

## DUNDEE CITY COUNCIL

**REPORT TO:** POLICY AND RESOURCES COMMITTEE - 13TH SEPTEMBER 2010

**REPORT ON:** THE RESPONSE TO BE SENT THE SCOTTISH GOVERNMENT IN RELATION OT ITS CONSULTATION ON THE DRAFT 'NATIONAL GUIDANCE FOR CHILD PROTECTION IN SCOTLAND'

**REPORT BY:** CHIEF EXECUTIVE

**REPORT NO:** 571-2010

### 1.0 PURPOSE OF REPORT

To inform the Committee of the response to by submitted by the multi-agency Children and Young Persons Protection Committee (CYPPC).

### 2.0 RECOMMENDATIONS

It is recommended that members of the Policy and Resources Committee note the contents of the report.

### 3.0 FINANCIAL IMPLICATIONS

There are no additional financial implications in relation to this report.

### 4.0 MAIN TEXT

4.1 Earlier in the year the Scottish Government published a draft of the proposed new National Guidance for Child Protection in Scotland and advised that there would be a consultation period from 1<sup>st</sup> June to 17<sup>th</sup> September.

4.2 The government provided a pro-forma on which it asked for responses to be recorded. The attached appendix is the response from the Dundee Children and Young Persons Protection Committee using that pro-forma.

4.3 This document, once published, will replace the 1998 publication, '*Protecting Children - A Shared Responsibility*'. As has been acknowledged by government, the child protection landscape in Scotland has changed considerably since 1998. There has been national agreement that a replacement for the 1998 publication is needed.

4.4 The Children and Young Persons Protection Committee welcomes this development. Its response makes constructive suggestions as to how the document might be improved generally, as well as giving a view on specific questions asked by government.

4.5 The proposed new guidance contains proposals that, if adopted in the final version, will herald a shift in practice within Scotland. Amongst the most significant of these are:

4.5.1 There should no longer be a requirement to identify a category of registration when placing a child's name on the child protection register (e.g. Physical Abuse, Neglect, etc).

The thinking behind this is to encourage a move towards a focus on the needs of the individual child and the risks that he or she may face, rather than the focus being on categorisation.

The CYPPC welcomes the attempt to move thinking so that those involved consider the whole child; i.e. all his or her circumstances and, then, which of those may be placing the child at risk of significant harm. However, before this could be implemented there is a need

to establish a national agreement as to how we are to gather and collate performance management information that currently relies upon counting in categories.

- 4.5.2 The draft guidance seeks to define specific roles for various agencies in the child protection process.

In welcoming what the guidance does, the CYPCC points out that in the establishment of its Multi-Agency Assessment Team (MAAT) services in Dundee have already gone beyond what the guidance suggests in terms of agencies working together.

- 4.5.3 The draft guidance proposes that the chairperson of a child protection case conference could come from an agency other than social work.

The CYPCC considers that this proposal fits very well with the increasing emphasis on multi agency / collective responsibility and with the principles of Getting it Right for Every Child (GIRFEC). It is also an appropriate development as we move forward to develop the practice of having one 'child's meeting' rather than a number of different meetings for different purposes.

The CYPCC welcomes the notion that the most important consideration in relation to the chairing of key meetings is seniority, experience, independence and skill of the person concerned rather than which agency employs the person.

Social work will continue to retain primary responsibility for the management of child protection case conferences and shall be the agency responsible for the maintenance of the child protection register.

- 4.6 In common with views that it is known will be expressed by agencies in other areas of Scotland, the CYPCC makes the point that the document requires significant editing to achieve a common style of language and much clearer and user-friendly layout of sections.

## **5.0 POLICY IMPLICATIONS**

This report has been screened for any policy implications in respect of Sustainability, Strategic Environmental, Anti-Poverty, Equality Impact Assessment and Risk Management.

- 5.1 Services provided by the City Council to protect children and young people in Dundee are in keeping with Dundee City Council's Risk Management objective of identifying, evaluating and minimising risk

- 5.2 An Equality Impact Assessment has been carried out and will be made available on the Council Website <http://www.dundee.gov.uk/equanddiv/equipact/>.

## **6.0 CONSULTATIONS**

Depute Chief Executive (Support Services), Director of Finance, Director of Education, Director of Housing and Director of Leisure and Communication have been consulted in the preparation of this report.

## **7.0 BACKGROUND PAPERS**

<http://www.dundee.gov.uk/equanddiv/equipact/>.

### CONSULTATION QUESTIONS

#### General Questions

1. What are your views on the usefulness and accessibility of the guidance for your sector? Are the suggested processes and terminology used relevant to your service/agency/profession? How could they be improved?

#### Dundee CYPPC Comments

On a positive note, it has been helpful in informing the local policy context as it has developed.

At 150 pages, the document is too long and fairly dense at times showing signs of having been written by Committee. We feel there is no real clarity of purpose. Will it exist to inform policy groups? Will it exist as guidance for practitioners? If it is the latter, we feel it requires significant further work.

Is it intended as a stand-alone document or is it intended to form an appendix to local practical guidelines and policy documents?

There was a general feeling that the guidance lacks clarity and focus. There is a précis of child welfare legislation and guidance, plus research findings and current practice in terms of information sharing generally, woven through the child protection elements.

A lot of this information would be better sitting within a reference/resource bank which staff members could use as needed.

There is a lot of duplication and repetition within the document which is unnecessary. For example, within the section on responsibilities of services, a paragraph stating that it is everyone's responsibility should suffice without then having to go through every service saying it individually.

Because of its size, it is difficult to identify the priority areas easily, and therefore we suggest it would benefit from considerable editing - separating out the specific guidance on Child Protection work, from the more general reference information most of which is already available in other documents.

The guidance needs to be rigorous in its use of language and definitions to ensure clarity. A recurring need frequently heard at local level is the need to clearly specify and agree a "common language" for staff that is consistent and unambiguous.

2. The guidance seeks to strike a balance between acknowledging the *Getting it right for every child* approach as the future direction for children's services, and the current stage of its development and implementation across Scotland. What are your views on how GIRFEC has been incorporated into the document?

### **Dundee CYPPC Comments**

Those agencies and professionals with an already sound working knowledge and familiarity with the principles of GIRFEC and the practices those principles spawn, consider that the information on GIRFEC is useful in terms of the context of Child Protection work. However, they note that it is difficult to follow the thread of GIRFEC throughout the document due to its length.

Others felt unable to set out a view as to how GIRFEC has been incorporated in the document but stated their agreement that future developments in any sphere of activity in supporting children should occur within the context of local and national work in taking forward GIRFEC.

3. Are there any equality or diversity issues that should be more fully reflected in the guidance?

### **Dundee CYPPC Comments**

Domestic violence or abuse is more often than not a matter of male on female violence. We are aware that the thrust of government policy has been to emphasise this fact. Although female on male violence is relatively less prevalent and is almost certainly underreported, it should not be assumed by a national guidance document that it does not exist. Given also the increasing acceptance of single sex relationships which involve children in a family arrangement, it would perhaps be more appropriate to neutralise the concept of domestic abuse.

### **Specific Questions**

4. **Part 1: Key Definitions and Concepts:** The guidance suggests that there should no longer be a requirement to identify a category of registration when registering a child on the Child Protection Register. This is to encourage a move towards a focus on the needs and risks to the individual child, rather than on categorisation.

a) Do you agree with this change in process?

In Part

### **Dundee CYPPC Comments**

As has probably been anticipated, there are varying views on this matter.

It is a very positive step to attempt to move thinking away from a 'list' of categories towards a description that expresses the whole circumstances of the child and, within that, which of those circumstances leads to the belief that he or she is at risk of significant harm. To that end the shift of emphasis heralded by this initiative is to be applauded.

However, it is difficult to envisage how this can be accommodated within the environment of a continued need to collate, use and report management information, as discussed in b) below.

There is no doubt that the current list of categories presents the risk of putting 'blinkers' in place as to the views and perceptions of professionals. However, we suggest that the means of addressing

that is not by creating another set of challenges by dispensing with the categories. Instead, by:

- a. agreeing a list of descriptive terms that would become 'new' categories
- b. ensuring that staff development programmes as well as guidance, makes clear the point that a pre-defined descriptor must never prevent professionals understanding the whole circumstances of the child and, in particular, those circumstances that lead to a view that the child is at risk of significant harm,

we create a practical solution that allows defined terms to be used, but in the context of knowing that they are but an introduction to picture that professionals have to understand.

b) We are aware that removal of categories of registration will have an impact on management information availability, and a separate project is underway to consider information requirements at a local and national level. What are the child protection management information requirements in your area of expertise? How is this information currently collected?

### **Dundee CYPPC Comments**

If we agree that we need information that goes beyond 'the child is at risk of significant harm', then there will need to be a nationally agreed set of descriptors that each local area will be required to enter into a database, from which information can subsequently be extracted.

This is on the basis that computer systems cannot extract free text that might otherwise describe reasons. In other words, there will have to be fields into which defined and agreed descriptions are entered. If this is not to be the 'categories' as we currently know them, then it has to be something else.

If we do not need to know, for management information purposes, the reasons why a child is considered to be at such risk, then we can be content with just defining 'at risk of significant. But we suggest it is unlikely that we can be content with just 'at risk of significant harm'. We need to know why, as para 53, page 14, makes clear.

**5. Part 3: Risk Assessment:** While the guidance discusses risk assessment and indicators of risk, it should be noted that the intention is to develop a separate risk assessment toolkit. The toolkit will be based on the general principles and framework set out within the guidance, and in particular link with the GIRFEC model. On this basis, are you content with the principles set out in the guidance around risk assessment?

In Part

### **Dundee CYPPC Comments**

Although the document appears to take account of and acknowledge the complexity of risk assessment in this particular area, it will clearly be unhelpful if a risk assessment tool results in a scoring exercise which outweighs professional judgement. This is acknowledged within the body of the document.

**6. Part 3: Responding to Concerns about Children:** The guidance states: '*There are a number of tasks and roles that specific agencies have a particular responsibility for - for example, the decision to undertake a child protection enquiry (police and social work), planning a joint investigation, including the need for a medical examination (police, social work and health), and co-ordination of child protection case conferences and the child protection plan (social work).*' Do you agree with these roles and responsibilities?

In Part

### Dundee CYPPC Comments

We believe the guidance to be adequate. However, we have gone beyond what it says through having key decision-making processes truly multi-agency. We are of the view that risk assessment tools, both those developed locally and nationally, should help the underpinning processes.

**7. Part 3: Child Protection Case Conferences and Appendix 1:** The guidance introduces national timescales, in particular that initial Child Protection Case Conferences should be held as soon as practically possible and no later than **21 calendar days** from the notification of concern. Also, it suggests that participants should receive the agreed child protection plan within **5 calendar days** of the conference; and the minutes no later than **15 calendar days** after the conference.

Do you agree with these timescales? If not, what is the best standard that could be reasonably expected?

In Part

### Dundee CYPPC Comments

It is suggested that consideration be given to days be defined as 'working days' rather than 'calendar days'.

We also suggest, "Initial Child Protection Case Conferences should be held as soon as possible, and no later than **20 working days** from the notification of concern, where practicable." There are exceptionally very good reasons why a case conference might be held outwith timescales and the important principle is that the harm to the child has been assessed and actions put in place to safeguard them. This happens from the IRD, and agreed action plan, and does not wait on the case conference. The importance of professional judgement requires to be recognised.

In terms of the detailed child protection plan, it is questionable as to whether an appropriately rigorous plan can be drawn up within the timescale proposed (5 calendar days). While the case conference identifies the key areas to be covered in the plan, the detailed plan should, we suggest, be drawn up at the first Core Group meeting following the conference - which is a smaller and more parent/child friendly meeting in keeping with GIRFEC principles). We suggest that an additional timescale is inserted stating that core groups meet within 10 working days of the conference and that a detailed child protection plan should be compiled at that meeting..

**8. Part 3: Child Protection Case Conferences:** The guidance suggests that pre-birth case conferences, where they identify the need for the unborn child to have a child protection plan, should also place that child on the Child Protection Register.

Do you agree with this approach? Is this approach already taken in your area? What benefits do you see from pre-birth registration? What disadvantages?

Yes, we agree with the approach and it is the approach already taken in our area.

### Dundee CYPPC Comments

It is not helpful to ask for a single response to four separate questions. Otherwise, we do agree with the approach, which is current practice in our area.

We believe it is competent to do so on the basis that social work systems which hold the child protection register are not required to only contain information on 'legal entities'; i.e. born children. It is legitimate for such systems to contain a record relating to an unborn child so that key information that will inform assessments both pre and post-birth can be captured at an appropriately early stage.

**9. Part 3: Child Protection Case Conferences:** The guidance states that '*while the chair of case conferences will often be from social work services, where an individual could fulfil the required criteria, it would not be inappropriate for a practitioner from a different agency or service to undertake the role.*' The focus is therefore on the competency and impartiality of the chair, rather than their particular profession. Do you agree with this approach?

Yes

#### **Dundee CYPPC Comments**

There is a view that because social work holds a primary role in the investigation of child protection concerns and is allocated the key role in keeping and managing the child protection register, it should remain the case that its managers should continue to be the sole chairs of case conferences.

However, in an environment in which we are increasingly working together and developing a shared understanding of processes and priorities, the notion that a case conference chairperson can and in some cases should, be from an agency other than social work, is to be welcomed.

**10. Part 3: Child Protection Case Conferences:** The guidance states the desire to move towards a position where only one report is considered by a case conference. However, it also recognises that this is not something all areas are capable of implementing at this stage. However, are you content with the *principle* of having one composite report co-ordinated by the Lead Professional and representing the views of all services, agencies and families involved?

Yes

#### **Dundee CYPPC Comments**

The position of the lead professional is absolutely the key to such an approach being successful. A composite report will be formed by an analysis of presented data, information and recommendation across a number of agencies and will include the family's views. The skill will be in identifying and appointing the most appropriate lead professional and in that person ensuring that each agency's views are fairly represented.

It is reasonable to state that all the information should have been tabled and discussed by all the professionals ahead of a report being compiled and that, therefore, the compilation of only one report should be a relatively straightforward activity. However, we must acknowledge that the reality is likely to make additional demands on, particularly, lead workers who will need not only to compile the report, but check that it is acceptable to all professionals in the network.

We must also ensure that the notion of a joint report does not remove the 'permission' professionals have to differ in their view. Any differences need to be set out clearly. However, given that the group of professionals will have been working together as the Core Group, whilst there may be differences in emphasis and opinions, the Core Group should have already reached a very clear joint view of the needs of the child and what support is required to help meet thus needs.

So, again this concept moves thinking fundamentally away from the position of a case conference being the place where opposing views are played out and debated to a forum that is taking a one-step removed overview of the joint plans and interventions of a group of professionals. This is to be welcomed.

**11. Part 3: Child Protection Case Conferences:** The guidance suggests that ' *all participants at a CPCC with significant involvement with the child/family have a responsibility to determine whether or not to place the child's name on the Child Protection Register. Where there is a split decision, the Chair will determine the final decision.*' Do you agree with this approach?

Yes

### **Dundee CYPPC Comments**

The first key point that perhaps requires emphasising in the guidance is that all agencies involved with a child are not only responsible to determine whether child protection registration is appropriate, but are also bound by the decision.

There is a lack of clarity about the phrase 'split decision'. If this is taken to mean a group, say, of 10 split down the middle with 5 on either side of the decision, then the position of a Chair taking the decision is more acceptable than if the split in the group were, say 3 for and 7 against. So, the phrase 'split decision' does require further clarification. Does it exclude or include 'majority decision'?

### **12. Do you have any additional comments?**

In general terms and has been commented upon in various fora at which government officers have been present, the document would, we suggest, benefit from a robust editing procedure. There are a variety of writing styles employed, indicating the work of a number of authors has been included un-edited. In addition, the repetition of key points in different ways, at different parts of the document indicates the work of a variety of authors.

### **Dundee CYPPC Comments**

- Page 11

We consider paras 36 and 37 to be particularly helpful in terms of providing a national definition of child protection. Similarly, para 38 helpfully sets out considerations of Harm and Significant Harm. We suggest that a final sentence be added, "Paragraphs 39 - 43, below illustrate considerations that need to be taken into account when exercising that professional judgement."

- Page 42, Para 44, 4<sup>th</sup> line

'contradicting' should be 'contradictory'

- Page 13, Para 46.

This suggests that, "The Lead Professional should integrate..." Whilst we appreciate that this paragraph is not specifically about the role of the Lead Professional but about how he/she should carry out a particular task, nevertheless we suggest it makes a wrong assumption about the Lead Professional being the person who must always do this task. We suggest that the paragraph should be re-worded to make the point that the Lead Professional should ensure that the task is done, rather than necessarily being the one who does it in every case. In some instances it may be better done by another professional.

- Page 14, Para 15, Final bullet point

There are two very different tasks contained in this. They should be split into 2 bullet points; One referring to support through transition and, secondly, ensuring smooth transfer of responsibility.

- Page 23, Information-Sharing

We respectfully suggest that the section covered by paras 81 – 102 contains far too much detail, with repetition being a feature of that. The text leaves the reader with the view that all that has been written previously on the subject has been included for fear of missing something out. We believe that a robust editing process is required to end up with guidance that is relevant and accessible.

We are also mindful that good information-sharing is relevant to all services, not only those pertaining to the protection of children and young people. The concern is that every other area of activity, be it in the wider children's services arena or, for example, in adult protection, sets out guidance in information-sharing national policy and guidance documents. We would urge that there be one body of text relating to the subject that, if necessary, is replicated in the various documents that are produced.

Finally, in terms of the volume of text that is required to explain the subject, we are reminded of the brevity, simplicity and effectiveness of the letter issued by the then Chief Medical Officer on 23 September 2004 and commend it as an example of how the explanation of a complex subject can be well-crafted and made accessible to all practitioners.

- Page 30, Legislation

Again, as with information-sharing, it seems as if the need has been felt to pack this section with everything in order to miss nothing out. Indeed, para 103 states that, "it is also worth revisiting some of the core legislation", to which a legitimate response is 'Why?' It is available to be consulted elsewhere. We would question why this section needs to be part of the document at all.

If there is need for a summary of every piece of legislation that is relevant to or in some way related to the protection of children and young people to be collated in one place, then that could be in another document that could be accessible online for those who wish to read it.

The inclusion of this section in this document is, we suggest, unnecessary and merely serves to increase the size and make it less attractive in terms of contributing to inaccessibility.

- Page 41, para 148

This is, as we recognise is a straight lift of text from the existing guidance for child protection committees. However, given that it is, it needs to be edited for the purposes of this document. The question is – What guidance is deliberately directive? – The part about child protection committees, or this whole document in which this guidance on CPCs will now sit?

Again, a robust editing of the whole document is required.

- Page 41, Chief Officers' Groups

Nowhere in this section are we told who the Chief Officers are. The original guidance which this is to replace specified who were to be considered the Chief Officers for the purpose of the guidance. We suggest that needs to be brought back into this section.

- Page 49, Single Agency Roles and Responsibilities, Paras 176 – 224

We would ask what the purpose of this section is. Is it, for example, to provide a template for every area to replicate in its own local multi-agency procedures/guidance? Is it to set out a national statement as to what the role of all these single agencies must be?

For the purposes of guiding strategic and operational staff in local authority area across Scotland, we would again question the necessity for this section in this document. It might be that there is a need for a nationally agreed document that summarises what every agency involved in caring for children does, but we respectfully suggest that this is not the document in which that should be included.

- Page 58, 'Third Sector'

We welcome the inclusion of specific reference to the third sector. However, we believe the text is missing an opportunity to clarify the role of the voluntary sector.

The document notes the diversity of the sector, but does not take the opportunity to illustrate that there are some broad groupings and that this can help thinking when involving and supporting such organisations; e.g. services involved in direct provision to vulnerable groups; community based groups linked to universal provision; uniformed groups. It would be helpful to provide an overview of the broad functions, roles and responsibilities of these broad groupings.

It would also be helpful to set out guidelines in relation to the implications in law and in practice of third sector agencies providing a commissioned service on behalf of a local authority.

- Page 60, Leadership and Staff Development

We are delighted to see the use of the term Staff Development in the heading of this section, having long lobbied for its use as the appropriate term. Unfortunately, the following paragraph (225) then immediately reverts to the use of 'training'. We again suggest that training infers

something that is done 'to' people rather than conveying the sense of a partnership whereby the agency supports the individual to seek and make best use of learning opportunities.

- Para 227, Line 5.

Change, "... they were responsible." To "... they are responsible."

- Para 229

The purpose of this paragraph is unclear. It does not seem to add anything to the text. We suggest it is deleted.

- Page 61, paras 231-234

We suggest that this is another example of the need for robust editing. The content of these 4 paragraphs could be set out more succinctly in a few sentences.

- Page 62, paras 238 – 245

As pointed out above, the term 'Staff Development' in the heading to this section but not in this sub-heading to these paragraphs nor in the paragraphs.

We respectfully suggest that we are not going to achieve the cultural shift required to better define the role and responsibility of professionals and their connection to their employing agency, and the shared responsibility these have to develop the workforce, until we stop referring to them being 'trained' like some Pavlovian dog. Instead we should be referring to the workforce being developed to perform at peak ability.

- Page 67, Wider Planning Links

We welcome this section, covered by paras 251 – 290.

Again we suggest robust editing would tighten up the text. However, the section is concerned with promoting effective inter-agency and multi-sector, multi-service perspectives, planning and action and to that end is to be welcomed.

- Page 85, Recognition of Abuse, para 322

We would suggest that the importance of para 322 warrants it being given more prominence within the document. We consider that it provides guidance of such importance that it should appear before para 321 and in some way highlighted to draw attention to it.

We also suggest it would be helpful to state that practitioners will need to apply knowledge of resilience and attachment, as well as of growth and development, given the centrality of these two factors in determining how a child behaves and deals with particular situations.

- Page 88, para 337

We would respectfully suggest that there is an error in the description of a CAO contained in the first sentence. Whilst it is correct to state that only a local authority can apply for a CAO, it is incorrect to state that the only reason for doing so is because parents may be preventing the local authority from seeing the child. The need for the child to be seen because of a concern that he/she is or is likely to suffer significant harm, may have been assessed as being seen by a medical professional, not a local authority employer.

So the paragraph should state, "... significant harm and those with parental responsibility are preventing an assessment of the child being undertaken to confirm or refute that concern."

- Page 89, para 340, 2<sup>nd</sup> sentence

The guidance calls for police and social work to appoint 'senior' officers to be responsible for planning, co-ordinating, etc. We suggest that the term 'senior officer' may have a different meaning at local agency level than it is given in this document. We would suggest that this document refer to 'an operational manager'.

- Page 99, para 390

We do not understand why the requirements for attendance at a Transfer Case Conference should be any less than at any other type of Case Conference, which is covered elsewhere in the document.

We are pleased to see movement in position closer to that which we have advocated in the past – which the transfer case conference be convened by the receiving authority and that it, effectively, is that authority's initial case conference. That being so, the requirement upon all relevant

agencies in that local authority area plus social work and, preferably, health, police and education representatives from the originating authority area, should be present.

- Page 100, Para 393

We suggest that the third last bullet point is replaced to make the point more clearly than is the case as it stands. Because there will be no 'category of registration', it is imperative that there be absolute clarity in statements specifying the reasons for registration:

"ensure that the reasons for registration are stated, described and recorded in clear and unambiguous language so that:

- i. those responsible for developing and implementing a protection plan are clear as to the concerns to be addressed
- ii. measurement of progress towards addressing the concerns can be carried out subsequently"

- Page 101, Para 396

We welcome the notion that it should be clear who is required to be present at a CPCC as a minimum. However, we suggest there may be a more satisfactory way of setting expectations upon police attendance than to make attendance compulsory in this way. Despite police commitments to participate in all child protection matters, there may be occasions when police can convey information to a review CPCC without the need to be present at the meeting. So, whilst we endorse the call for a quorum as set out for initial CPCCs, we would suggest consideration is given to whether this same 'rule' need apply to reviews CPCCs.

- Page 109

We suggest that, at the outset of this section, it would be helpful to make a clear and unambiguous statement that the invocation of cultural norms and/or traditions as the reason for certain action and/or behaviour can never be a reasonable explanation for action and/or behaviour that is abusive or neglectful as that is understood and defined in Scots Law.

- Page 109, Para 429

We suggest an additional sentence is appropriate to help thinking when considering the impact of domestic violence - "Although all children and young people living within a domestic abuse household will be affected by the abuse in some way, it is not always the case that child protection procedures need to be invoked."

- We suggest that the subject of FGM, covered in para 491 - 496 and the following sub-section, 'Honour based Violence and Forced Marriage', should be brought together under one sub-section with three parts,

'Harmful Traditional Practices:

- Female Genital Mutilation
- Honour-based Violence
- Forced Marriage'

- Page 124, Para 494

We suggest amending the text in the last bullet point to read; "appropriate interpreters, who are totally independent of the child's family and any educational, religious or other community institutions that the child may attend, should be used if required.

- Page 124, Para 497

We suggest that the final sentence immediately before the list of bullet points is changed to; "... sufficient motivation for a child to be punished. These may include but not be solely confined to: ..."

- Page 127, Para 506

We suggest the inclusion of an additional sentence at the end of the paragraph to emphasise the point to all agencies involved in the matter that the child's welfare is paramount. This could be, "All agencies involved in the case must be mindful that the child's welfare is paramount and outweighs all other considerations. To that end decisions must be based on what is in the child's best interests."