

Response ID ANON-9DCT-7CNE-1

Submitted to **Information Sharing for Child Protection Purposes**

Submitted on **2019-07-31 10:54:29**

Introduction

1 What is your name?

Name:

Liz Arthur

2 What is your organisation?

Organisation:

Probation Board for Northern Ireland

3 Anonymised comments may be published on this site or on the Department of Health website and in the resulting report on the consultation. If you are replying on behalf of an organisation, only the name of the organisation will feature in this report.

I Agree

4 What is your role within the organisation?

Q4:

Assistant Director - Risk

Questions

5 Overall, do you think the draft guidance will give practitioners the confidence to know when and how they can lawfully share information for child protection purposes?

No

If no, why not?:

The Guidance needs to be more succinct, focusing on salient points and written in a jargon free style. It is not necessary, for example, to repeat information referenced in the Co-operating to Safeguard Children and Young People in Northern Ireland DHSSPS (2017). Salient points are lost in providing too much detail/background information.

There is a wider issue which the guidance could address. At the point of referral/assessment agencies should be checking if a family/individual is known to another agency. This information exchange will in turn inform how a case is dealt with. The threshold of having a 'significant concern' is too high.

6 Do you think the draft guidance accurately and adequately describes the legal framework within which the sharing of personal information for child protection purposes takes place?

No

If no, why not?:

see comments to Q5

Legislation is in place to allow information to be shared where there is a suspicion a child is suffering or is likely to suffer significant harm. A recommendation from the Leyton review is for there to be a review of the Memorandum of Understanding between the PSNI, HSCTs and PBNI relating to 'Urgent Welfare Checks'. The threshold for sharing information should be lower than 'significant harm'.

7 Are the principles set out in the draft guidance to be applied to the sharing of personal information for child protection purposes clear? (Section 3)

No

If no, why not?:

see comments to Q5

Recent case reviews have highlighted the need for clarity in respect of consent i.e. cases where sharing needs to take place regardless of whether the individual consents or not.

8 Do paragraphs 3.33, 3.34 and 3.35 cover the most likely scenarios of information sharing for child protection purposes within HSCTs?

Yes

If no, why not?:

see comments to Q6 and reference to 'Urgent Welfare Checks' - these should include PBNI. PBNI may have information about individuals of concern which will help to inform assessments.

9 Do you have any comments on the draft guidance at section 4 on the sharing of personal information with other third parties for child protection purposes?

Answer below :

I agree that the 3rd parties with whom information is being shared need to know why it has been shared and what they are expected to do with it. If they are part of a risk management plan they need to know what is expected from them.

10 Do you have any comments on the draft guidance at section 7 on information sharing on child protection public protection purposes?

Answer below :

I agree information about an individual concerning historical offences but for whom there is no specific child at risk should be shared with the police and if appropriate, the Probation Board.

11 Are you aware of other relevant information documents, not already listed in the draft guidance, which would be useful to practitioners seeking to share information for child protection purposes to read in conjunction with this guidance?

No

If yes, please comment below :

12 It is proposed that the draft guidance will replace existing HSS Circular 3/96, and that HSCT procedures for sharing information for child protection purposes will be developed and agreed on a regional basis. Do you agree that procedural guidance should be developed?

Yes

Please explain:

Yes, the importance of sharing accurate and up-to-date information to inform effective risk assessment cannot be underestimated. Failure to share information has been a deficit identified in the majority of Case Management Reviews and Serious case reviews. Clear, unambiguous guidance needs to be developed and training provided.

13 Please use the box below to insert any further comments, recommendations or suggestions you would like to make in relation to the draft information sharing guidance

Answer below :

N/A

Promotion of Equality of Opportunity and Rural Impact

14 Are you aware of any likely impact on equality of opportunity for any of the Section 75 equality categories?

Please explain:

No

15 Are there opportunities for the guidance to better promote equality of opportunity for people within the Section 75 equalities categories?

No

If yes, please specify:

16 To what extent is the guidance likely to impact on good relations between people of different religious belief, political opinion or racial group?

Answer below :

N/A

17 Is the guidance likely to impact on good relations between people of different religious belief, political opinion or racial group?

No

If yes, please explain :

18 In relation to the Rural Impact Assessment Screening, are there any issues which you believe need to be addressed which haven't been, or any comment you wish to make on what is contained in the current screening document?

Answer below:

No

19 Do you have any additional data relevant to the rural impact assessment?

No

If yes, please comment below :