

ContactPoint Guidance

Summary Report to the Consultation Document

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Introduction

The consultation "ContactPoint: Consultation on Draft Guidance" ran from 4 May 2007 to 27 July 2007. **221 formal responses** were received. The consultation sought views on the draft ContactPoint guidance. The draft Guidance was issued under section 12(12) of the Children Act 2004:

Any person or body establishing or operating a database under this section must in the establishment or operation of the database have regard to any guidance, and comply with any direction, given to that person or body by the Secretary of State.

It sets out the key statutory requirements of section 12 and regulations made under it, and provides support to ensure the appropriate use and operation of the ContactPoint system. The statutory requirements apply to local authority ContactPoint Management Teams and those organisations named in Regulations (Children Act 2004 Information Database (England) Regulations 2007), as 'national partners'.

In addition, the guidance is aimed at those who will have access to ContactPoint as part of their practitioner/support role - ContactPoint 'users' and their managers.

Method

The consultation responses were gathered from the on-line response form (<http://www.dfes.gov.uk/consultations>), electronic MS Word documents, hard copy (downloaded or sent out by request) and free-text responses by email, post, web-questionnaire (Commission for Social Care Inspection - Ofsted), and email survey (British Youth Council, Triangle).

54% of all respondents answered by email; most of these attached the MS Word response form, with some opting to respond by email alone. 43% responded online using the electronic consultation form. 3% responded by post, either using a printed copy of the response form or gave their views by letter. We have not sought to define which respondent groups responded by which method.

In most cases we have sought to capture the breadth of statistical responses and comments related to each question. Where this has not been possible, we have tried to match statistical and narrative responses to related questions or incorporate them into Q.12 - 'general comments'. For example, two respondents sought clarity over the 'Shielding' process, in response to Q.9 (*'Is the draft guidance sufficiently clear about how ContactPoint will support practitioners working with children?'*), so these were added to Q.5 (*'Is the draft guidance sufficiently clear about how the 'shielding' of child records will operate?'*), responses.

In addition to the formal responses to the consultation, we ran a series of

three regional workshops with over 300 local authorities, local delivery partners and practitioners from across the children’s workforce. We also held a series of bi-lateral sector-based meetings with representatives from 38 organisations that work with or represent children and families including health, social care, police and youth justice, and voluntary and community organisations. We also met with the Information Commissioner’s Office, the Independent Schools Council and the Children And Families’ Court Advisory and Support Service - CAFCASS.

This summary statistical report contains an introduction, followed by a statistical analysis, summary, and respondents’ comments section, covering each question in turn and drawing out any issues raised.

Respondents

The consultation respondents described themselves as follows (shown below in descending order) - a fuller list of respondents is shown at Annex A:

Respondent Types	Responses	
ISA/ContactPoint Team	40	18%
Parent/Carer	39	17%
Child/Young Person	28	12.5%
Local Authority-Other	26	12%
Voluntary and Community sector	21	9%
Children's Trust/Children & Young Peoples' Strategic Partnership (CYPSP)	13	6%
Representative Bodies/Unions	13	6%
Other Respondents*	8	4%
Education-LA	6	3%
Education-School/College	6	3%
Connexions	5	2%
Health-(PCT/SHA)	4	2%
Youth Services	4	2%
Police	3	1%
Early Years and Childcare	2	1%
Social Care	2	1%
Youth Justice/Probation	1	0.5%
Total	221	100%

* Other Respondents included the Catholic Education Service; the

Information Commissioner's Office; NHS Connecting for Health; an amalgamated group comprising a number of bodies listed in the above table; and, an anonymous respondent.

Almost one-fifth of formal responses came from both ISA/ContactPoint teams and staff, and from parents/carers. Taking all local authority teams and staff involved in the Every Child Matters agenda, this figure becomes **36%** of all responses. Parents, carers, together with children and young people amount to almost **30%** of the total.

Several formal responses were sent by local authorities and organisations working with children, young people, parents and carers, who held local and regional consultation events in order to gather their views on the guidance. We also commissioned a number of organisations representing the views of children, young people, parents and carers, chiefly the British Youth Council, the Commission for Social Care Inspection (Ofsted), and Triangle. Between them, they consulted with a further 207 children and young people, and 82 parents and carers.

Way forward

During the guidance consultation period, regulations made under Section 12 of the Children Act 2004 (*The Children Act 2004 Information Database (England) Regulations 2007* - hereafter referred to as the 'ContactPoint regulations') were approved by Parliament. The regulations came into force on 1 August 2007 and provide the legal framework for the establishment and operation of ContactPoint. The guidance will be revised to reflect changes that were made to the regulations.

In addition to the ContactPoint guidance, the Government has been developing Best Practice Processes to support the management and use of ContactPoint. We believe that it is important that the guidance and Best Practice Processes are aligned and produced in formats which complement each other to ensure they are accessible and useful for ContactPoint management teams and users alike.

Following discussions with our delivery partners, we have decided that these materials should be published at least 3 months before deployment of ContactPoint to the 'Early Adopters' (17 local authorities and one National Partner – Barnardo's). This should ensure the Early Adopters have sufficient time to examine the materials and embed them within their organisations and practice before ContactPoint is deployed. It also enables them to prove the materials in a real, working ContactPoint environment.

Overview, Statistical Summary and Comment

The majority (**68%**), of responses from the ISA, ContactPoint and local authority respondent groups, upon whom this guidance places a number of direct statutory requirements, were positive about the content, clarity and format of the guidance. **58%** of children, young people, parents and carers were also positive about the guidance.

Whilst the guidance places a number of statutory duties on local authorities and National Partners, there emerged a clear feeling that local partners' responsibilities should be emphasised, and that emphasising legislative force/sanctions on all parties would help further establish this guidance. Relevant legislative force currently exist within section 10 ('duty to cooperate) and section 11 (duty to safeguard), of the Children Act 2004. Supporting practitioners in fulfilling their statutory duties under these sections is the chief purpose of ContactPoint.

A further theme emerged from the consultation was that although the guidance was clear about the principles and processes necessary to operate and use ContactPoint, the real difficulties were perceived as turning the theory into practice, especially as the draft guidance was issued almost one year before most people would start using the system.

A number of respondents - mostly those tasked with implementing ContactPoint at a local level - took the opportunity to comment on wider implementation issues, including the need to issue guidance alongside case examples, good practice and training documents, and although outside the scope of this consultation, it has nevertheless helped inform our decision to revise and sequence the guidance alongside these other key implementation support materials.

There needs to be a Good Practice/User guide	36%
There should be child & parent version/materials available	34%
Case studies would help	30%
The guidance is clearly written/jargon free	28%
Emphasise and link to accredited training	26%
Make stronger Every Child Matters reference/links	21%

Some respondents expressed criticisms about ContactPoint (opposition to its establishment and costs, and concerns about the impact on their privacy and its' scope), and not necessarily how the guidance will support the appropriate use of ContactPoint. Whilst these comments do not directly relate to the guidance, these views will inform our wider public communications strategy.

Questions

Q1: Is the draft guidance sufficiently clear about the importance of accuracy?

There were **209** responses to this question.

Yes	58%
No	16%
Not Sure	26%

Whilst it goes without saying that accuracy is vitally important, there were a number of significant respondent scores which indicate where these issues are most strongly felt, and which highlight the need to clarify the relevant sections within the guidance:

	ISA / ContactPoint Team	Parent / Carer	Child/ Young Person	Local Authority - Other	Voluntary and Community sector	Children's Trusts / CYPSPs	Education - School & LA staff
Yes	55%	32%	74%	69%	35%	54%	75%
No	18%	39%	7%	8%	5%	23%	8%
Not Sure	28%	29%	19%	23%	60%	23%	17%

Key themes emerging from the respondents to question 1 included:

Need to emphasise Partners' responsibilities	32%
Accuracy is vital	29%
Concern that there is no local authority control over quality / accuracy of (partners') source data	17%
It would be good practice to check the accuracy of data with the child/parent themselves where possible	14%
The guidance needs to convey more legislative force	13%

Whilst the guidance places a number of statutory duties on local authorities and National Partners, there is a clear feeling that local partners' responsibilities should also be emphasised, and that the legislative force/sanctions should also cover these users.

Relevant legislative force currently exist within section 10 ('duty to cooperate) and section 11 (duty to safeguard), of the Children Act 2004. We will make stronger reference to these sections with regard to applying the guidance principles to the use of ContactPoint.

The responsibility to ensure the accuracy of data held on ContactPoint is limited to how much data the local authority can themselves control. The limit on ensuring source systems' data accuracy extends to the ContactPoint system sending a 'discrepancy notice to a data supplier when data they send does not match that which ContactPoint holds. It is the responsibility of the data supplier (in this example), to ensure accuracy - this is a requirement of the Data Protection Act 1998 and stronger emphasis will be made to this effect. Checking the accuracy with the child/young person or parent/carer is a principle set out in the Information Sharing: Practitioners' Guide (<http://www.everychildmatters.gov.uk/resources-and-practice/IG00065/> - published April 2006), and will be re-emphasised.

Clarity was sought on a number of technical and operational matters:

'Data Verification' and measures/thresholds for data quality/accuracy	24%
Explain data dispute process	19%
'Stop Notices'	11%
'Best View'	10%
What timescales are local authorities expected to improve data quality / amend errors?	8%
The user and organisation 'Accreditation' process	6%
How will a child be 'allocated' to an LA and what does this mean in terms of service provision	5%
Explain 'Reasonable steps'	3%

These issues may be best dealt with in a 'User Guide' and appropriate references made or, brief descriptions of each to be included in the Glossary (Annex C of the Guidance).

Additional points made included:

Highly mobile children and those accessing services across LA borders are going to be the most difficult to maintain accurate records of	15%
Do not allow user-created records as this could lead to duplicated records and errors - let only the local authority ContactPoint create new records	11%
Human Error is still an issue which will affect accuracy	8%

Respondents' Comments:

The draft guidance does speak about the importance of accuracy but I am concerned that system will only be as accurate as the information that is input, and the due care of those doing the inputting. (Parent & Home Educator, Cynthia Needham)

What documents are uniformly going to be used by agencies to evidence accurate identification? Doesn't make clear that agencies need to keep records and evidence of how it proved accuracy of data. (Birmingham City Council, Roger Minchin)

We are confident that after extensive and wide-ranging discussions with DFES/DCSF, the guidance given on the accuracy of information is highly satisfactory. We are confident that following this part of the guidance will help organisation to satisfy the Data Protection Act's requirement to keep accurate and up to date records. (Information Commissioner's Office, Lynne Shackley)
The guidance could be further strengthened by including minimum standards to ensure and maintain consistency of practice across all organisations (Jacqueline Davies)

It is not sufficiently clear with respect to the LA's responsibilities when a data source is notified that data is inaccurate or out of date. Will the ContactPoint Management Team also be notified? (Portsmouth City Council, Karen Fill)

The fact that all users are responsible for the accuracy of the data in the systems they use is really important to stress as that puts the responsibility on everyone, not the ContactPoint Team or data managers. (Wandsworth Borough Council, Helen Miriam)

Although the guidance is clear, the accuracy of the database will depend on the effectiveness of systems used to check it. This will be most challenging for children whose family circumstances are changeable and those who move frequently, particularly those who move between England and other parts of the UK, or to other countries. (Family and Parenting Institute, Claire Jordan)

I don't think it spells out the consequences of non compliance to accurate record and procedure keeping which therefore reduces the clarity/importance of accuracy required. In some ways I think it needs to be more succinct and blunt for external approved users. (VCI GRID Reference Group, Matt Ford)

The guidance needs to be clearer regarding a Local Authority's responsibility to notify data sources about inaccurate data. The responsibilities should be included within the "accuracy" section as well as in the "amending and updating a child record" section. (Shropshire ISA team, Liz Nicholson)

3.24 suggests that it is good practice for users to verify new information provided by a child or parents/carers - If this is not current practice then it is unlikely that users will undertake this additional task unless there are other additional drivers for change (eg agreed local data quality policy). (Nottingham City Children's Services, Di Smith)

It is envisaged that Contact Point will be of greater benefit to those children receiving services above the universal service threshold. It would be useful if the guidance could therefore have a stronger emphasis on the role this group of staff can play in ensuring accuracy of Contact Point and therefore its long term usefulness in earlier intervention. (NSPCC, Kevin Brookes)

Guidance in section 2 & 3 directed to users could be more explicit in respect of the need for accuracy. (The Association of Directors of Children's Services, Richard Stiff)

The guidance doesn't make explicit partner's equal responsibility in upholding data quality. (City of Westminster, Nisha Munasinghe)

The guidance currently allows a practitioner to create a new record once a search has been completed. This could result in duplicate and inaccurate data. It should read that a record can be input manually only by the ContactPoint local team. (Luton Borough Council, Catherine Barrett)

As this responsibility is maybe not always fully understood in the world of practice, it could be expressed even more strongly. (Barnardo's, Pat Cummins)

Q2: Is the draft guidance sufficiently clear about how unauthorised access to ContactPoint and misuse will be managed?

There were **213** responses to this question.

Yes	46%
No	26%
Not Sure	28%

Significant responses from the main respondent groups are as follows:

	ISA / ContactPoint Team	Parent / Carer	Child/ Young Person	Local Authority - Other	Voluntary and Community sector	Children's Trusts / CYPSPs	Education - School & LA staff
Yes	59%	17%	68%	56%	32%	30%	58%
No	23%	44%	14%	24%	21%	46%	33%
Not Sure	18%	39%	18%	20%	47%	24%	9%

The **key themes** raised included:

Misuse - likely to occur	27%
Security still an issue	19%
Hacking - still likely to occur	10%
'Mediated access' - a security risk	18%
Too many local users to monitor or investigate	15%

Two **further themes** were raised by a small number of respondents: The burdens associated with securing enhanced Criminal records Bureau clearance, both for the service and the practitioner/employer (7%); and that password sharing is still endemic across some services and organisations, which may have impact on the degree to which ContactPoint is used appropriately in that service/organisation (4%). Whilst the first issue is beyond the scope of the guidance, we will reinforce the principles behind managing the latter.

Clarification was sought on the following topics:

'Misuse' scope	25%
Thresholds for/of unusual activity	17%
Monitoring suspected misuse and the investigation	17%

process	
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Linked to this were further questions about **closing/suspending 'User Manager' Accounts** (3%), The **appeals process** that a practitioner may use (3%), and **how/where to record the outcomes of the investigation**, including suspension and closure of accounts and further disciplinary activity (3%). These activities are most likely to appear within the Best Practice Processes Guide but references will be made to where these are described/located.

It was suggested that some elements of this subject could be more **emphatic** in order to convey their importance to all readers:

Emphasise staff managers responsibilities	27%
The importance of monitoring and auditing usage	23%
The legislative sanctions available to manage misuse	19%
Consistency is vital across LAs and services/ organisations	10%

It was also suggested that the language of this topic should be more **directive**, replacing '*should*' with '*must*' throughout (5%). The importance of training, although beyond the scope of this guidance, should also be emphasised (4%).

Further comments and questions included 'Who oversees local authorities and national partners' ContactPoint management teams? (4%); where possible, managing suspected misuse of ContactPoint should closely tie-in with existing organisational policies and practice (5%); and, it would be good practice to inform parents of any action being taken as a result of misuse (3%). Again, the guidance will make these areas clear.

Respondents' Comments:

I have read the summary guidance and am content with the proposed guidance which all seems sensible from our point of view, and addresses any concerns we had previously about security and access to the system (in terms of vetting and barring the key staff). (11MILLION.org.uk, Claire Phillips)

The guidance is very clear on this and whilst it is extremely important to minimise the risk of misuse of the system this needs to be balanced against the need to encourage those with legitimate reasons for doing so to access ContactPoint. In its present form there is a risk that the guidance will discourage practitioners from legitimately accessing the system through fear of being investigated on suspicion of misuse. (Connexions Cornwall and Devon, Jenny Rudge)

4.28 – it would be helpful if ‘periodically’ was properly defined. Is the intention that this should be weekly, monthly, quarterly, or other? (Portsmouth City Council, Karen Fill)

Would suggest stronger wording like ContactPoint users should not access records of their own children etc. as opposed to not appropriate. No mention is made of the potential effect the misuse may have on their status within the VBS. (Nottinghamshire County Council, Sean Kelly)

We are confident that the organisational and technical aspects of protecting ContactPoint from misuse have been addressed robustly in the guidance. It is also very important that any security breaches are properly investigated and acted on promptly, in order to reduce the risk of recurrence. (Information Commissioner's Office, Lynne Shackley)

LA has the responsibility to give access to users in Partner organisation. To do this that LA has to limit liability and responsibility which will require drawing up legal agreements with partner agencies. To ensure a standard approach and reduce legal costs, please provide template and guidance on this matter. (Leicester City Council, Andrew Bunyan)

3.9 This section should be strengthened. For example, accessing the records of a neighbour's child, in the absence of a legitimate professional relationship, is more than ‘not appropriate’ but a serious invasion of privacy. This must be made clear in the guidance. (General Medical Council, Suzanne Fuller)

Some parents felt that the restrictions and safeguards were enough to prevent misuse. Others felt that the measures did not go far enough. Some parents were sceptical about the success of the restrictions in practice e.g. professionals allowing access to support staff. (ParentlinePlus, Jan Fry)

Punishments for misuse of ContactPoint should be appropriate to the nature of the misuse, with strong sanctions for the most serious incidences. (Young person, Ofsted consultation group)

Checking Contact Point, by a head teacher when considering a child, may well be appropriate use if the head teacher wished to ascertain what other services if any are being provided for a child. A head teacher may genuinely wish to ensure a child is well supported with a new school placement. (Greater London Domestic Violence Project, Jo Sharpen)

The consequent issues arising from failure to operate the data system within legally defined parameters are clear. This is a framework which local authority children's services staff are familiar with. (The Association of Directors of Children's Services, Richard Stiff)

The idea of checking the person who wants to look at the information's identity is a good one. Preventing Paedophiles looking at children's records (Triangle (CYP consultation), Ariel Katz)

What exactly is an investigation of practitioner? (Birmingham City Council, Roger Minchin)

While the guidance attempts to minimise security risks, we remain concerned that the greater the number of people who have access to the data, the greater the risk to security, and the greater the scope for abuse of the system. (Family Education Trust, Norman Wells)

Local authorities and their national partners are bound only 'to have regard to' this guidance, which means, as stated in the guidance, that they may, where they have clear and justifiable reasons for doing so, depart from it. ISC advises that the language should be strengthened to read 'A number of key principles must be observed, as a minimum, by everyone with access to ContactPoint'. (Independent Schools Council, Simon Whitbourn)

This guidance did not go far enough to allay concerns – language such as 'should not be used' was not strong enough, parents were looking for absolutes (ParentlinePlus Parents Group 8, Sue Pedley)

Clear about what is misuse but not clear as to how this will be managed locally (Anonymous)

While the guidance is clear that mediated access supports one registered user providing remote access to another registered user, guidance should include scenarios where involvements are attributable to a team rather than to an individual. (Sheffield City Council, Ged Warren)

We would suggest that this guidance should link to Working Together guidance and the referral to LADO, as misuse of ContactPoint is of itself a safeguarding issue. (CAFCASS, Chelsey Bonehill)

Agencies will need to include reference to use/misuse of data and ContactPoint specifically in their policies and procedures (ContactPoint Project Board, Harry Darby)

Q3: Is the draft guidance sufficiently clear about an individual's rights to see information held about them?

There were **205** responses to this question.

Yes	58%
No	21%
Not Sure	21%

Significant responses from the main respondent groups are as follows:

	ISA / ContactPoint Team	Parent / Carer	Child/ Young Person	Local Authority - Other	Voluntary and Community sector	Children's Trusts / CYPSPs	Education - School & LA staff
Yes	74%	41%	74%	69%	25%	46%	67%
No	21%	19%	15%	15%	50%	23%	15%
Not Sure	5%	41%	11%	15%	25%	31%	16%

To support these 'subject access rights', it was suggested that a range of national **centrally produced materials** for children and parents was developed, together with two ContactPoint-specific templates which should be included in the revised guidance: (12%), and a (8%).

Need Children, young people and families' versions/materials	24%
Need a ContactPoint subject access request form	9%
Need a ContactPoint fair processing notice	8%

For this process to work, it was suggested that ContactPoint must engage the public (8%), and that the process of correcting errors must be transparent and effective (7%).

Clarification was sought on the subject of assessing a young person's competency to request to see their ContactPoint record, and decide whether their parent/carer can also see it or act on their behalf in order to see it:

Explain ' <i>Sufficient Understanding</i> ' and make reference to ' <i>Fraser Guidelines</i> '	40%
Explain the process and what's needed in order to verify/Prove the ID/Relationship of the child/young person, and a parent or carer	14%
Refer to local policies	14%

Explain how/where a child with 'sufficient understanding can withhold consent for parent to see their ContactPoint record	13%
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Further clarification was sought on the process for managing access by estranged / separated parents to their child's ContactPoint record (4%); what is meant by '*Public Interest*' (3%); and how, where known, will errors be corrected and action recorded (2%). Subject access requests are not a new process. Many organisations will have procedures in place to manage these and ContactPoint and the guidance will seek integration into these existing processes.

Respondents' Comments:

What about where a child withdraws consent for a service to share? Does this only apply for this service and at this point in time forwards? Or would it be retrospective for this service in the past? (Leicester City Council, Lez Bullwer)

Whilst accepting that the judgement about "sufficient understanding" and the right to consent is difficult, our experience is that many services pay far more attention to the parent or carer's perspective than the young person's. (Youth Start, Paul Boyden)

It is not clear if a practitioner who is able to verify a child/YP/parent/carer identity can show the details held on the screen. (Darlington Borough Council - Children's Services, Ann Lovegreen)

The section detailing subject access requests was particularly helpful. 4.12 – This level of detail in the guidance is welcomed. (Hartlepool Borough Council, Terry Maley)

No mention of access by parents to children's records which may not be in the best interest of the children - this is a constantly raised query with Legal Services Parents/Carers role is also covered, but only in the flow chart, the need for this person to hold must be made clear in the body of the Guidance (East Riding of Yorkshire Council, Lee Butler-Johnson)

we feel that if an individual is acting for another they must say why and have an appropriate position to act for the child/young person (Barnsley Youth Council Response (3 groups), Mark Lowe)

Perhaps it would be appropriate to include a reference to more guidance being available with regard to Subject Access Requests on the Information Commissioner's website – www.informationcommissioner.gov.uk (The British Computer Society, Liz Long)

Although, this part of the guidance is good, we think there should be more emphasis on the need to make it easy for members of the public to exercise their right of access. (Information Commissioner's Office, Lynne Shackley)

Who in the future will tell parent/carers about ContactPoint? – at the time of birth, what about children coming into the Country? – Immigration Service. (North Somerset Council, Sally Milton)

The guidance should also be clearer about whether ContactPoint data should be included in a response to a general request that does not specifically refer to ContactPoint. (Hertfordshire County Council, Ann Domenev)

Will who has looked at a record be included in the SAR? (North Yorkshire Children and Young People's Strategic Partnership, Gemma Ingles)

We are pleased that the guidance has taken into account the feedback given in the previous consultation on the regulations and acknowledges that client access should be handled within the framework of the current robust local authority procedures. (Royal Borough Kingston upon Thames, Duncan Clarke)

It is important to recognise young people's right to keep information confidential from their parents/carers. (Derby City Council, Lisa Melrose)

It may not be suitable to provide lengthy guidance on this issue within the CP document, however a reference to a suitable source of guidance on consent and competence would be welcome. (National Children's Bureau, Zoë Renton)

It should be easy for children or young people to request access to the information held about them on ContactPoint. (Young person, Ofsted consultation group)

The guidance was thought to be fairly standard data protection rights It gave parents reassurance that they could ask for corrections, but also suggested – by definition – that the data may not be accurate (ParentlinePlus Parents Group 2, Sue Pedley)

They also wanted to know if they would be made aware when someone accessed their child's record, and felt they had the right to know this All parents thought that the guidance was clear about their rights here and clear about what they should do They questioned if parents were separated or divorced, where did they stand in terms of access to this information? (Parentline Plus Parents Group 6, Sue Pedley)

Residency and shielded information may cause some issues when a subject access request is being verified for those children/families at high risk and in safe accommodation. (The Haven Wolverhampton, Popinder Kaur)

Paragraph 4.13 covers correcting information held by ContactPoint. I assume the procedure and rules for amending disputed information would be as is set out in the Data Protection Act however it would be helpful to refer to the DPA rules in this section so that there are clear signposts to how the dispute can be resolved. (Northumberland County Council,, Marilyn Iley)

Care should be taken to ensure that disclosure does not place the child or others at risk of harm. (London Borough of Croydon, Tony Bristow)

The Fair Processing Notice that Authorities are obliged to publish for ContactPoint will need to point to this guidance. (Birmingham City Council, Roger Minchin)

It may be helpful to strengthen the language in this section to stress the fact that children and their parents or carers have the right to see information held about them providing they meet the above criteria. (Family Policy Alliance, Claire Kober)

We would like to see more detail about how parents and children will be informed nationally and locally about ContactPoint and the means by which they can check their record and challenge incorrect information. (Family and Parenting Institute, Claire Jordan).

There seem to be few processes in place to identify errors in data held on ContactPoint, other than relying on information resulting from a subject access request. (Children's Rights Alliance for England, Sam Dimmock)

Q4: Does the draft guidance sufficiently explain how local authorities are required to manage complaints relating to ContactPoint?

There were **188** responses to this question.

Yes	65%
No	15%
Not Sure	20%

Significant responses from the main respondent groups are as follows:

	ISA / ContactPoint Team	Parent / Carer	Child/ Young Person	Local Authority - Other	Voluntary and Community sector	Children's Trusts / CYPSPs	Education - School & LA staff
Yes	82%	29%	78%	69%	28%	69%	67%
No	8%	33%	15%	15%	22%	8%	8%
Not Sure	11%	38%	7%	15%	50%	23%	25%

The consultation on draft ContactPoint Regulations (The Children Act 2004 Information Database (England) Regulations 2007, which came into effect on 1 August 2007), initially proposed that a complaints mechanism be set up specifically related to the access to, and accuracy of ContactPoint. There was a clear indication from respondents (to the Regulations consultation), that there should be procedures for managing complaints about the operation and use of ContactPoint. However, some respondents felt that the procedures must cover *all* agencies and local authority respondents felt that embedding it within their existing arrangements was the best approach.

Since drafting this version of the guidance (v.1.0), it was decided therefore not to place a specific requirement on local authorities to make arrangements for complaints about ContactPoint. Instead, the revised guidance will recommend that the process for making a complaint about ContactPoint is made clear within existing procedures in local authorities, national partners and other agencies. However, like subject access requests, there will be a number of key principles (minimum standards) which relate specifically to ContactPoint, to allow full integration into existing local and national processes. Additionally the guidance will recommend that promotion and publicity materials to support the implementation and ongoing operation of ContactPoint are clear about how a person can see their ContactPoint record, and how a complaint can be made, both in a format which is readily accessible to the public, and understood by young people.

A number of respondents to this consultation question echoed our decision, and gave **additional suggestions** which accord with our decision:

Better to explain/refer to existing local authority and partners' complaints mechanisms	31%
Important to emphasise partners' responsibilities regarding use, accuracy and complaints	19%
The accountability of local authorities and partners is paramount	16%
The guidance must explain the scope of complaints beyond local authority responsibility	15%
Any complaints mechanism must be transparent and effective	14%

To support this, **further comments** included:

Nationally and locally materials for children, young people and parents must be produced and made available	11%
It is important to signpost (for young people) where help to make a complaint can be found, including support and advocacy services	9%
The process needs to be very clear - who to contact, where they are, how long will it take etc.	9%
Needs to be an effective escalation process if unsatisfied	6%

Respondents' Comments:

There are far too many people or agencies against whom one might wish to register a complaint. Finding the correct authority to complain to may not be as simple as you would like to make it appear. (Parent & Home Educator, Cynthia Needham)

How does this fit with Health, Police and other agencies' complaints procedures ? (Hampshire County Council, Simon Cull)

It would also be important, as a point of good practice, for local authorities to include information on independent advice and/or other local agencies that children, young people and their parents/carers can approach to provide support in making a complaint. (The Warren Young People's Resource Centre, Lynette Green)

Although it is suggested that Local Authorities may choose to integrate arrangements for handling ContactPoint complaints with existing local procedures, it could be useful to look at incorporating aspects of local NHS complaint procedures. (Royal College of Midwives, Louise Silverton)

We are pleased that the guidance has taken into account the feedback given in the previous consultation on the regulations and acknowledges that client complaints issues should be handled within the framework of the current robust local authority procedures. (Royal Borough Kingston upon Thames, Duncan Clarke)

It is likely that local authorities will be using this guidance to inform their own information leaflets about Contact Point so a clear and concise explanation with respect to this matter is essential. (NSPCC, Kevin Brookes)

Clear from the Local Authorities point of view but will need robust process from Local Authorities detailing how they will manage this process with “other persons and bodies” authorised to use Contact Point. (Connexions Cumbria Limited, Mark Bowman)

All partner organisations should have existing complaints procedures in place which can be used to address these complaints. Complaints relating to subject access requests or freedom of information should be handled by the relevant data protection officer in line with existing procedures. (Birmingham City Council, Roger Minchin)

The arrangements proposed in the guidance place significant demands on local authorities for the operation of ContactPoint in a number of areas without any provision of the resources required to do this. The procedure described is reasonably clear but will be difficult to deliver. (The Association of Directors of Children’s Services, Richard Stiff)

Parents wanted to know the process and time period for resolution They also wanted to know what accountability the complaints manager had and if the complaints process would be audited/checked (Parentline Plus Parents Group 3, Sue Pedley)

Parents wondered how complaints could be made – in person, by phone or by email. They expected all of these channels. They also did not feel it was clear how the complaints procedure would be made ‘freely available’ (ParentlinePlus Parents Group 9, Sue Pedley)

LAs should ensure they have written guidance available on this as part of their complaints procedures. (The Haven Wolverhampton, Popinder Kaur)

4.19 makes a clear distinction between those complaints which a Local Authority will manage and those which will be passed on to National Partners or others. (Barnardo’s, Pat Cummins)

4.17 The phrase ‘use of ContactPoint by authorised users within that authority’ should clarify that this refers to users provided with access by that authority. (Nottingham City Children’s Services, Di Smith)

Whilst the Local Authorities responsibilities in relation to handling complaints is made fairly clear, the responsibilities of partner organisations need to be

similarly clear, follow similar procedures and be subject to ratification and monitoring. (Derby City Council, Lisa Melrose)

(Parents) wanted to know how long it would take to have the complaint resolved and if there was an appeal process (ParentlinePlus Parents Group 1, Sue Pedley)

Why not use existing complaints procedures? I can see problems when the ContactPoint team deal with complaints involving non-local authority practitioners, i.e. those that the local authority is not responsible for. (Staffordshire Children's Trust, Michael Wood)

Guidance on minimum standards for complaints procedures would make these more consistent across LAs and partner organisations. (The National Youth Agency, Sarah Hargreaves)

Yes on the whole. However, it could make more specific reference to how to manage complaints from children and young people, and in particular who can act on behalf of a child or young person. No mention is made of a requirement to provide an advocate for a child or young person in these circumstances. (CAFCASS, Chelsey Bonehill).

Q5: Is the draft guidance sufficiently clear about how the ‘shielding’ of child records will operate?

There were **189** responses to this question.

Yes	48%
No	31%
Not Sure	21%

Significant responses from the main respondent groups are as follows:

	ISA / ContactPoint Team	Parent / Carer	Child/ Young Person	Local Authority - Other	Voluntary and Community sector	Children’s Trusts / CYPSPs	Education - School & LA staff
Yes	11%	21%	70%	54%	33%	38%	45%
No	47%	50%	15%	38%	33%	46%	19%
Not Sure	42%	29%	15%	8%	33%	15%	36%

A number of **clarifications** were sought, including:

Clarify the decision to ‘shield’, review and ‘un-shield’ process	25%
Clarify the ‘shielding’ scope and criteria	24%
Clarify what remains visible	12%
Who will make up the ‘shielded records panel’	12%
How will a ‘shielding’ request from a case management system affect a child record where other ‘shielding’ is not in place	8%
How and where to record any ‘shielding’/‘un-shielding’ decisions	4%

To support this, the following **suggestions** were made:

The guidance needs to include case examples	15%
This process needs to be consistently applied across all agencies and authorities.	8%

A number of specific **scenarios** were suggested, both for clarification and possible case examples/flowcharts:

- 'Shielded' records of adopted children
- Subject access requests to a 'shielded' record
- Emergency/urgent/out-of-hours and mediated access to a shielded record
- Link 'shielded' records decision/process to existing child protection procedures

A number of respondents suggested that some parents would wish to use the 'shielding' process in order to opt-out from having their children's details on ContactPoint, and using this as a way in which to withhold consent (4%).

Respondents' Comments:

Will this prevent one agency disclosing information to another agency, on the basis of confidentiality? or parental consent, this is already a barrier to information sharing. (Keith Bates)

Guidance needs to make explicit that "celebrity children" should not be shielded unless they are at risk of significant harm. (Hampshire County Council, Simon Cull)

Timescales needed for consultation periods on shielding records. (Barnsley, Directorate for Children, Young People and Families, Julie Govan)

We asked a number of people to read the "shielding" section in the draft guidance and found that all have differing interpretations of how the system is intended to operate. (Education Otherwise , Fiona Nicholson)

In agreement as long as shielding is used for the purposes outlined above, and not as a way of not disclosing information to other partners. (Nottinghamshire County Council, Sean Kelly)

We have discussed the issues around shielding and sensitive records with specific services, such as womens aid, to arrive at local protocols for managing this. (Bolton Council, Gillian Clayton)

We are pleased that provisions have been put in place to shield records where there is a particular risk to an individual. (Information Commissioner's Office, Lynne Shackley)

There is a need for shielding guidance nationally so that shielding decisions are applied consistently across all LAs & their partner organisations. (Nottinghamshire County Council, Bev Cameron)

Informed consent will be required for "sensitive subjects" - perhaps sensitive subjects are the ones that really do need to be on? (VCI GRID Reference Group, Matt Ford)

If during a search a user is not able to see which LA area a child is in how will they know which is the relevant LA ContactPoint Team when requesting further information. (Hertfordshire County Council, Ann Domeneay)

The guidance states that they must act 'promptly' if they are concerned that, should information about a child remain visible, they could be at risk of significant harm. It may be useful to suggest a time period within which users should take action. (Family Policy Alliance, Claire Kober)

It is also important to remember that a proportion of ContactPoint users will be perpetrators themselves and as such we welcome section 3.10 which states that users access will be recorded by an audit trail, specifically if a user is searching for members of their own family or friend's family members. (Greater London Domestic Violence Project, Jo Sharpen)

Para. 4.63 The advice on shielding records seems to be appropriate – particularly the emphasis on taking account of the circumstances of the child rather than having to satisfy bureaucracy first. (London Borough of Croydon, Tony Bristow)

It should be made explicit that shielding a record is not a substitute for a safeguarding process. The language in the USERS box should be more direct. (Barnardo's, Pat Cummins)

We would also suggest that there should be the opportunity for parents or children to appeal against a decision either to refuse to shield or to shield as appropriate. (Independent Schools Council, Simon Whitbourn)

The problem with this provision, as with the regulations, is that it does not appear to shield the name of the carer or parent (or prospective adoptive parent). In some cases, the identity of the carer will also need to be withheld. This is a flaw in the regulations. (BAAF, Deborah Cullen)

Parents could foresee instances where this was appropriate, and understood the need primarily to keep addresses secret from abusive partners (ParentlinePlus Parents Group 8, Sue Pedley)

Shielded data is more likely to arise where there is a lead professional. Or there is probably going to be some expectation that the lead professional should take this role. Therefore it might be useful to address this one way or another in the guidance. (BASW, David Barnes)

Will the system ensure that they are protected against members of their family who may abuse them and want to find out where they live (Stafford and Stone District Youth Forum, Sal Thirlway)

Q6: Are the flowcharts helpful in explaining processes within this guidance?

There were **185** responses to this question.

Yes	84%
No	5%
Not Sure	11%

Significant responses from the main respondent groups are as follows:

	ISA / ContactPoint Team	Parent / Carer	Child/ Young Person	Local Authority - Other	Voluntary and Community sector	Children's Trusts / CYPSPs	Education - School & LA staff
Yes	87%	70%	88%	85%	89%	92%	80%
No	3%	13%	8%	4%	0%	8%	0%
Not Sure	10%	17%	4%	12%	11%	0%	20%

A number of respondents linked their **comments** to those for question 11 (Colour-coded guidance boxes), therefore a number of themes are similar. Overall the main comments were positive:

Clear and easy to follow	30%
The colours and flowcharts are very helpful	29%
The flowcharts make many of the processes very clear	20%

Suggestions included:

Embed the flowcharts within the relevant text/section	12%
Improve cross-references between the text and the flowcharts - use hyperlinks if publishing online.	8%
Make the flowcharts available electronically and in an editable format so local authorities and agencies can insert contact details or references to local procedures	6%
Make them available separately for laminating. As wall-charts and quick-reference guides	4%

The range of suggested **additional flowcharts** included:

- Local authority to local authority record transfer when a child/family moves
- What to do when a child leaves England
- A diagram showing Data source connections and how they relate to ContactPoint
- Emergency access to a 'Shielded' record
- Data Supply/Termination
- Managing a subject access request to a 'shielded' record
- The accreditation process for users and partner organisations

Respondents' Comments:

Good use of colour code to identify specific groups at a glance. Executive summary could also be colour coded in the same way for easy access to information. (Newcastle City Council, Linda Wafer)

The colour coding for different types of user makes it particular easy to understand levels of responsibility. (Swindon Borough Council, Chris Cooke)

This is very clear. The use of different colours is very effective and sections are well written and easy to understand. (Staffordshire Children's Trust, Michael Wood)

A good visual representation of the process and makes the reader go to the full document for exemplification. (Newcastle City Council, Linda Wafer)

The flowcharts are a useful illustrative guide to support the main text. They are clear and easy to follow. (Hartlepool Borough Council, Terry Maley)

Extremely. They should be printed out and laminated in all relevant work areas. (The British Computer Society, Liz Long)

The flowcharts allow for quick and easy reference to relevant sections. Where as greater detail for some of the flowcharts would have been useful it is understood that this guidance is meant to be a brief and useful document and increased detail would have made the guidance too long. (Swindon Borough Council, Chris Cooke)

The flowcharts are helpful up to a point. However they should be further annotated with additional FAQ (Education Otherwise , Fiona Nicholson)

These are very helpful as an aid to quickly explaining processes to a room full of practitioners. It would be very useful if these could be expanded to include a range of scenarios/ case studies. (Sheffield City Council, Ged Warren)

Suggest additional flowcharts: Looked After Children; Children born in prison; How to know information is accurate; Border cases and issues; When/how/why a practitioner would want to keep a record for longer than a year after involvement. (Leicester City Council, Andrew Bunyan)

More links could be added between text and flowcharts; especially in the electronic version of the guidance (e.g. hyperlinks). (Shropshire County Council, Liz Nicholson)

Flowcharts are helpful in explaining the processes; however it should be clear that they should not be used in isolation. (Shropshire ISA team, Liz Nicholson)

There was an overall consensus by the parents that they were not particularly concerned about the methods that professionals used to help make the system more accessible to them. Their key concern was what it would mean for them and their child - 'If the charts help them use it well, then that's ok' (ParentlinePlus, Jan Fry)

In general this section is clear and the flow charts clearly help to illustrate the process of providing access to information held on ContactPoint. (Family Policy Alliance, Claire Kober)

Flow charts are always useful in describing processes. Colour coding is helpful. (The Association of Directors of Children's Services, Richard Stiff)

We thought the colour coding particularly helpful (Home-Start UK, Sue Everitt)

Clarity that these processes need to be linked to local processes. (Wiltshire County Council, Janet Wilson)

Generally the flow charts are excellent. The number of charts may detract from their individual value. (Suffolk County Council CYPSP, Allan Cadzow)

Good, very useful (Poole Young Person 2, Jacqui Vye)

Extremely useful and the colour coding is helpful 4.64 there is scope for conflict between agencies. "To shield or not to Shield" A flow chart might be helpful. (Birmingham City Council, Roger Minchin)

The flowcharts are useful additions to the descriptions of the processes. (London Borough Of Brent, Anna Janes)

The flowcharts are useful and could be reproduced alongside the relevant sections as well as all together in an Annex. This would allow for different learning styles. The language in the flowchart box should be active rather than passive ie should be transactional. (Barnardo's, Pat Cummins)

I think I could make sense of the majority of the flowcharts (Poole Young Person 5, Jacqui Vye)

The Flowcharts could be used as part of training materials, user guidance or on posters or leaflets it would be useful to present some of these in a shorter user guide. (Kent County Council, Nikki Patient)

The flowcharts are generally helpful but we would suggest the following amendments are necessary. Flowchart B10: If a child does not have sufficient understanding to give or withhold consent to recording of their involvement with a sensitive service the professional should consider whether it is in the child's best interest to seek consent from a parent/carer. There may be cases where it would cause significant harm to the child if the parent/carer knew they had been in contact with a sensitive service. (Brook, Stephanie Whitehead)

All of these parents also thought that it would be useful to use flowcharts and colour-coding in the information for parents, carers and children (ParentlinePlus Parents Group 4, Sue Pedley)

Q7: Does the draft guidance cover all the necessary topics to support the appropriate use of ContactPoint?

There were **190** responses to this question.

Yes	51%
No	24%
Not Sure	26%

Significant responses from the main respondent groups are as follows:

	ISA / ContactPoint Team	Parent / Carer	Child/ Young Person	Local Authority - Other	Voluntary and Community sector	Children's Trusts / CYPSPs	Education - School & LA staff
Yes	59%	35%	65%	56%	20%	62%	54%
No	16%	30%	0%	28%	55%	31%	10%
Not Sure	24%	35%	35%	16%	25%	8%	36%

Key themes emerged, including:

There should be an equivalent guidance specifically for users covering what they must do to support their work but not about managing the system itself - this should not become a user guide but must exist alongside it.	17%
Redraft after implementation in order to check if the theory fits with the practice	16%
Case examples would help many topics contained within the guidance.	14%

Further comments included the need to emphasise the wider Every Child Matters context and how ContactPoint fits within that agenda, and that the guidance should be turned into separate documents - for users, for managers, for technicians, for national partners and for voluntary agencies (5%). These points have already been planned for in relation to aligning the guidance with best practice processes and training materials to support implementation.

Some **clarifications** were sought, including:

Consent	17%
The importance and frequency of reviewing consent	13%

Information sharing with colleagues who are not ContactPoint users	9%
How does the voluntary and community sector engage with ContactPoint?	9%
'Ordinary residence'	8%
How does ContactPoint relate to CAF/ e-CAF	7%
Running and using reports to manage data quality and users.	7%
How to manage children who access services across local authority borders	6%
Broaden the guidance definition of CAMHS	6%

Consent in relation to ContactPoint, whilst applicable to only two instances (retaining a child record past the 18th birthday, and including 'sensitive services' contact details), clearer references will be made to the Information Sharing: Practitioners' Guide, where consent is more thoroughly covered.

Respondents' Comments:

The principles of ContactPoint are good - but impossible to put into practice (Education related, Natasha Marchant)

Personally, I think the guidance is at the right level as it stands. We don't want ContactPoint guidance to become a user manual or list of procedures (ContactPoint Implementation Team (Bury LA), David Thompson)

This is a good manual which will be used as a working document for reference. It will also be a useful awareness raising introduction to training. (Newcastle City Council, Linda Wafer)

Need clearer guidance about mediated access Clearer guidance required for travellers, missing children and those at immigration detention centre as to when placed on ContactPoint and who does it. Administration of tokens – clearer guidance required Administration of CRB's – clearer guidance required (Bedfordshire County Council, Carol Harrison)

As mentioned previously in this response, the issue of consent needs to be developed in more detail and made clearer to understand. (Hartlepool Borough Council, Terry Maley)

It is essential that users do not think that they are only allowed to share the information contained on ContactPoint with others authorised ContactPoint users. The guidance does not make this clear. (East Riding of Yorkshire Council, Lee Butler-Johnson)

Should be seen as work in progress. Once implementation has been reviewed regarding the practical application of CP then the guidance should be subject to revision. At this stage everything is theoretical (Jacqueline Davies)

It does not make it clear whether a practitioner should contact other professionals as a matter of course to build up a fuller picture about the child, or whether contact should only be sought when there are specific concerns. The unique role of parents as the primary protectors of their children should be recognised and respected. (Family Education Trust, Norman Wells)

The guidance is very comprehensive and covers all the relevant data protection compliance issues. (Information Commissioner's Office, Lynne Shackley)

The criteria of children held on the ContactPoint database does not include those who are entering the country to reside (often not with parents) and are not classed as 'ordinarily resident'. (Tina Pickering)

There should be clear explanation about how ContactPoint fits with the other integrated processes within the Every Child Matters Change for Children Programme such as CAF, and information sharing; how it fits with ICS and the electronic social care record; how it fits with Connecting for Health and other key initiatives. (Hertfordshire County Council, Ann Domeney)

The Guidance is clear about the responsibilities of local authorities. However, the success of ContactPoint will be dependent upon how local authorities co-operation with health. (Leicester City Council, Andrew Bunyan)

Does this mean that asylum seekers, those without leave to remain or those visiting from other UK countries or abroad will not be logged if they do not access services? (Refuge, Nicola Sharp)

We are concerned that the guide's current definition of CAMHS does not adequately describe the full range of CAMHS Tier 2- 4 services. (No Limits (Southampton), Marina Murphy)

In broad terms yes – only the operation of the system will test this in detail. (The Association of Directors of Children's Services, Richard Stiff)

Mostly – see comments re parent support organisations. Some consideration and guidance re at what point or level of service/support such an organisation would indicate its contact with the child(ren) would be helpful (Home-Start UK, Sue Everitt)

I think its all covered well. (Poole Young Person 11, Jacqui Vye)

It would be helpful to include a section setting out partner's responsibilities in the effective use and supply of accurate data to ContactPoint. (City of Westminster, Nisha Munasinghe)

More detail about missing children eg/ children studying in UK but living abroad and children who emigrate but return before their eighteenth birthday. (London Borough Of Brent, Anna Janes)

Although the draft guidance is relatively comprehensive in terms of the local delivery of ContactPoint, it needs to be far more explicit on many of the principles of operation. (Children's Rights Alliance for England, Sam Dimmock)

Broadly the guidance covers all the issues we would wish to see, it is the emphasis on certain issues that needs adjusting - critical themes like shielding, accuracy disputes, we would like to see better referenced and highlighted throughout. (CAFCASS, Chelsey Bonehill)

All parents felt the contents were clear and appeared to cover the main topics of importance (ParentlinePlus Parents Group 9, Sue Pedley)

Q8: Is the draft guidance sufficiently clear about the statutory responsibilities of local authorities?

There were **184** responses to this question.

Yes	66%
No	15%
Not Sure	18%

Significant responses from the main respondent groups are as follows:

	ISA / ContactPoint Team	Parent / Carer	Child/ Young Person	Local Authority - Other	Voluntary and Community sector	Children's Trusts / CYPSPs	Education - School & LA staff
Yes	69%	43%	81%	75%	56%	62%	72%
No	13%	26%	7%	21%	19%	15%	10%
Not Sure	18%	30%	11%	4%	25%	23%	18%

Many of the **key responses** reinforced the statutory duties and responsibilities of local authorities:

Ensuring source systems' accuracy	20%
Promoting ContactPoint to CYP&F	14%
Managing partners' users	11%
Managing CRB currency	8%
Authenticating Users	5%
Governance	5%

However a significant number of respondents also made the point that **responsibilities** covered all organisations working with and using ContactPoint:

The guidance must clarify the responsibilities of local partners	21%
The guidance must clarify the responsibility of national partners.	19%
The guidance needs to distinguish statutory responsibility from general operational guidance	11%
There is limited local authority capacity to manage all aspects of ContactPoint	8%

There needs to be more detail for the ContactPoint management team	8%
Need to emphasise s.10 and s.11 duties which cover all readers	7%
The responsibilities of local authorities are clear but the power to oversee partners is limited	7%

A **further comment**, related to the ordinary residence issue, concerned how ContactPoint will manage records for refugees, asylum seekers and migrants who may not have a settled ordinary residence status and may also not be engaged with any local or national services (10%).

Respondents' Comments:

LAs have the responsibilities, but not much in the way of authority. Although Section 10 and 11 of the Children Act 2004 will help, there is no compulsion on any agency to share data with the Local Authority. In particular considering information from independent schools and health. (Leicester City Council, Lez Bullwer)

Clear about what to do, but not as how it can be done. (London Borough of Enfield, Andrew Fraser)

May benefit from a reference to the important role of partners in helping LA's fulfil their responsibilities. (Blackburn with Darwen Borough Council, Andrew Lowe)

Yes, given the nature of the requirement it is serving. The Audit Commission should be encouraged to include reference to it in their 2008 Key Lines of Enquiry (KLOE) for Data Quality. (The British Computer Society, Liz Long)

Responsibility for a child's ContactPoint record does not automatically confer responsibilities for providing services. (Royal Borough Kingston upon Thames, Duncan Clarke)

Although the document is useful as one document, it would be useful to also have a specific document which summarises all LA responsibilities. (Shropshire ISA team, Liz Nicholson)

Page22/23 (sensitive services) says if practitioners decide not to share info they must be 'willing to justify, if necessary the decision not to share...'. This needs amending to 'must be prepared to justify' (not just willing), as this does not promote responsibility. (Derby City Council, Lisa Melrose)

Who has responsibility for ensuring that the details of these children and young people have reached Contact Point. (NSPCC, Kevin Brookes)

The guidance appears to be prescriptive about the form that local arrangements for the operation of contact point should take. The expectation on local authorities set out in the draft is an unrealistic expectation without additional resourcing. (The Association of Directors of Children's Services, Richard Stiff)

Insufficient emphasis is given to the responsibilities of partners to cooperate with local authorities to ensure accuracy (Suffolk County Council CYPSP, Allan Cadzow)

The guidance should also make reference to the responsibilities of partners in making ContactPoint a success re: data quality and effective usage of the system as part of new integrated working processes. (City of Westminster, Nisha Munasinghe)

Some overarching statement or link to the ECM programme and workforce reform would make it clear that all practitioners are included and that partner agencies' policies and practice are involved. (Barnardo's, Pat Cummins)

The guidance appears clear. Further/amended guidance maybe required for other "bodies and persons" authorised to use contact point. (Connexions Cumbria Limited, Mark Bowman)

(78%) of the children who filled in the survey said yes, this was a good list. They did however think that there would always be a lot of work for Councils in dealing with constant changes of information, "overflow" of information at some times, and adding and deleting people from the database. (Dr Roger Morgan, OBE)

This guidance identified LA responsibilities, but reminded parents of the workload that ContactPoint would entail They wanted to know which part of the LA would be responsible, in that some parts (eg care) were thought to have more credibility than others (ParentlinePlus Parents Group 10, Sue Pedley)

It should highlight that the LA is the lead agency but similar responsibilities around accuracy of data need to be highlighted in the guidance for external agencies – all ContactPoint stakeholders in terms of accuracy of data, misuse, complaints and accountability. The reason being that external agencies own their data and staff and are responsible in the same way as the LA. The roles and responsibilities of the LA which will be ContactPoint team and the expectation of that team seem to go far beyond what is possible and consideration has not taken place about shielding records, monitoring audit trails, complaints management, SAR, FOI and the skills of the ContactPoint Manager. (London Borough Of Brent, Anna Janes)

Doesn't cover whose responsibility it will be to follow up a complaint when another authority is involved. (Birmingham City Council, Roger Minchin)

It is important that the team understands and takes full account of the operational management issues affecting schools. (NASUWT, Sonja Hall)

Responsibility for managing records associated to a child's old identity
Although the document is useful as one document, it would be useful to also have a specific document which summarises all LA responsibilities.
(Shropshire County Council, Liz Nicholson)

Q9: Is the draft guidance sufficiently clear about how ContactPoint will support practitioners working with children?

There were **191** responses to this question.

Yes	55%
No	20%
Not Sure	25%

Significant responses from the main respondent groups are as follows:

	ISA / ContactPoint Team	Parent / Carer	Child/ Young Person	Local Authority - Other	Voluntary and Community sector	Children's Trusts / CYPSPs	Education - School & LA staff
Yes	63%	40%	70%	65%	25%	58%	64%
No	25%	24%	7%	27%	31%	25%	0%
Not Sure	13%	36%	22%	8%	44%	17%	36%

Key themes proposed how the guidance may better support users, and included:

Need to add the benefits of using ContactPoint - benefits to users as well as children and families - it needs to be sold.	16%
Case examples would assist in getting the points across	14%
There needs to be materials specifically for users - user handbook, best practice guides, training materials, as well as this guidance	8%
There needs to be a stronger Every child matters link	15%
There needs to be more reference and understanding of what aspects ContactPoint training will cover.	6%

Comments relating to 'selling the benefits' fit within the promotion of ContactPoint by local authorities and the national team as part of the stakeholder engagement strategy (as does 'engaging children and families'). Improved cross referencing will be undertaken as part of the guidance revision following this consultation. Training and other targeted materials will be covered by the suite of relevant implementation materials as mentioned earlier.

A number of respondents sought **clarification** on the following:

'Practitioner involvement'	9%
The decision and process for retaining contact details on a record once a service has finished	8%
How lead professionals will interact with ContactPoint.	8%
How record transfers work	7%
What types of 'Court Order'	6%
Need to reference or explain information sharing with non-users (as opposed to data sharing with ContactPoint)	4%
The brokering process between users and 'sensitive services'	4%
How will ContactPoint manage missing children or support practitioners working with runaways?	4%

These comments have been noted and will form the basis of revision work on the guidance.

Respondents' Comments:

It launches straight in without pointing out the benefits and does not link enough to ECM outcomes. (Darlington Borough Council - Children's Services, Ann Lovegreen)

A recent article in 'The Guardian' (18 June, 2007) provoked criticism of the premise of ContactPoint. BCS believes this is misguided and perhaps made by people who are neither sufficiently experienced in the workings of the public sector from a local government perspective, nor aware of the challenges presented by joined-up partnership working. (The British Computer Society, Liz Long)

There is a lot of guidance on how to update and/or shield records but very little on the valid use of ContactPoint to support practitioners and improve outcomes for children. Some concrete examples / case studies would be useful. (Portsmouth City Council, Karen Fill)

ContactPoint may be intended to support practitioners working with children - I am not concerned about support for practitioners working with children, only about support for children when they need it. (Mary-Jo Buchler)

I would like the question raised as to what they class as a professional and how will information about ALL professionals (i.e. CMs, preschools) be added to the childs information, as whoever is able to access the childs "site" should know everybody that is involved in that childs welfare and not just the defined professionals. (Devon Childminding Association, Christina Wilkins)

If a CAF initiator is not a ContactPoint user how will they establish if a CAF has been done? It would be helpful if this scenario was included in the guidance. (North Somerset Council, Sally Milton)

Short and clear materials, which explain ContactPoint to children and young people, should be produced and made widely available. (Young person, Ofsted consultation group)

The guidance should include a list of key benefits for practitioners so they are clear how it will support them and so they are able to explain the benefits to children and young people, parents and carers. (Hertfordshire County Council, Ann Domeney)

It is not clear about how ContactPoint will work for sensitive services – it may be of limited value and cause concern about when/ if consent should be overridden regarding a sensitive service. (North Yorkshire Children and Young People's Strategic Partnership, Gemma Ingles)

To be honest, I don't really want to think about what would help them to do it , I'm more taken up with the daily struggles for me and my child' (ParentlinePlus, Jan Fry)

Need to be explicit that practitioners must use ContactPoint at first contact/key points - NOT just when they want to. (Derby City Council, Lisa Melrose)

3.33 It is not clear from the guidance whether it is permissible to disclose whether a CAF is already in process and the corresponding contact to a non-user. This is a significant point as if the ContactPoint team cannot alert the non-user to the existence of a current CAF, a duplicate CAF process may begin. (Nottingham City Children's Services, Di Smith)

We remain concerned that the draft guidance appears to rule out the inclusion of children who are not ordinarily resident in England. In our view this is a huge omission which undermines the whole purpose of the index. (Family Policy Alliance, Claire Kober)

"Would it stop me having to repeat my son's history every time he saw someone different? If it would then I'm for it" (ParentLinePlus, Jan Fry)

This will become clearer through its use and we would hope that there will be additional information and guidance issued as required. (Home-Start UK, Sue Everitt)

It has been a key concern of many practitioners that individual users might see placing details on ContactPoint as a substitute for action. ISC is pleased that the DCSF is trying to tackle this issue in this guidance. ISC would therefore suggest placing this statement in a more prominent position. (Independent Schools Council, Simon Whitbourn)

3.10 Does not say when a professional should search the database. Should this happen when the professional first comes in contact with a child; when he/she begins providing a service to a child; when he/she thinks the child may have additional needs that are not being met? (National Children's Bureau, Zoë Renton)

Will speed up the process, especially of authorities communicating with each other (ParentlinePlus Parents Group 2, Sue Pedley)

Parents felt they did not understand the 'wider package of reforms' and felt it would be helpful to see where ContactPoint fitted in (ParentlinePlus Parents Group 4, Sue Pedley)

Can help children who are regularly moved around All parents thought this guidance was clear and recognised it was useful to have all the information in one place (ParentlinePlus Parents Group 9, Sue Pedley)

It is somewhat worrying that the system will effectively have a veto over best practice in, for example, determining who can and can't be a lead professional. (e.g. where they are located in a sensitive service). (BASW, David Barnes)

Q10: Do you foresee any challenges arising from implementing ContactPoint using this guidance?

There were **202** responses to this question:

Yes	66%
No	10%
Not Sure	24%

Significant responses from the main respondent groups are as follows:

	ISA / ContactPoint Team	Parent / Carer	Child/ Young Person	Local Authority - Other	Voluntary and Community sector	Children's Trusts / CYPSPs	Education - School & LA staff
Yes	74%	53%	46%	81%	70%	73%	70%
No	13%	0%	38%	7%	0%	10%	0%
Not Sure	13%	47%	15%	12%	30%	18%	30%

Key themes and challenges emerging included:

Cultural/ Practice change	18%
Funding	18%
data quality	14%
Training burdens/ capacity	12%
Bureaucratic burden	10%
Human resources	10%
Enhanced-CRB issues	9%
Too many users	7%
large roll-out	6%
Maintaining security	6%
Managing non-LA users	6%
IT skills	4%
Agencies working 'Cross-Border', with Multiple LAs	4%
lack of IT equipment	4%

Clearly a majority of these themes exist beyond the scope and purpose of the guidance, but are necessary considerations for the successful implementation and use of ContactPoint, hence, we anticipate that the alignment of the

guidance with other key support materials will help manage some if not most of these issues.

Accordingly, a number of **suggestions** on how to mitigate these challenges were also proposed, and which fit our alignment proposals:

Include in training/ induction	17%
Partner engagement	16%
Raising user awareness	6%
Need SLAs	6%
Raising CYP&F awareness	6%
'Consent' consistency	3%
Need ongoing training	3%

A further key point made - and it's a recurring theme - is that “**ContactPoint is not a replacement for action**” (6%)

Further **challenges** included managing vulnerable and highly mobile children (10%), information sharing inconsistencies between agencies (3%) and losing contact when young people make the transition to adult services (1%).

Respondents' Comments:

Main challenges around; raising awareness / practical issues around implementing User Management functions in partner organisations and general issues around achieving good data quality. (Lyndsay Smith)

BCS is of the opinion that the implementation of ContactPoint needs to be surrounded by a very positive marketing message and supported by robust audit reviews to ensure that everyone is playing their part in ensuring both the ongoing safety and security of the information contained therein, (The British Computer Society, Liz Long)

Managing users for partners over whom the local ContactPoint Management Team has no real means of control presents challenges with respect to user authentication and administration procedures. (Portsmouth City Council, Karen Fill)

3.21 A lot of LA's may not wish for user to create new records directly onto ContactPoint. This could cause significant data control issues. Can this facility be blocked within user log on rights? Such a user facility will not go down well with local CMS data managers and will be seen as a risk. (Milton Keynes Council, Richard Sanderson)

Guidance provides a really good basis for ContactPoint implementation. This is a positive challenge and an opportunity to create positive and needed change in a number of areas. (Barking and Dagenham Children's Services, Jan McColm)

Sheffield's concern is that these are all manual processes which will demand high levels of resources on an ongoing basis. We feel that LAs should be assisted to find automated methods for carrying out many of these tasks with manual intervention only where necessary. (Sheffield City Council, Ged Warren)

The database may not include many children who are highly vulnerable because they do not appear to be ordinarily resident in England. These may include the victims of child trafficking, and unaccompanied asylum seeking children. (Family and Parenting Institute, Claire Jordan)

It is always difficult to assess new guidance and the test will be once this is being used whether it is fit for purpose. It is also challenging writing guidance for an emerging system which will change as it develops - however the current guidance does look very thorough and substantial. (Reading Borough Council, samantha jones)

Mainly in relation to how practitioners interpret the guidance. We feel the guidance is clear but our experience is that new ways of practice can present challenges (Anonymous)

Challenge: services spending time managing data rather than helping children. (J Brewer)

The level of security and disciplinary procedures relating to misuse of ContactPoint may make practitioners fearful of using it effectively. (Leicester City Council, Andrew Bunyan)

The processes supporting information sharing have the potential to increase the workload of teachers and headteachers. (NASUWT, Sonja Hall)

A good understanding of the guidance is essential for all relevant parties if we are to maximise the effectiveness and accuracy of the system. This document emphasises the importance of the system and the culture changes required. (Wigan CYPS, Director Of Children and Young People's Services)

Difficulties which arise are likely to be results of the legislation, not the guidance. (Suffolk County Council CYPSP, Allan Cadzow)

If users are overwhelmed with too many new 'rules' about how they must use ContactPoint there is a risk of adverse perceptions which will inevitably affect take-up. (Brighton and Hove City Council, Caroline Butler)

ISC recommends that retraining should occur every 3-5 years and that users be required to complete further training updates online and records of training

materials be supplied via the online Help/Guidance section accompanying the ContactPoint database system itself. ISC also advises the Department that the training itself should be properly accredited (Independent Schools Council, Simon Whitbourn)

The difficulties will be ensuring internally that our process and systems for ensuring accuracy of data, and security systems, complaints for children and adults are all compatible with ContactPoint in order to ensure that ContactPoint is a seamless aspect of single agencies CMS. (CAFCASS, Chelsey Bonehill)

Its very difficult to foresee practical challenges arising from implementing ContactPoint using this guidance. the guidance itself is thorough. (The Haven Wolverhampton, Popinder Kaur)

The challenges of adequate training, and of providing appropriate information to families and children about the database, are immense. It needs to be understood that many local authorities are already struggling with the implementation and use of other electronic systems such as the ICS, and that, despite attempts to address the issue, understanding of the effect of the Data Protection Act is often imperfect. (BAAF, Deborah Cullen)

Q11: Is the use of colour-coded, user-specific, guidance helpful for readers?

There were **173** responses to this question:

Yes	83%
No	5%
Not Sure	12%

Significant responses from the main respondent groups are as follows:

	ISA / ContactPoint Team	Parent / Carer	Child/ Young Person	Local Authority - Other	Voluntary and Community sector	Children's Trusts / CYPSPs	Education - School & LA staff
Yes	90%	81%	83%	88%	77%	92%	80%
No	0%	5%	4%	4%	8%	0%	10%
Not Sure	10%	14%	13%	8%	15%	8%	10%

Key themes to emerge included:

The colours and flowcharts are very helpful	29%
Colours are useful but care is needed as many organisations will not have colour printers	20%
B+W or greyscale tonal separation may be better for printing and for colour-impaired users	18%

A **further comment** was that an additional box in the main text and flowcharts was suggested to identify activities specifically for local/national partners. We propose to reference National Partners more thoroughly throughout the guidance as the role of the National Partners was being defined through the Regulations whilst the guidance was being developed for consultation.

Respondents' Comments:

It's good to see how the actions of one impact on another and the colour coding allows all to home in on guidance that is related to them. (ContactPoint Implementation Team (Bury LA), David Thompson)

Definitely (Newcastle City Council, Linda Wafer)

The idea of different colours on the screen will help people a lot. (Triangle (CYP consultation), Ariel Katz)

Colour coding is very useful. (Connexions Cornwall and Devon, Jenny Rudge)

Yes – this is useful and a good technique to help develop a better understanding of how the implementation of ContactPoint will impact on different stakeholders. This approach is favourable to techniques used in previous DfES consultation documents. (Hartlepool Borough Council, Terry Maley)

Yes, this is extremely useful. (The British Computer Society, Liz Long)

The colour coding for different types of user makes it particular easy to understand levels of responsibility. (Swindon Borough Council, Chris Cooke)

The colour coding is especially helpful - this is one of the strengths of the document. If is presented in Word format it will enable ContactPoint managers and trainers to cut and paste relevant sections as appropriate. (Sue Binns)

The guidance document itself was simple in terms of reading and clarity by being written in plain English, the layout and colour coding was an additional benefit when navigating around the sections. Reference to other related material was also helpful. (Tina Pickering)

This is a very useful and makes the document easier to read. (LISA (Lewisham Information Sharing and Assessment), Vanessa Inniss)

The draft guidance is comprehensive and detailed. Whilst this is important, the NASUWT recommends that the final guidance is supported by material which is targeted at particular groups of people and which specifies information that relates to them. (NASUWT, Sonja Hall)

I like the use of the colour coded boxes because it makes it easier to identify what sections of text apply to who and easy just to skip to these sections without having to read through parts that wouldn't necessarily apply to you (Shropshire County Council Children's Participation Team, Natalie Roberts)

We thought the colour coding particularly helpful (Home-Start UK, Sue Everitt)

It is useful to be able to see the different levels of responsibility contained in one document. However, consideration should be given to making available summary documents based on the existing boxes for: ContactPoint User; Staff Manager; and ContactPoint Management Team (London Borough of Croydon, Tony Bristow)

The colour coding is an excellent device to distinguish different points of focus. It should be ensured that the differentiation is sustained even if the material is printed in b&w. (Barnardo's, Pat Cummins)

I was involved in this database (consultation) a few years ago in the early stages and I am glad that it has been implemented and I can see that our views have been taken into account. (Poole Young Person 5, Jacqui Vye)

Q12: General Comments.

There were **100** responses to this question.

Initial views on the style language of the guidance were generally **positive**:

Clear, comprehensive, jargon-free	22%
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A number of comments related to the **content**, **scope** and **format** of the guidance:

This needs to be issued alongside a good practice guide	22%
A summary guide would help for practitioners to take with them on visits	15%
cross reference with ECM guidance	14%
A child and parent-friendly version would help engage families	13%
Need more bullet points	9%
Replace 'Child' with 'Young Person' where appropriate	7%
Need guidance for Private, Voluntary and Independent Sector	7%

A number of opponents chose this question to voice their **opposition** to the principles behind ContactPoint and not necessarily the guidance itself. These included:

'big brother'/intrusive database	12%
Spend money on more workers	7%
Waste of money	6%
Cover only 'at risk' children	3%
Poor track record of large IT databases	5%

Respondents' Comments:

Overall the guidance is very clear, there will still probably be a need for some awareness raising around this guidance at local level too. (Lyndsay Smith)

In general thought the document was clearly presented. (Anonymous)

These proposals have no place in a society that purports to support civil liberties, families and the rights of parents and children. (Karen Rodgers)

The potential risks from inaccuracy and misuse are monstrous and will remain no matter how clear the guidance. (Mary-Jo Buchler)

we need to ensure this is a living document. It is being published 12 months in advance of the system going live - there are bound to be changes. (Liverpool City Council, Mike Grek)

We look forward to continuing to work with DFES/DCSF on the practical implementation of ContactPoint. (Information Commissioner's Office, Lynne Shackley)

Our overriding concern in relation to ContactPoint is that considerable staff time and resources will go into keeping information up-to-date on those children who will never need specialist services. (Family and Parenting Institute, Claire Jordan)

Guidance is very helpful and is easy to follow. The flow charts are very helpful and I would suggest that once ContactPoint is in Place that these be expanded further as they are easy for professionals to follow. (Reading Borough Council, samantha jones)

It is essential that all VCI sector groups and organisations who could/should use this system are enabled to do so and not excluded from the process at any stage on the grounds of lack of resources, knowledge or insufficient support and guidance. (VCI GRID Reference Group, Matt Ford)

Colleagues working in some of our most sensitive services welcome the understanding of the sensitivity around sexual health, mental health, and in drugs and alcohol and the requirement for informed consent for our service contribution to the resource. They will review and amend their consent and confidentiality procedures before implementation. (Hertfordshire County Council, Ann Domeney)

ContactPoint will go a long way in improving communications across health and social care professionals and hopefully contribute to improved provision of care and services. It is important for all those who work with children and families to take ownership of the guidance not just local authorities. (Royal College of Midwives, Louise Silverton)

Children and young people in care - although the guidance refers to carers as well as parents we suggest that the position of children who are in the care of the local authority is specifically addressed. (The National Youth Agency, Sarah Hargreaves)

'Sounds like it could be a good idea'. If ContactPoint could make sure we got that kind of information and services it would be great'. (ParentlinePlus, Jan Fry)

Refuge acknowledges and welcomes the Government's commitment to safeguard and support all children through better integration and information

sharing across services. The creation of a system which reduces the time taken to identify and locate children as well as the professionals with whom they are in contact, is positive. (Refuge, Nicola Sharp)

Seeking consent to become the nominated lead professional' may not quite reflect the actual process of becoming a lead professional eg 'A lead professional is identified from among the group of practitioners working with the child, young person or family. They are chosen through a process of discussion and agreement between those practitioners who are involved. It may be more appropriate to identify the sensitive service issue as a significant item for consideration in regard of this decision. (Nottingham City Children's Services, Di Smith)

This document emphasises the importance of the system and the culture changes required. (Wigan CYPS, Director Of Children and Young People's Services)

We welcome this consultation exercise and are pleased to contribute to the process. (Greater London Domestic Violence Project, Jo Sharpen)

We welcome the guidance and we felt that practitioners have had constructive input into the drafting of the guidance. (Birmingham City Council, Roger Minchin)

I think that the guidance is very well presented but I think at times the language is a bit too complicated. (Poole Young Person 6, Jacqui Vye)

We are concerned that ContactPoint will inevitably fall short on each of the key principles that lie at the heart of the project: viz. simplicity, security, and accuracy. (Family Education Trust, Norman Wells)

We welcome the opportunity to comment on this consultation on the draft guidance for ContactPoint. The draft guidance is generally clear and well put together. The structure of the guidance is helpful as it demonstrates the links and responsibilities where ever you sit in the agency or structure. The guidance at 3.66 about Serious Case Review is an extremely helpful use of data. (CAFCASS, Chelsey Bonehill)

We welcome the guidance to ContactPoint managers that their role is to act as broker and not to make decisions about whether contact between sensitive services and ContactPoint users is appropriate. (Brook, Stephanie Whitehead)

Somehow there has to be some way of conveying a sense that this is all about improving the quality of lives for people who use services. (BASW, David Barnes)

"well done for making this up" - "u can't put too much trust in a machine ... just my opinion but you know better than I do, good luck" (Children's responses - Dr Roger Morgan, OBE, OFSTED)

Language used is accessible for professionals but will need to be amended so that it is more appropriate for children, young people and some parents/carers who only need to know their rights and entitlement. Format generally is fine, colour coding good though document overall is lengthy. (Newcastle City Council, Linda Wafer)

It needs to state that for those working with children and families it does not invent a completely new set of procedures. It needs to emphasise that ContactPoint is a tool which will enhance their work. (Hampshire County Council, Simon Cull)

Adoption not clearly mentioned within guidance especially with regard to confidentiality of record (Bedfordshire County Council, Carol Harrison)

Overall, the guidance is useful and clear. The glossary is very useful in defining key terminology. As a general point, there seems little evidence of the wider ECM agenda. It is mentioned in the introductory session but needs to be more prominent throughout the document as a whole. (Hartlepool Borough Council, Terry Maley)

The content of this document and the style it has been written in means it will be an invaluable tool for the ContactPoint Management team. (Milton Keynes Council, Richard Sanderson)

Although ContactPoint is part of the wider ECM change for children programme. Clearer links should be made with CAF, Lead Professional, safeguarding and information sharing guidance. (Kent County Council, Nikki Patient)

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