The Human Trafficking and Exploitation (Scotland) Act 2015 Section 11: Independent Child Trafficking Guardians

Consultation Analysis Report



Contents

1.	Background	3
2.	Consultation Summary	4
3.	Part One: Regulations Supporting Section 11(7) of the Human Trafficking and Exploitation (Scotland) Act 2015	5
4.	Part Two: Guidance	11
5.	Next steps to support implementation	16
6.	Annex A: Organisations who responded to the consultation	17

1. Background

In October 2015 the Scottish Parliament passed the Human Trafficking and Exploitation (Scotland) Act 2015 ("the Act"). The Act received Royal Assent on 4 November 2015.

Section 11 of the 2015 Act places a duty on Scottish Ministers to make arrangements for an Independent Child Trafficking Guardian (ICTG) to be appointed to assist, support and represent a child. The legislation stipulates that a child is entitled to a guardian if a relevant local authority determines that there are reasonable grounds to believe that the child:

- is, or may be, a victim of the offence of human trafficking, or
- · is vulnerable to becoming a victim of that offence, and
- no person in the United Kingdom is a person with parental rights or responsibilities in relation to the child.

The Act defines a 'child' as being under 18 years of age. It is the intention of the legislation that all children and young people who arrive in Scotland unaccompanied, and who will have undergone an arduous journey alone, are considered to be at risk of having been trafficked or becoming trafficked and would be referred to the ICTG for support. Only children who have been a victim, or who may be a potential victim, of human trafficking for whom no one in the UK has parental rights or responsibilities will be eligible for an ICTG. Existing legislative provisions and standard child protection processes and procedures will continue to be used by all relevant organisations. Local authorities will continue to meet their duties towards all children and young people for whom they have responsibility as set out in the Acts of the Scottish Parliament, which legislate for children and young people¹.

It is the intention that the functions of the ICTG must be such that they complement, rather than conflict or compete with, existing statutory roles. They should focus on where they can add value in supporting these eligible children and address any gaps in support which are needed to meet their specific needs. It is important that this service provides the same level of support for all eligible children and young people regardless of where they have presented in Scotland.

The development of the ICTG as a statutory body ensures that appropriate and compassionate support is in place for child victims of trafficking and, in line with the conclusions of the Independent Care Review published in February 2020, reiterates Scotland's responsibility to all unaccompanied asylum seeking children.

3

¹ Children (Scotland) Act 1995; Social Work (Scotland) Act 1968; Children's Hearings (Scotland) Act 2011.

2. Consultation Summary

The Scottish Government ran a consultation to seek views on the appointment, role and functions of the ICTG and wider operational issues. It ran for 12 weeks from 26 August 2019 to 17 November 2019 and asked 12 questions. Forty responses were received from 19 organisations, 18 Individuals and 3 who wished to remain anonymous. The organisations include third sector organisations, local authorities, social work bodies and others. A list of participating organisations is included in Annex A.

The consultation was split into two main sections: Part One (Questions 1-7) covered the statutory provisions set out in the Act and will help to inform new regulations to support the role of the ICTG; and Part Two (Questions 8-12) covered broader issues that will help us to design the new service and inform guidance to support that service.

This report sets out the responses received to the consultation and provides an analysis of these. It is important to note that the responses to the consultation are not representative of the whole population, however they are indicative.

The findings presented summarise the views of those who participated in the consultation for each individual question. The report aims to provide a balanced account of the views submitted by respondents. The findings provide a relatively high-level summary of a range of more detailed responses.

3. Part One: Regulations Supporting Section 11(7) of the Human Trafficking and Exploitation (Scotland) Act 2015

Part one of the consultation sought views on the provisions as set out in Section 11(7) of the Human Trafficking and Exploitation (Scotland) Act 2015. In terms of section 11(7) of the Act, Scottish Ministers have the power, by regulations, to make further provision about the ICTG, including in relation to a guardian's appointment and their functions.

The majority of questions for Part 1 included closed questions with "Yes/No/Don't Know" answers to be selected. Each question included a freeform text box for those who wished to expand their answers. Additionally, questions 3 and 4 included multiple part questions with freeform box questions for respondents to comment on.

The appointment of independent child trafficking guardians.

Question 1: We proposed appointing an organisation through an open and fair procurement/bid process to be responsible for recruiting guardians and assigning them cases.

A majority (92.5%) of respondents (37) agreed with the proposed method of appointing the service provider for the ICTG through an open and fair process, whilst 7.5% of responses (3) disagreed. A small number of responses (2) expressed that the current Scottish Guardianship Service, functioning since 2009, should be appointed to continue to provide the service on the new statutory basis. One individual respondent indicated some concern that a procurement exercise that resulted in the cheapest bidder winning could result in a poorer service.

Scottish Government Response: With significant support for the proposed approach for appointing guardians, we will proceed as planned with an open and fair procurement process for the new ICTG service.

Termination of the appointment.

Question 2: We proposed the appointment of an ICTG should be terminated using the normal procedures of the service provider.

There was general agreement from 75% (30) of respondents that the termination of an ICTG should be through the normal procedures of the appointed service provider. Some respondents elaborated further to specify that robust employment-related policies and procedures should be put in place by the provider and these should be in line with current employment law. Only 5% (2) of respondents disagreed with the proposal with no elaborated detail, and 20% (8) indicated that they didn't know.

Scottish Government Response: As there was general agreement that termination of an ICTG should be conducted through the procedures stipulated by the appointed service provider, this will be reflected in the development and procurement of the new ICTG service.

We agree that the appointed service provider's employment-related policies and procedures should be aligned with current employment law.

The conditions (including training, qualifications and experience) to be satisfied by a person to be eligible for appointment as an ICTG.

Question 3a: We suggested that an ICTG should, as a minimum requirement, have OISC (Office of the Immigration Services Commissioner) level 2 and a relevant professional qualification to SCQF level 8 (HND) in working with children.

There was general agreement from 77.5% (31) respondents, with 12.5% (5) respondents in disagreement and 10% (4) respondents indicating they didn't know. Those who disagreed thought that the OISC Level 2 qualification should not be a requirement at outset of employment, but something that could be worked towards in post. There was concern that experienced field workers who have significant experience of multiagency working and close working with victims of trafficking could be discounted from recruitment due to lack of specific qualifications. Demonstration of equivalent knowledge by other means should be used at the recruitment stage.

Training in advocacy skills and adherence to standards and a code of practice around advocacy similar to that published by Scottish Independent Advocacy Alliance was highlighted as beneficial to the ICTG role, as was having specific knowledge of functions relating to asylum and refugee protection and an understanding of trauma.

Scottish Government Response: While there was general agreement on the suggested minimum qualification of OISC level 2, we accept that there is merit in exploring the feasibility of the OISC level 2 qualification being worked towards while in post and as such, we will explore this when developing and procuring the new ICTG service.

Specific response to advocacy skills and standards will be addressed in the response to question 5.

Question 3b: We suggested that an ICTG should have an understanding and experience of the following:

- Child protection and looked after children guidance and procedures;
- The impact of trauma on children/young people;
- Communicating with children/young people through interpreters;
- Knowledge of UK and Scottish legislation on immigration, asylum, human rights, data protection, children and young people and agency duties to support them:
- Knowledge of key policies and procedures relating to above legislation;
- Awareness of age assessment guidance and procedures;
- Understanding of the distinct and cultural needs of separated children;
- Understanding of data protection and information sharing legislation and quidance;
- Experience of working with children/young people at risk; and

 Knowledge of child abuse and exploitation, trafficking indicators and the National Referral Mechanism or other relevant trafficking identification systems.

The majority of respondents (38) agreed that the above additional experience should be required or developed via training. Only one person (2.5%) advised that they didn't agree and another person (2.5%) indicated that they didn't know. One key stakeholder response suggested that a working knowledge of child protection procedures should be required rather than just an understanding. Additional suggestions included an accreditation through a regulatory body and experience of multiagency partnership working.

Scottish Government Response: There is overall support for the proposed range of additional experience that is desirable for prospective guardians. Responses indicated agreement that knowledge and experience can be developed through additional training in post. An additional suggestion of working knowledge of child protection procedures will be considered and reflected in the development of the specification for the role.

Suggestion has been made that it would be desirable for guardians to be accredited through a regulatory body. This will be addressed in the response to Question 3c.

Question 3c: To ensure the suitability and accountability of an ICTG, we proposed they must undergo a full Disclosure up to, and including, Protecting Vulnerable Groups (PVG) scheme membership and also register with the OISC.

All 39 respondents who answered this question agreed with this proposal and there was one person who did not answer the question. It was suggested in a small number of key stakeholder responses that an ICTG should be registered with the Scottish Social Services Council (SSSC).

Scottish Government Response: There is almost universal agreement that guardians should undergo full Disclosure checks including PVG scheme membership and this will be reflected in the specification of the role.

There is suggestion that the guardians should be registered with SSSC for additional accountability. We have explored this option and have deemed that this specific request is not feasible. Currently the SSSC registers professionals who work directly in the social care profession. The guardian, with its proposed role and functions, does not fall clearly into this category. There is clear benefit in a Code of Conduct for the guardians, in line with those already adhered to by members of organisations such as SSSC. We will explore how this can be incorporated into the specification for the role.

Payments to be made to, or in respect of to the role of, an independent child trafficking guardian

Question 4: We proposed that the service provider should set the salary and the policy for any additional payments to be made to the ICTG.

A majority of 82.5% (33) respondents agreed with that proposal, but said that salary should remain competitive and reflect the importance of the role. It was reflected in responses that Scottish Government should ensure that funding for the organisation is cognisant of this when setting funding levels. Where there was disagreement with the proposal, (15% [6] of respondents gave a negative response), it was suggested that this was due to concerns that the salary might be too low if a minimum was not set by Scottish Government. Only 2.5% (1) respondent did not provide a view.

Scottish Government Response: The specification for the new ICTG service provider will reflect that policy on additional payments will primarily be the responsibility of the service provider in line with the 82.5% of respondents who agreed with that proposal. The SG will consider levels of funding and measures to ensure ICTG salaries remain competitive and reflect the importance of the role. We will work closely with the service provider to ensure that salaries are aligned with Scottish Government fair work principles.

The functions of an independent child trafficking guardian

Question 5: We proposed that an ICTG should have responsibility for the following functions:

- Contribute to the safeguarding of the child or young person and specifically contribute to the prevention of (re)trafficking;
- Promote the best interests of the child or young person;
- Where the immigration status of a child or young person is not established, advise them as they progress through the immigration process, including on pathway planning for both positive and negative decisions on their status;
- Have regard to the duties of the public bodies who have statutory duties relating to these children and young people, specifically but not limited to local authorities, the Home Office and Police Scotland;
- Act in accordance with and assist local authorities as part of their plan for the support of the child or young person by:
 - Supporting them in dealing with the consequences of having been trafficked;
 - Supporting them through any appropriate referral mechanism for identification of trafficking, such as the National Referral Mechanism where they have been entered into by a First Responder;
 - Supporting them through any criminal proceedings against their traffickers, including understanding the process and managing expectations around prosecution;
 - Supporting them to access Criminal Injuries Compensation through the Criminal Injuries Compensation Authority (CICA) if required;
 - Supporting them towards independence to achieve the best outcomes and destinations for these young people; and
 - Supporting them in being active in the development of their support and pathway planning.
- Provide a confidential service according to data protection guidance and information sharing protocols: and
- When necessary, contribute to an age assessment in line with the Age Assessment Practice Guidance for Scotland.

A majority of 95% of respondents (38) agreed with the above functions of the ICTG, with some additional suggestions and caveats as highlighted below. Only one person (2.5%) advised that they didn't agree and another person (2.5%) indicated that they didn't know. Additional functions suggested were:

- Advocacy: There should be a specific advocacy function for the ICTG, promoting the best interest of the young person. They should be present at all key planning and decision-making processes and be responsible for ensuring the young person understands what is happening to them and why. It is also important to ensure that the young person's voice is heard and encourage their meaningful participation in decisions. Special mention was made in a number of responses relating to support being provided through the age assessment processes. It was highlighted how important it is that the young person understands what is happening to them to safeguard them against further exploitation and how valuable the ICTG's role is in assisting with this.
- **Asylum**: The consultation made provision for the guardian to provide immigration advice, however it was emphasised that there is a need for the guardian to provide support through the asylum process.
- Assistance: The ICTG should assist the young person in obtaining legal advice and representation, particularly if criminal action has been taken against a young person who has been exploited through forced criminality.
- Understanding of rights: The ICTG should have an understanding of a young person's right to support as a looked after child and should raise concerns with their local authority if they feel that support is inadequate.
- **Support**: The guardian should provide support for young people who are going through an age assessment process.

Scottish Government Response: There was overwhelming support for the suggested functions and as such these will be incorporated in the development and procurement of the new ICTG service.

Specifically on advocacy, we agree that aspects of advocacy apply to the role of the ICTG, as guardians will ensure that the child's voice is heard in any decisions made about them. However, we do not want to unduly restrict the functions of the guardian by limiting them only to advocacy as this is just one part of their role. In relation to standards and codes of practice concerning advocacy, as raised in question 3a, we will consider this as part of our development of a code of practice which relates to all of the functions of the ICTG.

On the four other additional functions, we broadly accept these and will take them into consideration when developing and procuring the new ICTG service.

Record Keeping

Question 6: We asked what records should be kept in regards to the ICTG, e.g. records of employment and training.

A total of 28 responses were received for this question, which generally indicated that the service provider should keep relevant records in line with organisational policies and procedures which will be informed by relevant employment law, data protection legislation and GDPR.

Scottish Government Response: The specification for the new ICTG service provider will reflect that they will be responsible for keeping all records relevant to the recruitment, employment and training of ICTGs in line with employment law, data protection and GDPR.

Vulnerable young people over 18

Question 7: We suggested that a looked after young person after the age of 18, in line with existing Continuing Care and Aftercare provisions, could continue to receive support from an ICTG.

All (40) respondents supported the proposal that an ICTG should continue to provide support for young people who turn 18 years of age prior to receiving a decision on their trafficking and/or asylum case. This support was considered essential to reduce the risk of re-trafficking.

Scottish Government Response: The specification for the new ICTG service provider and new regulations will reflect the strong support from 100% of respondents that an ICTG should continue to support young people after they turn 18. This is in line with their best interests and principles of Continuing Care and Aftercare provisions that allow a gradual transition from care into more independent supported living and to reduce the risk of young people being re-trafficked.

4. Part Two: Guidance

Part Two of the consultation sought wider views on the roles, responsibilities, and functions of an ICTG; that would inform supporting guidance for the role. The questions in this section were all open.

Consultation responses in this section will inform the development of the wider responsibilities of the child trafficking guardian and ensure that the best possible support is in place for trafficked children.

Support for victims of child trafficking

Question 8: We asked what additional support measures a child trafficking guardian could provide, or facilitate provision of, to best support trafficked children.

Of the 90% (36) who responded, all agreed that a guardian should provide additional support measures needed for trafficked children. The role of the guardian should be to help trafficked children navigate complex systems by providing advice and information, including on such topics as asylum claims and immigration, housing, care, counselling, accommodation, trauma support and child protection. In addition, some respondents thought advocacy should be a core part of a guardian's role in safeguarding and supporting children and young people. The role of the guardian needs to be flexible to ensure that guardians, alongside agencies, are able to act in the best interests of the child.

Respondents were of the view that guardians should have a strong link with agencies (including social work, housing and education) and work in partnership with them to ensure the child's health, accommodation and educational needs are met. Some indicated that guidance would need to be clear that any signposting or services the child would be referred to by a guardian, should come from the assessment and care plan carried out by social work and other agencies.

In addition to the core activities for an ICTG identified by respondents in answer to question 5, respondents identified the following as core support measures an ICTG could provide or facilitate the provision of:

- Providing help to access specialist victim support services, trauma support and counselling;
- Supporting access to translation and communication support;
- Supporting advocacy and the young people's views to be heard e.g. supporting access to Children Right's and Advocacy Services;
- Advocating on the child's behalf;
- Ensuring the young people's legal rights to remain are supported, providing signposting to local legal advice and advocacy;
- Facilitating access to hobbies, activities and participation groups to help them build relationships, confidence and life skills;
- Facilitating peer support with young people in a similar situations and befriending;

- Supporting the young people to get integrated into Scotland through supporting their cultural practices and connecting them with other young people in their local communities;
- Being a mentor and providing guidance on further education, employment opportunities and career options;
- Providing a safe space where young people feel relaxed; and
- Supporting the child to maintain family links and/or find family.

Scottish Government Response: Policy guidance to support the new ICTG service will reflect the proposed additional measures required specifically to support the needs of children and young people who have been victims of trafficking in line with 90% of respondents who agreed with these.

We will also reflect the need for all ICTGs to work closely and collaboratively with other agencies to ensure that children and young people being supported by the ICTG service can access the full range of advice and supports they need to integrate into community living.

Support to Prevent Re-Trafficking

Question 9: We asked what additional support, if any, could the ICTG provide to minimise the risk of vulnerable children and young people being re-trafficked.

Of the 87.5% (35) who responded, all strongly agreed that a young person should continue to receive support whilst it was needed. There were a number of suggestions about ways that this support could be delivered (e.g. group work, drop-ins, telephone or email contact).

Good quality support into education, employment, housing, social integration and community integration; as well as financial support, teaching in independent living skills and awareness raising about the risks linked to trafficking were also cited as strong preventative measures. Access to counselling, mentoring and peer support and stable, reliable and secure positive relationships were also important.

Robust multi-agency and good partnership communication and working to ensure the child is closely monitored; as well as strong care planning and a through care and aftercare support network being put in place, were also deemed essential.

Scottish Government Response:

As there was strong agreement that additional support should be provided to minimise the risk of re-trafficking whilst it is needed, this will be included in the development and procurement of the new ICTG service and will be supported by existing corporate parenting activity across those in the public sector with corporate parenting duties.

We broadly agree with the suggestions made in response to the additional support requirements. However, further considerations will need to be made to ensure that the role of the Guardian is complementary to the work of other statutory services and does not duplicate support being provided by other services.

Appeal Rights Exhausted

Question 10: We asked what support for Appeal Rights Exhausted (ARE) children and young people should the ICTG provide, and what additional support arrangements (if any) could be put in place to help the ICTG provide that support.

The general consensus among the 82.5% (33) who responded to this question was that children and young people who were deemed Appeals Right Exhausted were extremely vulnerable and at high risk of being exploited or (re)trafficked. All agreed that the ICTG should continue to support children and young people who have had their Appeal Rights Exhausted and many agreed that this should be at the same level of support as previously provided. The common view was that the ICTG's support should depend on the needs of the child and not their immigration status.

The assessment and care plan of the child should reside with social work. It was noted that there is an existing duty on local authorities under the Children and Young People (Scotland) Act 2014 to support children in need, therefore Appeal Rights Exhausted children and young people should have their basic needs met by local authorities. A number of responses from key sector stakeholders indicated that a guardian should continue to provide practical and emotional support alongside social work. Numerous respondents wanted to ensure this duty will be captured in the regulations for the ICTG.

Respondents felt that ICTGs will have a central role in signposting and providing advice and guidance on immigration and asylum processes. Similar to question 8 of the consultation which looked at what additional support should be provided by guardians, many respondents felt that the guardian had a central role in promoting the best interests of the child; empowering children to make informed decisions; providing guidance; advocating for their rights; providing support into employment when the young person has permission to work; and facilitating access to specialised services through the child care plan like counselling.

Given the change in a child or young person's legal status at this stage, many respondents were clear that a guardian has an essential role in ensuring the child or young person has the right legal support and representation. It was suggested that guardians could potentially provide support to engage with lawyers; get non-legal information about future options; support to engage with ongoing Home Office requirements; or potentially gather further evidence that may assist in the preparation of a fresh immigration claim (where appropriate).

For cases where the decision has been made by the Home Office that a child or young person will be returned home to their country of origin, respondents were clear that the guardian would have a key supporting role, given they would have developed a trusting relationship with the child. On a practical level, it was proposed that guardians could help the child prepare for leaving the country ensuring they have clothes, contact details, bank card, etc. and possibly help the child make contact with family in the country they are being returned to.

Scottish Government response:

There was general consensus that children should continue to be supported despite their status as Appeals Rights Exhausted. This will be reflected in the development and procurement of the new ICTG service.

We broadly agree with the suggestions of what this support should look like and will take these into consideration to ensure that support in these circumstances is appropriate when we are developing and procuring the new ICTG service.

Data Sharing

Question 11: We asked what information needs to be shared between the statutory professionals supporting the child/young person and the independent child trafficking guardian (whilst adhering to data protection and other information sharing principles).

Of the 92.5% (37) who responded, the majority agreed that proportionate and necessary information sharing in line with Data Protection and General Data Protection Regulation (GDPR) legislation and consent protocols would be needed to allow the ICTG and local authorities to carry out their legal duties towards the child or young person. The importance of this being carried out in an effective, accurate and timely manner were emphasised as being crucial to ensuring the wellbeing, safeguarding and best interests of the child; as well as in supporting the ICTG's role as an advocate for the child and to prevent re-trafficking. Data held by the local authority should be shared via pathway planning and child protection processes.

There were concerns raised about the inconsistency of current information sharing practice and whether information sharing agreements would be needed between the local authority and ICTG, with a call for clear guidance from the Scottish Government, particularly following the repeal of parts 4 and 5 of the Children and Young Persons (Scotland) Act 2014.

Additional appropriate information could be shared, provided the consent of the child or young person is given. Any child protection concerns the ICTG has would need to be shared with the local authority immediately.

Scottish Government Response: There is general agreement that data sharing principles should be in line with current Data Protection and GDPR legislation and this will be reflected in the specification for the role. In addition there is a request for clear guidance on how data should be shared between partners working on behalf of young people.

Complaints

Question 12: We asked, in the event that it is necessary for a complaint or grievance to be made about a child trafficking guardian, what procedures and processes should the service provider have in place to ensure accountability and quality improvement of the ICTG and the service.

From the 80% (32) of responses, two key themes emerged: general principles relating to complaints procedures; and ICTG specific suggestions.

There was significant agreement that the organisation must have clear and transparent complaint and grievance procedures in place that are understandable by both young people and professionals, and that these should be easily accessible to all. Complaints procedures should meet the standards as set out by the Scottish Public Services Ombudsman (SPSO). It was also highlighted that there should be clear routes for reporting and escalation of complaints and that there should be mechanisms for professionals to make complaints on the behalf of young people.

It was also suggested that as a practical measure, all organisational policies and procedures (including codes of practice) should be integrated into in-house training for staff, to ensure that the guardians fully understand what is expected of them and what the correct procedure is in the event of a complaint or grievance; and that this should be continually monitored and evaluated.

A small number of key stakeholders indicated in their responses that, given the statutory nature of the guardian's role, registration with the Scottish Social Services Council (SSSC) or another scrutiny body would be beneficial in providing reassurance and safeguards for those who use the service. In some responses it was suggested that, short of full registration with SSSC, codes of practice together with policy and procedures should be aligned with those of SSSC.

Scottish Government Response: It is generally agreed by respondents that a robust complaints procedure is necessary to ensure that all parties that are either supported by, or work alongside, guardians have a mechanism to address any concerns or grievances that may arise. It is intended that any contract holder will have robust complaints procedures in place and that this will be reflected in the specification for the new service. We would expect that any code of conduct would align with existing sector examples and reflect the SPSO guidelines. We will work with the contract holder to ensure that there is a robust complaints procedure in place.

5. Next steps to support implementation

Consultation feedback on Part One of the consultation will inform the drafting of regulations to support Section 11(7) of the Human Trafficking and Exploitation (Scotland) Act 2015. The draft Order will be laid in the Scottish Parliament by 28 January 2021, and accessible on the UK legislation website.

Subject to scrutiny and approval by the Scottish Parliament, this Order will ensure that the legislative framework for provision of the ICTG service is in place, and subject to Parliament's approval, this Order will come into force on 1 April 2021 prior to the implementation date of the new service.

We will use all of the information provided in the responses to Part Two of this consultation to help draft the specification for the new service and to inform guidance to support the new Independent Child Trafficking Guardian service.

We will advertise the tender and specification in summer 2020, and will invite applications from interested parties to manage the service. However, the impact of Covid-19 on the ability of interested parties to respond to the call for applications will need to be considered and monitored, and we recognise that we may need to extend the timescales originally planned to counter the impact.

It is anticipated that the new service will be in place in 2021.

We are immensely grateful to everyone who took the time to respond to this consultation and would like to thank them for the valuable contributions they provided.

We value the ongoing dialogue, and the work that all parts of the sector have undertaken so far towards making the new Independent Child Trafficking Service a reality for some of our most vulnerable children and young people.

6. Annex A: Organisations who responded to the consultation

Aberdeen City Council

Just Right Scotland

Barnardo's Scotland

British Red Cross

CARE

Centre of Excellence for Children's Care and Protection (CELCIS)

Clackmannanshire and Stirling Child Protection Committee

Convention of Scottish Local Authorities (COSLA)

Edinburgh Child Protection Committee

Educational Institute of Scotland (EIS)

Glasgow City Health and Social Care Partnership

Highland Child Protection Committee

NHS Tayside

Scottish Guardianship Service (SGS) (Scottish Refugee Council & Aberlour)

Scottish Association of Social Work

Social Work Scotland

South Lanarkshire Council



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