Children:
Improving Children's Lives

July 2018

Barnardo's NI is the largest children's charity in Northern Ireland. We work with approximately 14,000 children, young people and families across more than 50 different services and programmes and in over 200 schools. We provide a wide range of services, from providing family support and early intervention to working directly with children and young people in need of support. We believe that every child deserves the best possible start in life, and our service provision reflects that philosophy.

Barnardo's NI welcomes the opportunity to comment on the draft Strategy for Looked After Children: Improving Children's Lives, following our earlier engagement on the development of this strategy at pre-consultation stage and more recently at Department-led workshops, as well as discussions in relation to the [Access All Areas](#) (2017) report. Our comments are informed by our wide range of services working with children and young people who are looked after, care experienced young people, and care leavers. In developing our response to this consultation, we also sought comments from young people engaged in the Barnardo's NI service Disabled Children and Young Persons Participation Project (DCYPPP). DCYPPP facilitates the participation of young disabled people aged under 25 in children's services planning processes.

Our comments are listed according to each outcome, following a number of general overarching comments below:

General Comments

- We welcome the approach to the Strategy taken by the Department of Health and the Department of Education, both in terms of working together and in engaging other stakeholders, including the voluntary and community sector. This has been evident throughout the development of the Strategy and since the launch of the consultation period with a number of workshops providing opportunities to discuss the proposals. However we are concerned that the Strategy does not reflect the experience of those looked after children who enter or are affected by the youth justice system; we therefore recommend that the Department of Justice is engaged as a third Departmental partner on this Strategy in recognition of the high numbers of care experienced children affected by the youth or criminal justice systems.
- We welcome that the draft Strategy, at 5.2, refers to partner agencies in the voluntary, community and independent sectors as part of the Corporate Family, and we recommend that this is made explicit with a clear understanding across all sectors of roles and responsibilities.
- Whilst we welcome that specific parts of the Strategy consider the needs of children who are looked after and who have a disability, we recommend this group is explicitly referenced in the scope (2.9) and in the case for change (3.3) in recognition of their prominence within the looked after population and their specific needs.
- We are concerned that the Strategy does not acknowledge the children being placed out of country due to difficulties in providing care or a lack of resources. We recommend this is investigated and addressed immediately to bring an end to this practice.
- We welcome the acknowledgement of the importance of relationships evident in the draft Strategy, including the relationships between professionals and children as referenced in 5.7. We recommend clarity is provided as to how professionals will be supported to build effective, lasting relationships with children and young people who are looked after.

- We welcome the scope of the Strategy outlined in the pledge. We recommend that the definition of 'in care' is expanded to include 'care experienced'. We also recommend that 'after care' explicitly refers to 'continuing care'. Whilst we welcome that there is a pledge to 'extending support for children and young people after-care', more detail is needed on what that would look like in practice. The care relationship doesn't end as a child enters adulthood: most young people who are not care experienced require ongoing support from parents into adulthood, therefore it is unreasonable to expect that some of our most vulnerable young people won't also need some form of safety net of support as they face their first number of years of adulthood – this should be needs based and up to at least age 25. This type of support goes beyond that currently offered by GEM, which we recommend is reviewed and updated to widen the reach to any child leaving care, extended up to at least age 25, and rolled out on an opt-out basis.
- Finally, whilst we appreciate the well-meaning intentions, we would like to raise a point about some of the language used in the Strategy which could be more inclusive. For example, we would like to see a move away from the term 'LAC' to describe children. Additionally, page 26 makes repeated references to children who 'suffer from' or are 'suffering', and we recommend this term is reviewed as it can be considered a form of prejudice and indicates a medical rather than social model of understanding.

Outcome 1: Living in a society which respects their rights

- We welcome the commitment to review the looked after children review process (R1) and urge that that review considers how to prevent unnecessary delay within the process. Whilst this is referenced later in the draft Strategy under Outcome 4, we recommend it is also incorporated under this action point.
- We welcome the commitment to develop an integrated care pathway for looked after children and young people with disabilities which enhances transition to adult services (R2); we recommend that this pathway is broadened to consider the lasting impact of trauma and the often difficult transition to adult mental health services, as well as the myriad of other complexities associated with transitioning to adulthood. Barnardo's NI would be keen to work with the Department in

developing this pathway given our service delivery experience in the areas of care leavers, disabled young people, and mental health and wellbeing.

- In relation to enabling children to be involved in the co-design of policy, service and practice development (R3), we urge that this is meaningful and ongoing engagement rather than consultations and surveys; the young people should be involved in the design from the very start of the process, and should be valued as partners. The engagement should be beneficial for the young people, with feedback and outcomes clearly communicated back. The voluntary and community sector has this experience.
- The young people from DCYPPP were clear that they believe children and young people who are looked after should be asked more often what they want in their lives and that two years is too long for a young person to go without being asked about their views on being in care. They recommend that young people should be visited by their social worker regularly and asked every 6-12 months about their views regarding their looked after child status and their placement.
- We welcome the reference to life story work in the draft Strategy (6.6): this is a positive model but is rarely implemented or developed successfully. This model should be promoted to enable children and young people to understand and take ownership of their story. We recognise that this is not always easy and is time sensitive as the life story develops, but we are keen to see this rolled out as practice for all children who are looked after. To ensure consistent implementation, we recommend that this commitment is reflected in the implementation plan and receives the level of focus and dedication required to drive change.

Outcome 2: Living in a society in which equality of opportunity and good relations are promoted between persons who share a relevant characteristic and persons who do not share that characteristic

- Barnardo's NI strongly believes that Outcome 2 requires dedicated actions to ensure that it is achieved. Whilst we recognise the draft Strategy's suggestion that it is intrinsically linked to the other Outcomes, we believe that this position risks making this Outcome weak: it is not enough to hope for equality of opportunity for such a marginalised group of young people to

be a by-product of other actions. We recommend that actions are assigned to this Outcome – alongside the other actions across the draft Strategy and implementation plan - to actively 'level the playing field' for children and young people who are looked after or care experienced, and that there is long term monitoring of the outcomes for this group with this shared characteristic. This should reflect section 75 duties and consider the specific needs of those children who face particular challenges.

Outcome 3: Physical and Mental Health

- We welcome the commitment to review the practice and legislation which requires a child with a disability provided with short breaks to become looked after solely on the grounds that he/she is provided with short breaks (H1). This was something we and the young people we work with welcomed in our response to the draft Adoption and Children Bill. However, both we and the young people from DCYPPP who provided their views on the draft Strategy strongly believe that there still needs to be some means of regulating quality of provision to ensure safety and support, and that there should be a review system for those children who are availing of regular short breaks. It is important that children and young people who use short breaks still have access to the security offered by the corporate parent; the short breaks process should provide flexibility and dignity for children outside of the care system, whilst still offering the support and duty of care of a corporate parent. The process and the usage of short breaks should be monitored on an ongoing basis.
- Whilst we welcome the intention to explore options for early interventions and support within the school environment to promote the wellbeing of looked after children (H2), we recommend this action is strengthened, with a greater sense of aspiration and a clear commitment to implement interventions. To be effective, there needs to be a read-across between the school and the home environments. Our schools counselling service engages a significant number of children who are looked after, and we see potential for the promotion of wellbeing to be embedded within the school day to support resilience building in children. Barnardo's would be happy to work with the Department in developing child-centred actions around this point given our service delivery experience in the areas of mental health and wellbeing and schools-based interventions.

- We welcome the move to a more holistic health assessment outlined in H3. We recommend that integrated working between the teams and workforce around the child is facilitated to ensure professionals can recognise, understand and address any issues arising; this means an understanding of trauma informed practice and emotional health and wellbeing issues within the workforce is critical. This model needs to be child centred to allow for effective early intervention, and it must also be responsive in light of waiting lists for mental health services. Further, it is important that this assessment is offered and provided in a non-stigmatising way. Again, we are happy to work with the Department to develop effective models based on our service delivery experience.
- We welcome the commitment to develop an effective pathway incorporating transition planning to adult services to specifically address the mental health needs of children who are looked after. We recommend that as part of this, CAMHS is extended to at least age 25 for care experienced young people and care leavers, in recognition of the corporate parent's responsibility to address the earlier trauma which led to the child becoming looked after. This extension to at least age 25 would also go some way to address the isolation and loneliness often experienced by young people leaving care. We also recommend that consideration is given to supporting broader mental health and wellbeing needs at this difficult transition stage, particularly for those young people who may not meet the threshold for Trust mental health services but who still require support and assistance.

Outcome 4: Living in safety and with stability

- Whilst it is important that this outcome focuses on safety, we believe that stability is equally important. We therefore recommend that more actions are attributed to ensuring children live with stability in the implementation plan. The Strategy needs to meet the child's needs: it therefore needs to consider how placement disruption, Social Worker changes, school moves and sibling separation can be minimised to ensure stability is provided for the child and that their needs are the driving force behind decisions, rather than resource.

- We welcome that the draft Strategy references the importance of sibling relationships as “an important consideration for the child’s identity” (p37, 6.27.9). We recommend that the needs of sibling groups and alternatives to separation are considered, and that this aspect of stability is reflected in the implementation plan.
- We welcome the commitment to develop proposals to extend the support available to children leaving care (S3). As referenced above and in Access All Areas (2017), we know that young people leaving care can face a number of challenges and require support across a range of areas. Young people involved in DCYPPP shared concerns that transition planning doesn’t always inform the young person of what will happen after school; they feel that better guidance needs to be put in place regarding transition planning, including clear guidance about when that should commence and how often it should be reviewed. As a provider of Leaving Care support, Barnardo’s NI would be happy to engage with the Department in developing the proposals.

Outcome 5: Learning and Achieving

- We welcome the commitment within the draft Strategy to seek to close the educational attainment gap and foster aspiration. However, we believe it is critical that this section of the Strategy also recognises that education, learning and achieving is broader than school. Whilst we can understand the focus on academic achievement, this emphasis on GCSE grades fails to recognise the distance travelled by young people in care. We therefore recommend that other measures are included alongside the academic measures to capture the progress and achievement of all young people who are looked after. Within that, consideration should be given to factors such as attendance and school placement disruption or moves; whilst stability is addressed in an earlier outcome, it should be noted that stability has an impact on educational outcomes too.
- We welcome the commitment to supporting schools to become attachment aware (L1). Young people from DCYPPP said they believe it would be helpful for teachers to have extra training so they understand looked after children’s circumstances better. There is often a lack of understanding or awareness of the needs of children who are looked after within schools, and there is a

need to provide individualised support. We therefore recommend that teacher training (both initial and ongoing) should include an understanding of attachment, trauma and the care system. Further, we recommend that the voluntary and community sector is added to the list of partners against this action in recognition of the knowledge and attachment expertise within the sector.

- We welcome the series of reviews outlined in L4, and recommend that children, young people and families are engaged in the review of PEP. Further, the young people involved in DCYPPP feel that the PEP and PLP should be combined for children who are looked after and have a disability to avoid duplication (L5).
- Whilst we welcome the commitment to support children and young people to take part in after school programmes and out of school activities (L6), we urge the Department to consider that the cost to families of these activities can be huge, particularly often in the case of kinship carers. We recommend that additional financial support is given to families to facilitate these activities, and that this is provided in a non-stigmatising and flexible way, for example monetary contributions rather than vouchers.
- We appreciate the sentiment behind the commitment to creating “opportunities for second-chance learning” for children who are looked after “when they have attained greater stability in their lives” (L7). However, we are concerned about some of the language within this action. We recommend removing the reference to ‘attaining stability’ and rephrasing ‘second-chance learning’ to ‘support ongoing opportunities for learning for all children and young people who are looked after’. These opportunities should be available for all young people who are looked after or care experienced up to at least age 25, be more than academic, and recognise stable accommodation as a key factor in a young person’s ability to engage in learning opportunities.

Outcome 6: Play and Leisure

- In relation to Outcome 6, we recommend the Department notes the importance of friendships in a child’s life and how this can provide access to play and leisure activities. This again relates to

stability and the impact of placement disruption / school moves on a child's ability to realise their right to play.

- Whilst we welcome the cross-departmental approach referenced in P2 regarding the work with DAERA to maximise the use of educational and recreational facilities at Nature Reserves and Country parks, we wish to note that not all these areas are accessible to all children who are looked after – whether for geographical reasons or accessibility for children with a disability. We recommend that local Councils are engaged on this issue alongside DAERA to identify a consistent and innovative approach to making best use of Council resources for play and leisure activities across all ages and abilities.
- Young people at DCYPPP told us there should be more opportunities for children – particularly those with a disability – to go out with friends and do “regular things” that other young people can do. Further, we recommend that consideration is given to how play and leisure commitments will be met for those groups of young people who are older but still need social engagement and social learning opportunities through age-appropriate play and leisure. With that in mind, we question why a stated measure refers to the level of satisfaction with ‘approved’ schemes and suggest this should be broadened.

Outcome 7: Economic and Environmental Wellbeing

- We welcome the commitment to work with young people to review the current arrangements for providing them with advice, guidance and representation (EE1). We believe that children should have a say in who the people in their life are who guide them through the services and transitions; we recommend that children who are looked after should have a constant and consistent point of contact – other than their Social Worker - as they transition through different stages of life, in recognition of the critical role of relationships and permanence in fostering stability and wellbeing throughout the young person's life.
- We welcome the cross-departmental and cross-sector approach outlined in EE2 to build on and enhance measures currently available to young people leaving care. We recommend that this action point is expanded to include health (as referenced in the draft Strategy) to ensure holistic, child centred, wraparound support that reflects the complexity of transition needs.

- In relation to housing, we are concerned about young people's access to safe, sustainable accommodation and the Housing Executive criteria that need to be met for this, which can mean the most vulnerable young people are left unsupported. We recommend this process is reviewed to ensure those who need support are able to access it.
- Young people at DCYPPP told us they would like a lot more support with managing money and that this should be addressed in school. They also feel that it would be helpful to have advice about jobs and better, more specific advice concerning jobs, placements and transition for young people who have a disability and are looked after.
- Working closely with our colleagues in Action for Children, Barnardo's NI warmly welcomes the proposal set out in the draft Strategy to put the GEM Scheme on a statutory footing. However, we believe this raises a number of issues, including:
 - i. the need to review the effectiveness of the current GEM Scheme;
 - ii. looking at Scheme Governance arrangements including registration of carers, the role of Fostering Panels, insurance, transition arrangements, and consistent delivery across HSC Trusts;
 - iii. Regulation and Inspection issues (and the role of RQIA in this);
 - iv. the need to refresh the GEM Scheme Guidance including how the needs of care leavers will be assessed at transition and beyond and whether different levels of financial support are required given different levels of need over time;
 - v. examine how the Scheme will operate not only for HSC Trusts but also for independent charitable providers of fostering services (like Barnardo's NI and Action for Children); and
 - vi. the need to clarify how foster carers will continue to access support and have their needs assessed.

As part of co-production principles and reflected in '*Improving and safeguarding social wellbeing - a strategy for social work in Northern Ireland (2012-22)*', we believe foster carers and young people involved in the GEM Scheme should have the opportunity to be actively engaged and consulted in the co-design work on putting the GEM Scheme on a statutory footing, review of the existing GEM Scheme and developing refreshed GEM Guidance. For our part, Action for Children and Barnardo's NI would be very willing to take an active role with the Department and other key stakeholders in further work on the above.

Outcome 8: Contributing Positively to Community and Society

- We welcome the commitments made under this Outcome and the aspiration to promote a positive image of children who are looked after, and we are keen to support the implementation of this. Young people at DCYPPP felt it would be great to hear more good stories about young people in care in the media, on the provision that the young people agreed to their story being told. The young people also suggested that showcasing foster carers and projects that work with children and young people who are looked after could help improve perceptions of looked after children and the care system.

Conclusion

Barnardo's NI is pleased to see the publication of this draft Strategy and welcomes the direction and approach of the two Departments. We hope the above comments, informed by our service delivery experience and the views of young people, are helpful as the Departments move to finalise this encouraging and wide ranging document. As noted throughout this response, there are a number of relevant areas in which Barnardo's NI has significant experience, and we would be happy to further engage with the Departments as this Strategy enters its next stage of development.

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