



14 June 2019

Response to the Scottish Government's Consultation on Children's Services Planning – Provision of Statutory Guidance

We welcome the opportunity to respond to this consultation. Children in Scotland is the national network improving children's lives. Via the National Third Sector GIRFEC Project, we support third sector organisations to improve their capacity and capability to contribute fully to their local children's services plan, with the vision that the third sector becomes an equal and valued partner in improving children's outcomes at national and local level.

To inform our response to this consultation, we hosted two workshops on 14th and 23rd of May in partnership with GCVS *Everyone's Children Project* and the *Health and Social Care Alliance Scotland* (the ALLIANCE) to gather views and experiences on local children's services planning. GCVS and the ALLIANCE endorse this response. A total of 38 individuals took part in these events, from 31 organisations.

General comment

Reinforcing children's rights and GIRFEC

The statutory guidance helps explain the requirements on local authorities and NHS Health Boards to develop a Children's Services Plan under Part 3 of the Children and Young People Act (Scotland) 2014. It also helps illustrate how these duties could be fulfilled by giving advice to local partnerships on the key stages when developing a Children's Services Plan. The guidance emphasises the significance of the Getting it right for every child (GIRFEC) approach and practice which is underpinned by children's rights, outlined in the United Nations Convention on the Rights of the Child (UNCRC). It is important that the refreshed guidance continues to put children and young people's rights at its heart and reinforces its importance at different stages of the planning process.

Through our ongoing engagement work, we noted there is already good practice being developed in local areas around reinforcing child rights.

For example, Article 12 of the UNCRC says that children and young people have the human right to have opinions and for these opinions to matter. It says that the opinions of children and young people should be considered when people make decisions about things that involve them. The Our Peer Education Network (OPEN) project uses young people's voices, together with Community Partnership in Shetland to map existing service provision, identify gaps in current services and improve local children's services planning at a strategic level. It has helped to ensure that groups of children

and young people are not being overlooked or that services are not duplicated or competing with one another. ([Read the full case study here](#))

We recommend that the refreshed guidance includes positive practice examples to share learning and encourage further improvement.

Accessibility

It is understood that the guidance was “developed to assist the professionals and community representatives involved in children’s services planning, but it will also be of interest to individuals and organisations involved in the delivery of services, as these have the potential to be directly affected by the process”.

Although the guidance was designed primarily for planning partners in the statutory sector, we strongly believe it is essential that community representatives, parents, carers, children and young people understand the process, so that they can participate and contribute effectively in children’s services planning. However, we feel that the language used in the current guidance is not as accessible as it could be.

We strongly suggest that an Easy Read version of the guidance be made available for those who do not have statutory responsibilities but have a potential role in the planning process. The guidance could also be complemented with visuals such as flow-charts to help explain key stages within the planning process. If, for legal reasons, this cannot be achieved via the statutory guidance, an accessible practice guidance which sits alongside the statutory guidance will be needed.

Commissioning and Implementation

As the statutory guidance states, children’s services planning is an ongoing process. While the current guidance provides useful details on preparation of the Children’s Services Plan, it would be enhanced by including more information about the strategic commissioning process and how it can be better embedded into the planning cycle. Particularly, we suggest that third sector data is used when assessing population need. This could help identify the needs and rights of vulnerable children and young people, including disabled children and young people, who are accessing support from third sector organisations. Also, we believe the procurement of services could be more joined up with the planning process. Guidance on purchasing practice, in keeping with the rights-based and co-production ethos being developed with regard to children’s services planning, will help ensure it reflects the priorities identified in the Children’s Services Plan.

Q3 Consultation and Engagement

How could the guidance be improved to enable effective consultation and engagement with local stakeholders during the preparation of a Children’s Services Plan?

From the feedback we gathered through our consultation events, we noted that the views of certain groups of children and young people are not always being included in the current planning process. For example, vulnerable children such as those with disabilities and additional support needs appear in some cases not to have been included due to the lack of appropriate support during consultation and engagement.

The guidance could be strengthened to make it clear that the engagement process should be inclusive for all. It is not a choice. For example, p.38 Point 91, instead of "local authorities and health boards *may wish* to give particular attention", the guidance could be amended to "local authorities and health boards *are expected* to give particular attention to the views of children, young people and families".

At the same time, while consultation provides valuable information about the strengths, weaknesses and gaps in existing service provision, it does not empower individuals and communities receiving children's services to the same level as involving them in the design and delivery of the services they use - one of the four main principles in the Christie Commission (2011). We recommend that children's services planning should move towards co-production with communities rather than remain limited to consultation.

Q4 Collaboration

How could the guidance be enhanced to emphasise the importance of multi-interagency integrated collaboration in the preparation of the Plan and the delivery of services?

"This guidance has been designed to support effective implementation by explaining the purpose and detail of each duty, it is not prescriptive about how certain functions should be realised in practice."

While we recognise the importance of allowing flexibility so the planning partners may shape their own approach in reference to their local context, it would be helpful to provide greater clarity about the role of the third sector, including the Third Sector Interface (TSI). Local Third Sector Interfaces play a valuable role in the broader consultation and planning process, mediating or coordinating responses from across the third sector. The guidance should also explicitly advise local authorities and relevant health boards to consider how they can support and resource TSIs to do this effectively.

The third sector and community representatives can be active and equal members of the planning groups. Their participation should go beyond consultation. Again, there are existing examples where TSIs took a lead role in supporting and collaborating with local authorities, NHS Health Boards and other planning partners in the development of the Children's Services Plan. The refreshed guidance should be strengthened by incorporating these examples.

For example, as an equal partner of the Children's Partnership, the Third Sector Interface in North Lanarkshire (VANL) collaborated with the local Children's Partnership in the mapping of children's services in 2017. They co-developed the questionnaire to ensure it was accessible. VANL co-ordinated input from their members as well as the Children and Families Third Sector Network. As a result, the partnership was able to reach the children and young people who do not usually engage and include their voices in the planning process.

During our consultation seminars, there was a very strong call for the guidance to take a lead in ensuring clear connections between the different (and welcome) children's services policies and initiatives. For example, strategic children's services planning guidance should reflect and align with other planning processes like those tackling

child poverty, addressing Adverse Childhood Experiences (ACEs), closing the attainment gap, Health and Social Care Plans, etc. The refreshed guidance should highlight the advantages of connecting these processes together to achieve a greater impact of these plans collectively.

Q5 Support practitioners and operational managers to deliver local priorities

How could the statutory guidance be enhanced to enable the Plan to support practitioners and operational managers deliver the local priorities and actions?

As described in the General Comments section above, it is essential to make the information in the guidance accessible and concise. Practitioners and managers from both statutory and third sector agencies play a substantial role in delivering local priorities. It is important that they share the same understanding of the guidance and that appropriate resources are dedicated to support implementation. Workshop participants held the view that a set of accessible and/or Easy Read guides and fact sheets may be as helpful to practitioners as to families.

Those participating in the workshops called for the development of practical tools such as diagrams, checklists, further development of the 10-steps (Guidance Appendix D) and top-tips for participation. Participants were clear that such tools would add value to the revised statutory guidance.

Children in Scotland National Third Sector GIRFEC Project

Health and Social Care Alliance Scotland (the ALLIANCE)

GCVS Everyone's Children Project

Appendix A - Organisations that participated in the consultation sessions

Befriending Networks	National Parent Forum of Scotland
CCPS	North Ayrshire CPP
CHANGE	North United Communities
Children in Scotland	Notre Dame Centre
Child Bereavement UK	Richmond's Hope
Circle	Scottish Commission for Learning Disability
Crossreach	Sense Scotland
CVS Falkirk	Staf
CVS Inverclyde	Stretch a Nickel Foundation
Deaf Connections	Health and Social Care Alliance Scotland (the ALLIANCE)
EVOC	The Jeely Piece Club
Gamh	Upstart Scotland
GCVS	Voluntary Action South Ayrshire
Improvement Service	VSGWL
Inverclyde Council	WASLER
Kibble Group	