

BY EMAIL

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Chair Service Framework Programme Board

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Dear Mr McBride

Re: Revised Service Framework for Mental Health and Well Being 2018-21 & Service Framework for Children and Young People

The Office of the Commissioner for Children and Young People (NICCY) was created in accordance with 'The Commissioner for Children and Young People (Northern Ireland) Order' (2003) to safeguard and promote the rights and best interests of children and young people in Northern Ireland. Under Articles 7(2) and (3) of this legislation, NICCY has a duty to keep under review the adequacy and effectiveness of law, practice and services relating to the rights and best interests of children and young people by relevant authorities. Under Article 7(4), NICCY also has a statutory duty to advise any relevant authority on matters concerning the rights or best interests of children and young persons. The remit of the Office includes children and young people from birth up to 18 years, or 21 years, if the young person has a disability or has been/is in the care of social services. In carrying out these functions, paramount consideration is given to the rights of the child or young person, having particular regard to their wishes and feelings. In exercising these functions, regard must also be given to all relevant provisions of the United Nations Convention on the Rights of the Child (UNCRC).

This letter concerns the Revised Service Framework for Mental Health and Well Being that is currently out for public consultation and the broader Service Framework for Children and Young People.

Revised Service Framework for Mental Health and Well Being 2018-21

The revised framework proposes to make considerable changes to pre-existing framework developed in 2010.

In the 2010 framework, Children and young people were referenced against a range of standards and key performance indicators; in the appendices specific policies and good practice guidance for children and young people were included. There was also a separate section which focused on specific conditions for children and young people i.e. Section 5: Standards for Specific Conditions – Children and Young People. The new revised version does not make any specific and clear reference to young people at all.

The revised version of the Service Framework states as part of the foreword that the Framework reflects the principles and values of the 'You In Mind' Regional Mental Health Care Pathway 2014. This is a pathway document for 18+ year olds. A specific pathway document was published in March 2018 for children and young people as part of the 'You In mind' series of guidance documents¹. No reference has made to the latter and as a consequence the revised document is based on standards that were specifically set for adult mental health services.

Based on reading the content of the draft framework, it is apparent that children and young people have been completely removed from the 2010 framework. However, neither the covering letter nor foreword specifically clarifies that this has been done apart from a general comment being made that the revised framework has taken a 'more streamlined approach with fewer standards.' There is no explanatory rationale provided for the decision to remove children and young people from the Framework or clarification that a specific service framework for children and young people is being developed that is based on the 2018 'Pathway for Children and Young People through CAMHS'.

Furthermore, nowhere in the consultation document does it clarify what age group is included in the revised framework. We therefore seek clarification on whether a separate service framework is going to be developed for children and young people and the process and timeframe for drafting, consulting upon and publishing this and whether it will require Ministerial appraisal to be implemented. If the revised framework is for adults only then this should be reflected in the document title e.g. 'Service Framework for Adult Mental Health and Well being 2018 -2021; the background section should also make this clear. We do not wish to assume, without clear evidence, that the revised framework is not intended for children and young people, therefore this letter is to seek clarification.

Although this letter is not to provide detailed comments on the consultation document, there is one comment we would like to make on the content of the revised framework that

¹ <http://www.hscboard.hscni.net/our-work/social-care-and-children/mental-health/>.

relates to 'Transitions' between children's and young people's and adult's mental health services. There are a range of issues as to how services work together when young people move into adult mental health services and this revised service framework (and any relevant others) is an opportunity to have a common or complementary standard or standards which specifically relates to children and young people for this stage. Alternatively, if the revised document currently out for consultation is intended for children's and young people's services then it would require revision / updating to adequately cover standards and indicators suitable for the 0-18 age group.

There is already very limited monitoring of children's and young people's mental health, including regular and regionally standardised evaluation of services; the removal of young people from the 2010 service standard creates a further gap in term of monitoring of services. The Service Framework for Children and Young People included some focus on emotional and mental health services, however, this has never been published. This framework was aiming to take a holistic view of children and young people's health and wellbeing which is central to child rights based and informed service planning and delivery. These are rights to which the NI Executive is committed through the UK State Party being a signatory to the United Convention of the Rights of the Child.

Service Framework for Children and Young People

We need to take this opportunity to highlight our significant concern at the 3 year delay in publication of the Service Framework for Children and Young People. This framework was consulted upon in 2015 but has never been published². We recognise that this was a substantial document which required the input of a range of departments and agencies. It is of serious concern that this important mechanism for monitoring the implementation of core standards across children's services has not been finalised. Many organisations, including NICCY³ took considerable time to respond to the consultation. This also included time given to respond to the proposals by children and young people themselves. The Department developed a specific consultation document for young people and at the time NICCY acknowledged the Department's compliance with its duties under Section 75 of the NI Act 1998, as well as international obligations under the UNCRC. This comprehensive service framework included a specific section that referred to children and young people's emotional and mental wellbeing i.e. Section 8 : Standards for Positive Mental Health and Emotional Well-being of Children and Young People.

It is our understanding that the Department remains committed to finalising and publishing the Service Framework for Children and Young People however, as this document was developed three years ago, we would be concerned that it is becoming progressively dated. The final

² Confirmation by telephone with DoH official- 13 April.

³ <http://www.niccy.org/publications/2015/january/30/advice-on-service-framework-consultation/>

publication of this document is now potentially further complicated and delayed because of the lack of a Minister to sign it off. We also recognise that staffing changes due to plans in respect of the HSCB are affecting the progress of work; however, it was expected that this service framework would have been published before the current administrative issues occurred.

We look forward to receiving clarification on the issues raised in this letter and would ask that you respond in writing at your earliest convenience. If you have any further comments or queries please do not hesitate to contact my office via john@niccy.org or cara-jayne@niccy.org

Yours sincerely



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