

## Child abuse and neglect

**Consultation on draft guideline – deadline for comments 5pm on Wednesday 19 April 2017** email: [childabuse@nice.org.uk](mailto:childabuse@nice.org.uk)

	<p>Please read the checklist for submitting comments at the end of this form. We cannot accept forms that are not filled in correctly.</p> <p>We would like to hear your views on the draft recommendations presented in the short version and any comments you may have on the evidence presented in the full version. We would also welcome views on the Equality Impact Assessment.</p> <p>We would like to hear your views on these questions:</p> <ol style="list-style-type: none"> <li>1. Which areas will have the biggest impact on practice and be challenging to implement? Please say for whom and why.</li> <li>2. Would implementation of any of the draft recommendations have significant cost implications?</li> <li>3. What would help users overcome any challenges? (For example, existing practical resources or national initiatives, or examples of good practice.)</li> </ol> <p>See section 3.9 of <a href="#">Developing NICE guidance: how to get involved</a> for suggestions of general points to think about when commenting.</p>
<p><b>Organisation name – Stakeholder or respondent</b> (if you are responding as an individual rather than a registered stakeholder please leave blank):</p>	<p>Voice</p>
<p><b>Disclosure</b> Please disclose any past or current, direct or indirect links to, or funding from, the tobacco industry.</p>	<p>None</p>
<p><b>Name of commentator person completing form:</b></p>	<p>Ian Toone</p>

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Type		[office use only]		
Comment number	Document (full version, short version or the appendices)	Page number Or 'general' for comments on the whole document	Line number Or 'general' for comments on the whole document	Comments  Insert each comment in a new row. Do not paste other tables into this table, because your comments could get lost – type directly into this table.
1	Full	General	General	As a trade union, representing both teachers and support staff across all stages of education (from nursery to tertiary), Voice welcomes this guidance. It is very comprehensive in scope and the guidance is clearly expressed and based on sound evidence.
2	Full	General	General	The only concern we have is that the guidance is very unwieldy and so will be difficult to digest. In particular, practitioners may have difficulty navigating the document and finding the appropriate section when faced with an urgent incident. This could be ameliorated by better signposting and also by including hyperlinks (in the electronic version) or cross-references (in the printed version) to facilitate a search of related material. It might also help to divide the guidance into discrete physical units.
3	Full	General	General	<b>Re: Q1 – Which areas will have the biggest impact on practice and be challenging to implement?</b> Austerity has brought about a fragmentation of public services, such that there are now significant gaps in many central services, with a concomitant loss of essential experience and expertise. This means that some of the referral systems are not as efficient as they should be, and collaborative working between different agencies (education, health, social care, youth services and the police) can be fraught with problems, especially in terms of convening meetings (whether physical or virtual) and finding funds to facilitate inter-agency working.
4	Full	General	General	<b>Re: Q2 – Would implementation of any of the draft recommendations have significant cost implications?</b> There is a need for agencies to work together collaboratively, but cost-cutting and budget shortfalls can make this very difficult as intra-agency objectives tend to take priority over inter-agency ones and it is often difficult to justify (or trigger a protocol for) spending money beyond the parameters of the individual agencies. Also, where services have been cut back, specialisms may have disappeared and the whole service may be under too much strain to be optimally effective in meeting demand.

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5	Full	General	General	<p><b>RE: Q3 – What would help users overcome any challenges?</b></p> <p>Adequate funding is needed to maintain and develop essential central public services. Pooling resources between different local authorities may help, although so much has now been out-sourced to private providers that this is now much more difficult than it used to be.</p>
6	Full	General	General	<p><b>RE: Equality Impact Assessment</b></p> <p>We would take issue with the statement that disabled children are not considered to be a particularly vulnerable group. Many case reviews have pointed to the fact that disabled children have been targeted because disability has made them more accessible to abusers or less likely to be able to protect themselves or, in some cases (depending on the particular disability) to report or communicate abuse.</p>

Insert extra rows as needed

### Checklist for submitting comments

- Use this comment form and submit it as a Word document (not a PDF).
- Complete the disclosure about links with, or funding from, the tobacco industry.
- Include page and line number (not section number) of the text each comment is about.
- Combine all comments from your organisation into 1 response. We cannot accept more than 1 response from each organisation.
- Do not paste other tables into this table – type directly into the table.
- Underline and highlight any confidential information or other material that you do not wish to be made public.
- Do not include medical information about yourself or another person from which you or the person could be identified.
- Spell out any abbreviations you use
- For copyright reasons, comment forms do not include attachments such as research articles, letters or leaflets (for copyright reasons). We return comments forms that have attachments without reading them. The stakeholder may resubmit the form without attachments, but it must be received by the deadline.

You can see any guidance that we have produced on topics related to this guideline by checking [NICE Pathways](#).

**Note:** We reserve the right to summarise and edit comments received during consultations, or not to publish them at all, if we consider the comments are too long, or publication would be unlawful or otherwise inappropriate.

Comments received during our consultations are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the comments we received, and are not endorsed by NICE, its officers or advisory Committees.