

Introduction

The Royal College of Paediatrics and Child Health (RCPCH) is responsible for training and examining paediatricians. The College has over 17,000 members in the UK and internationally and sets standards for professional and postgraduate education. We work to transform child health through knowledge, research and expertise, to improve the health and wellbeing of infants, children and young people across the world.

General comments about the draft guidance

- The Government must allocate more financial resource in order for Local Authorities to implement the commitments and plans included in the draft guidance.
- Child health professionals must be included in the assessment process to determine whether a child is the victim of modern slavery and human trafficking.

Response to specific questions

1. Is there anything in the revised guidance which should be amended?

- a) The impetus is put on local authorities to have “a duty to protect and support these highly vulnerable children” (page 3, section 3). The Government also has a duty and obligation and the Government’s responsibilities should be included within the guidance.
- b) Children seeking asylum is said to be included in the guidance and so needs to be included within page 5, section 8, so that it is explicit and reads as follows: “The cohort of unaccompanied children, migrant children **including Asylum Seeking Children** and child victims of modern slavery includes a wide range of children...’
- c) It is important to include ‘healthcare professionals’ within page 10, section 17 as they have a large responsibility for care planning. Each professional group should have access to related health policies and guidance, which is provided by the RCPCH and listed as an additional resource in our response to question 3.
- d) Any specialist support provided by voluntary organisations must be subject to the same quality assurance as applied to statutory organisations (page 10, section 15).
- e) Revision is required to the process outlined on page 12, section 26-31. It is recommended that healthcare professionals are involved in crucial decision making made by ‘competent authorities’ when determining whether a child is the victim of modern slavery. The ‘competent authority’ needs to be defined and these personnel must have the necessary skills and competencies to carry out such assessments on this very vulnerable group of children and young people.
- f) There are no details about the additional resources required to implement the draft guidance. We strongly recommend that the Government specifies within the guidance information details of the additional organisational funding and staffing resource required for the provision of safe places (page 14, section 37), interpreters (page 15, section 41), specialist government advice (page 18, section 51) and other support including trauma-related therapy contained within guidance. Without specifying exactly what these resources will be, there is a risk that the guidance will be implemented inconsistently, resulting in this vulnerable cohort of children receiving different levels of service depending on where they live in the UK.
- g) We recommend that section 51 on page 18 should read: *‘Unaccompanied children, migrant children including Asylum Seeking Children and child victims of modern slavery will need access to...’*

h) We recommended re-wording the first three sentences on page 18, section 52, The sentences should read: *'As for any Looked after Child, a **timely** health plan and personal education plan should be produced as part of the overall care plan. The health plan should cover the children's state of health including their physical, emotional, **sexual** and mental health.'*

2. Is there anything further which should be added to the revised guidance?

- a) The guidance does not mention mental health within 'training and awareness' (page 10, section 16-24). We strongly recommend that mental health training should be included within this section so that professionals are fully equipped to deal with the mental health issues which this group of vulnerable children and young people might experience and display. RCPCH guidance on mental health and emotional wellbeing is available <http://www.rcpch.ac.uk/improving-child-health/child-protection/refugee-and-unaccompanied-asylum-seeking-children-and-youn-1> in addition to NICE guidelines on the management of PTSD¹.
- b) On page 13, section 35 social workers should be able to seek advice and understand the risk of infectious diseases, including sexually transmitted infections. Infectious diseases and sexual health advice should be sought and screening tests offered to the child or young person from the appropriate health professionals.
- c) On page 15, section 41 we recommend including consideration of the child's risk of post traumatic disorder¹ from the loss of family or bereavement that can last up to a minimum of 12 months, and which will require monitoring by social care.

3. Do you have any suggestions for further links or resources that could be included at Annex A of the guidance?

- a) We recommend including a link to the RCPCH refugee and unaccompanied asylum seeking children and young people webpage, available from <http://www.rcpch.ac.uk/improving-child-health/child-protection/refugee-and-unaccompanied-asylum-seeking-cyp/refugee-and-una>. This includes information and support for paediatricians in the assessment and management of children and young people of refugee background, with links to key external information and resources.
- b) Promoting the health and well-being of looked-after children: Statutory guidance for local authorities, clinical commissioning groups and NHS England, available from https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/413368/Promoting_the_health_and_well-being_of_looked-after_children.pdf
- c) Coram BAAF Adoption & Fostering Academy. PN 52. Adoption from abroad of a relative child, available from <http://corambaaf.org.uk/bookshop/pn-52-adoption-abroad-relative-child>
- d) We recommend including a link to <http://www.uaschealth.org/> which includes key documents, templates, tools and clinical guidance used in Kent to support the health needs of unaccompanied asylum-seeking children population. Many of these resources have been developed by subject matter experts and are published on this website for use within Kent and to share learning across the UK.
- e) We recommend including a link to the RCPCH Mind Ed education resource on children and young people's mental health for all adults. Available from <https://www.minded.org.uk/>, this website includes information and resources to help identify a child at risk of a mental health condition. The resource will be moving to the Health Education England resource hub www.e-lfh.org.uk after March 2017.

For further information about any aspect of this consultation response, please contact health.policy@rcpch.ac.uk

¹ <https://www.nice.org.uk/guidance/CG26/chapter/1-Guidance#recognition-of-ptsd>