



School and Public Health Nurses Association
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Institute of Health Visiting
Royal Society for Public Health
John Snow House
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Sent by email

Dear Michael,

We are writing to you regarding the open consultation on the proposed changes to Hampshire County Council's Public Health Services. As the national professional bodies representing school nursing and health visiting, we urge you to review the impact that the proposed changes will have on babies, children and their families. In particular, it has been brought to our attention that, if implemented, the proposed model may be in breach of statutory safeguarding responsibilities which warrant a more detailed review to determine whether or not this is the case.

Full details are in the consultation document contained in the link below – in brief:

Hampshire County Council currently has an open consultation on their proposed cuts to the 0-19 public health service. This consultation is an important national test case as the plans represent a significant shift from the current national Healthy Child Programme.

Like most local authorities in England, since 2015 the council has sought to reduce costs to keep in step with the reducing public health grant. To address the current shortfall, the council is faced with difficult decisions as it needs to save an additional £6.8 million, from a total budget of £52.9 million in 2021/2022, to help the County Council to 'balance its budget'.

The proposed changes will have a significant impact on the delivery of the Healthy Child Programme, and a number of other key national policies, with plans to reduce the 0-19 Public Health Nursing Service budget by £2.09 million per year by:

- reducing the number of staff posts (e.g. health visitors, school nurses and community staff nurses) available to support families by approximately 47 (12.5% of the current workforce);

- only providing school nurse support to children and young people over the age of 11 years through the 'digital offer', i. e NO face to face service.

For children 0-5, all children will only receive one mandated face-to-face health review. All other reviews will be, *"risk assessed to decide whether they should be completed face-to-face, by video or by telephone"*.

These plans strip out the mechanism to identify vulnerable children (in all 3 categories of vulnerability defined by this Government). How will services know who is vulnerable if they are not seeing families? Assessments will not be reliable as: vulnerability is not identified in a 'snapshot' assessment, no valid 'virtual' assessment tool exists (all current tools are designed to be used alongside health visitor clinical judgement – they are not screening tools), needs change over time, some families will be excluded due to digital poverty and vulnerable babies have no voice to independently ask for help if parents/ carers do not recognise their needs.

Without the universal safety net that health visiting provides, vulnerable babies and young children will be missed, or identified too late.

Page 20 School nursing: Children aged 12 and over, states the school nursing service will **no longer deliver:**

- Safeguarding support including assessment of needs, the identification of unmet health needs, or independent advocacy
- Health representation at child protection conferences including contributing to decision making within child protection plans.

Safeguarding of babies, children and families is always of paramountcy. However, post-Covid, it is even more so with rising levels of children living with vulnerability and risk. England already has a significant problem, with 1/3 of all vulnerable children recognised as 'invisible' within the system and therefore not receiving the support that they need. This proposed model would place them at even greater risk.

In terms of inspectorate requirements, the CQC would be unable to apply their current inspectorate methodology as key lines of enquiry (KLOE's) will not be met. Assurances would be impossible to provide as many children would not have been physically seen, apart from the 1 face-to-face contact by the Health Visitor and 2 mandated contacts by the School Nursing service in reception and year 6, purely for the National Childhood Measurement Programme purposes.

We are concerned that if this plan is passed by the Council, it sets a precedent for similar delivery models across the country. Whilst we, of course, recognise the benefits of 'local flex' to tailor support to local needs, this proposal challenges the acceptable limits of such flexibility and will pose significant risks to our most vulnerable children.


It is important that this Hampshire test case is not viewed as a local issue, rather that it represents the predicted consequences of years of cuts to the public health grant and

inadequate system levers to prevent this happening elsewhere. We would urge you and your officials to review the current system levers with regard to the following important questions:

- What failsafe mechanisms are in place to ensure that all children receive the full offer set out in the Healthy Child Programme, provided universally and with a level of intensity proportionate to need, and with the level of quality needed to reduce inequalities and improve outcomes, regardless of where they live?
- What failsafe mechanisms are in place to ensure that all children are protected in accordance with current statutory responsibilities?
- What are the impacts of these proposed changes on the capability of the Government to deliver their other national priorities for children, families, health, education, social care and most importantly to 'level up' society?

We would welcome the opportunity to meet with you to discuss these concerns and would also be glad to assist in any way possible.

With best wishes,

Two handwritten signatures in blue ink. The first signature is 'Sharon White' and the second is 'Alison Morton'.

Sharon White OBE CEO, School and Public Health Nurses Association

Alison Morton, Executive Director, Institute of Health Visiting

cc. Professor Viv Bennett CBE, Chief Nurse and Director Maternity and Early Years

The consultation documents are available here:

<https://www.hants.gov.uk/aboutthecouncil/haveyoursay/consultations/public-health-consultation>