

**ContactPoint: Consultation on Draft Guidance**  
**Family and Parenting Institute response**  
**26 July 2007**

**1. Accuracy**

Is the draft guidance sufficiently clear about the importance of accuracy?

Yes  No  Not sure

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.

**2. Unauthorised Access and Misuse**

Is the draft guidance sufficiently clear about how unauthorised access to ContactPoint and misuse will be managed?

Yes  No  Not sure

Security is particularly important considering the large numbers of users (estimated at 330,000). It is not clear from the guidance how proactive the person carrying out this monitoring would have to be in identifying possible misuse. We understand that there would be some form of 'flag' automatically created on the audit trail if suspicious usage takes place, but this is not explained in the guidance.

In paragraph 4.24 it states that the monitoring of the audit trail may take place at weekly intervals. It would be more reassuring if, instead of a flag being created on the audit trail, an email was triggered to the person responsible for monitoring. This would enable immediate investigation if necessary.

Consideration should be given to setting up a proactive security system such that certain types of use would be blocked, requiring specific authorisation to override. The type of activity deemed inappropriate would have to be tailored to the workplace or even the individual user, to allow for the different levels of flexibility required by, for example, social workers and Connexions staff.

Paragraph 2.3 states that users *must not* access ContactPoint through public computers, such as internet cafes. Lord Adonis has stated<sup>1</sup> that users *will not be able to* access the system except from authorised computers. We would welcome clarity on this point.

### 3. Subject Access Requests

Is the draft guidance sufficiently clear about an individual's rights to see information held about them?

Yes  No  Not sure

The section on Subject Access Requests is relatively clear, however there is potential for confusion about when parents and children can see information without going through the formal process and providing evidence of identity and address. Section 3.55 briefly refers to the possibility that parents or children, as appropriate, could check information on the screen, for example at a GP's surgery. While this is the simplest way of keeping the data accurate, there are clearly circumstances in which it would not be appropriate, for example where a non-resident parent has a court order against them.

We believe it is important that parents and/or children should be able to directly check records for accuracy, but this needs to be made explicit in the guidance or practitioners may not feel confident doing this. The guidance should also include recognition of when this informal approach may not be appropriate.

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. At an appropriate point after ContactPoint has become operational, there should be a review of public awareness. This should also include the extent to which children and their families have been able to check their records, and whether they encountered any difficulty in doing this.

### 4. Complaints Procedure

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

Yes  No  Not sure

In regard to paragraph 4.19, which lists the types of complaint which local authorities are not responsible for, this would be clearer if it indicated which body would be responsible for each type of complaint.

### 5. Shielding

Is the draft guidance sufficiently clear about how the 'shielding' of child records will operate?

Yes  No  Not sure

### 6. Flowcharts

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<sup>1</sup> <http://www.publications.parliament.uk/pa/ld200607/ldhansrd/text/70718-0013.htm>

Are the flowcharts helpful in explaining processes within this guidance?

Yes  No  Not sure

### 7. Contents and Purpose

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

Yes  No  Not sure

There should be more information in the guidance about parents and children giving consent to the inclusion of sensitive services on the database and how this relates to the child's age. For example a parent could have given consent for information to be included for a child which the child themselves might wish to remove when they were older. It is not clear (3.7) when renewal of consent might be asked for.

### 8. Local Authority responsibilities

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

Yes  No  Not sure

### 9. Supporting Practitioners

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

Yes  No  Not sure

### 10. Implementation

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

Yes  No  Not sure

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.

### 11. User Groups

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

Yes  No  Not sure

### 12. General Comments

We are keen to know your views and welcome any further general comments that you might have on this draft guidance; this can include the format, content and language used.

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. Meanwhile, the database will not address the more fundamental problems in child welfare and child protection.

We are also uncertain about the accuracy of some of the figures that have been provided: the figure of £88m per year (or almost £600,000 per local authority) expected to be saved by finding information more quickly seems very high, while the estimated annual running costs of £41m may be an underestimate. With the best of intentions, Government IT projects have a history of cost overruns.

We recognise that there has been consultation with children, young people and parents. However, this has related to implementation, not the principle of having such a database. While the details of specific services classified as 'sensitive' will be hidden, involvement with social workers or the youth offending team will be considered sensitive by many children and parents. The fact that the child's school or Connexions worker will automatically be able to access this information may well be of concern to them.