

Title of Report:	Implementing the Recommendations of the Munro Review of Child Protection - A Child Centred System
Report to be considered by:	Executive
Date of Meeting:	9 th February 2012
Forward Plan Ref:	EX2393

Purpose of Report:

To inform the Executive of the key recommendations of the Munro report and propose how they should be implemented in West Berkshire.

Recommended Action:

1. The Executive are asked to note the key elements of the Munro Review.
2. Executive are requested to endorse the proposed approach to implement the required changes set out in this report.
3. Agree the setting up of a governance body to oversee the implementation of Munro in West Berks.
4. Agree start to review the West Berks children's social worker and management career structure with a view to completing in time to comply with the requirement to set up the Principal Social Worker role by April 2012 (Munro Recommendation 14)
5. To commit to a three year change programme to develop West Berks Children's Services in accordance with the aspirations of Munro.

Reason for decision to be taken: See above

Other options considered: N/A

Key background documentation: 3 Munro Reports and other background documentation (<http://www.education.gov.uk/munroreview/>)
Improvement and Development Agency Safeguarding Scrutiny Guide (<http://www.idea.gov.uk/idk/aio/15327408>).

The proposals contained in this report will help to achieve the following Council Plan Priorities:

- ☒ **CPP1 – Support our communities through the economic downturn** – to alleviate the impact on different communities and individuals who find themselves out of work

- and/or disadvantaged
- ☒ **CPP2 – Raise levels of educational achievement** – improving school performance levels

The proposals will also help achieve the following Council Plan Themes:

- ☒ **CPT7 - Safer and Stronger Communities**
- ☒ **CPT8 - A Healthier Life**
- ☒ **CPT9 - Successful Schools and Learning**
- ☒ **CPT10 - Promoting Independence**
- ☒ **CPT11 - Protecting Vulnerable People**
- ☒ **CPT12 - Including Everyone**
- ☒ **CPT13 - Value for Money**
- ☒ **CPT14 - Effective People**
- ☒ **CPT15 - Putting Customers First**
- ☒ **CPT16 - Excellent Performance Management**

The proposals contained in this report will help to achieve the above Council Plan Priorities and Themes by:

The changes outlined in this report are designed to support three of the Council's purposes, specifically:

- i) Helping you to help yourself
- ii) Helping you when you cannot help yourself
- iii) Providing and acting in the interests of communities, people and employers in the district

Portfolio Member Details	
Name & Telephone No.:	Councillor Irene Neill - Tel (0118) 971 2671
E-mail Address:	ineill@westberks.gov.uk
Date Portfolio Member agreed report:	9 th November 2011
Contact Officer Details	
Name:	Mark Evans
Job Title:	Head of Children's Services
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Implications

Policy:	This report highlights the intention to change our approach to the delivery of Children's Services. Over time this will result in considerable changes to policy, procedure and practices.
Financial:	None, the changes will be delivered within the available budget.
Personnel:	As the project develops there will be some implications for Children's Services personnel, initially the creation of the Principal Social Worker role and later a review of the children's social work and management career structure.
Legal/Procurement:	None

Property: None

Risk Management: The report sets out a planned process for changing the way we view risk in Children's Services. The Munro report highlights the need to balance the investment in risk assessment against the potential benefits and improvements in outcomes for children and their families. Munro advocates developing what is referred to as a 'risk sensible' approach which balances risk management against other considerations to reach a pragmatic and child centred approach to the delivery of Children's Services.

Equalities Impact Assessment: EIA Stage 1 Completed

Is this item subject to call-in?	Yes: <input checked="checked" type="checkbox"/>	No: <input type="checkbox"/>
If not subject to call-in please put a cross in the appropriate box:		
The item is due to be referred to Council for final approval		<input type="checkbox"/>
Delays in implementation could have serious financial implications for the Council		<input type="checkbox"/>
Delays in implementation could compromise the Council's position		<input type="checkbox"/>
Considered or reviewed by Overview and Scrutiny Management Commission or associated Task Groups within preceding six months		<input type="checkbox"/>
Item is Urgent Key Decision		<input type="checkbox"/>

Executive Summary

1. Introduction

- 1.1 The Munro Report published in June 2011 sets out important changes to the way services will be provided to protect and support children. The report makes 15 recommendations which have been largely accepted by central government and will shape the development of Children's Services. The key recommendations relate to reducing prescription and bureaucracy, improving leadership, working with others to provide early intervention/help for families and developing the children's social care workforce. The changes represent a potential sea change for Children's Services and their implementation will require significant culture change for all involved.
- 1.2 This paper sets out to achieve five objectives. Firstly, it provides a summary of key elements of Munro's report and secondly it considers the government's response to it. The third part presents an initial assessment of where West Berks is now in relation to the recommendations. The fourth element describes the proposed process for making the changes in the local context (and some potential key themes), whilst the fifth and final part addresses how we should consult and involve key stakeholders in this change process.

2. Proposals

- 2.1 The Executive are asked to note the key elements of the Munro Review.
- 2.2 Executive are requested to endorse the proposed approach to implement the required changes set out in this report.
- 2.3 Agree the setting up of governance body to oversee the implementation of Munro in West Berks.
- 2.4 Agree to start to review the West Berks children's social worker and management career structure with a view to completing in time to comply with the requirement to set up the Principal Social Worker role by April 2012 (Munro Recommendation 14)
- 2.5 To commit to a three year change programme to develop West Berks Children's Services in accordance with the aspirations of Munro.

3. Conclusion

- 3.1 This report sets out the first steps for implementing Munro in West Berks. To be successful it will require the commitment and participation of elected members, staff and our partner agencies. The changes needed will take a period of years to implement as they involve a fundamental shift in the way we work with children and their families. Consequently this paper represents the beginning of this process by describing how we can start this process.
- 3.2 The required changes will impact on key areas of work including the way we manage risk and allocate resources to support children and their families. It is important that we progress this work in a timely way to comply with the requirements of the Munro review and reflect changes at a national level that will monitor our process e.g. planned changes to the way Ofsted inspect Children's

Services. To maintain our position as a well-performing authority it is important that we start this work immediately.

Executive Report

1. Introduction

- 1.1 The purpose of this report is to describe the background and development of the Munro review and set out a proposed framework for the local implementation of the recommendations made in the final report.

In June 2010 the Government commissioned Professor Eileen Munro, Professor of Social Policy at the London School of Economics to lead an independent review aimed at improving child protection services. Munro produced three separate reports; the first two were concerned with analysing existing problems and shortcomings and in setting out the characteristics of an effective child protection system, whilst the final report sets out 15 recommendations aimed at improving practice. Professor Munro, in making her recommendations, has advised the government against 'cherry picking'. She suggests they should be accepted or rejected in their entirety.

The Government produced a response in July 2011, broadly agreeing with almost all of the recommendations and suggesting a programme of work to implement them. It advocates "a shift in mindset and relationship between central government, local agencies and front line professionals working in partnership".

Munro represents a potential sea change for Child Protection and related services, suggesting that many of the reforms implemented over previous decades were though well motivated, fundamentally flawed. She proposes a radical new approach designed to empower children, their families and the practitioners who work with them. She also acknowledges that this does not represent a 'quick fix' as she suggests that wholesale culture change is required at all levels of the system from central government to frontline staff.

- 1.2 This paper represents the start of a process to implement the Munro recommendations in West Berks. It is a complex and challenging undertaking that will take several years to complete. Consequently the purpose of this report is to describe a process for achieving this and engaging the key stake holders in this complex task, rather than presenting a finalised project plan for the work which can only be developed with their involvement and participation.

The Report is structured in four key sections:

Title	Key Purpose
Background in Relation to the Munro Report	Provides a commentary on the history of the report and the key themes it covers.
Status of the Munro Recommendations	Summarises the Government's response to the Munro recommendations.
Commentary on Munro in the West Berkshire Context	Initial analysis of what Munro means for West Berks.
Proposal for Implementing Munro Recommendations in West Berkshire	Sets the potential vision, design, governance structure, implementation approach and key themes for the Munro change process

2. Background in Relation to the Munro Report

- 2.1 Many of the themes running through the Munro report chime with some of the key strands of government policy which are being developed in the areas of Localism, Education and Early Intervention.
- (a) Local practice and reducing prescription – the review finds that local professional autonomy and creativity is too often stifled by excessive bureaucracy and centrally driven prescription. There are too many procedures, and too many performance indicators, some of which have even proved counter productive as they have measured processes rather than looking at what actually helps children. A reduction in the amount of procedures, centrally produced guidance, and performance indicators is recommended.
 - (b) Local leadership – for the Government to be confident that local authorities are in a fit state to manage child protection arrangements, it is important that there is strong local leadership. The report endorses some of the structures that had previously been set up to run children’s services. The post of Director of Children’s Services should remain, and Children’s Safeguarding Boards should continue.
 - (c) Local partnerships – partnership working remains a vital element within child protection. As well as the Children’s Safeguarding Board, there needs to be strong governance links between the DCS and local policing and health structures.
 - (d) Reducing the burden of inspection – as part of the intention to reduce bureaucracy, the report recommends changes to the existing inspection framework. Large scale inspections where the LA is notified beforehand have tended to be very resource intensive and of questionable effectiveness. It is recommended that extending the programme of unannounced inspections is a more accurate and less resource intensive way of inspecting the quality of front line practice.
 - (e) Joint responsibility for “early help” – the report endorses the views of the Allen, Field and Tickell reports, that early intervention services are a vital and cost effective part of Children’s Services. The inspection regime will test this, but also recognises that the responsibility for early intervention services rests as much with health and early years settings as it does with the Local Authority.
 - (f) Serious Case Reviews – the report is sharply critical of the existing system of reviewing cases where a child dies or is seriously injured through abuse or neglect. Serious Case Reviews (SCR’s) are criticised as being too expensive, too preoccupied with individual blame, and ultimately ineffective in the primary purpose of enabling lessons to be learned. Alternative models are suggested and the report recommends ending the Ofsted grading of SCR’s.
 - (g) Developing the Social Work profession – the reduction in centrally prescribed procedures and performance indicators carries with it significant risks unless it is matched with improvements in the skills and effectiveness of the social workers on the front line. The report endorses the work of the Social Work Reform Board in improving the profession and recommends strengthening the voice of the profession within government by appointing a Chief Social Work officer. Locally, the report stresses the importance of senior managers communicating effectively with front line staff.

3. Status of the Munro Recommendations

- 3.1 The government's response to the Munro report is entitled "A child centred system" and was published in July 2011. It endorses the conclusions of the report, signs up to the vast majority of the recommendations, and suggests an ambitious programme of work to reform the child protection system. The response picks up on the major themes as above:
- (a) Local practice and reducing prescription – The Government agrees there is too much statutory guidance and will work to reduce this and strengthen emphasis on the exercise of professional judgement. Performance indicators will be revised to focus more on outcomes. Munro Review Page 4 of 6 (Paper No. 11-664)
 - (b) Local leadership – The government endorses the value of the role of the Director of Children's Services and Lead Member in relation to children, and has updated the statutory guidance in relation to both roles. However, the Government accepts that ultimately "final structures are a matter for local determination". Leaders of children's services must also work closely with other local leaders – e.g. police and PCT clusters.
 - (c) Local partnerships – The Government agrees with proposals to strengthen the role of local Safeguarding Children Boards and will look to develop their role in overseeing early intervention arrangements.
 - (d) Reducing the burden of inspection – The Government agrees with the intention to reduce the burden of inspection. Ofsted are currently consulting on ending the practice of announced inspections in favour of more unannounced inspections. The content of the inspections is also likely to change with a greater emphasis on the observation of practice.
 - (e) Joint responsibility for "early help" – The Government's response endorses the views of the Munro report, that early help should be a joint responsibility. The new inspection framework is likely to reflect this.
 - (f) Serious Case Reviews – The Government is undecided on this issue and proposes a further period of consideration. It is accepted that Ofsted evaluations of SCRs should end, but not until there is a credible alternative to the system.
 - (g) Developing the Social Work profession – The Government accepts the proposals to develop the social work profession. As part of this it will appoint a Chief Social Worker to represent the profession within Government. Local authorities will be strongly encouraged to appoint a Principal Child and Families Social Worker to strengthen the link between the senior managers and front line practitioners.

4. Commentary on Munro in the West Berkshire Context

- (a) **Local practice and reducing prescription** – The recommendations in this area are welcome. In common with all other Local Authorities West Berkshire's practice has developed in accordance with strict national prescription controlled through extensive guidance and further supported by the mandatory Integrated Children's System (nationally prescribed Children's Services IT System). The proposed

freedoms in this area will help to create time for Social Workers to spend more time working face to face with children and young people, though these changes will need to be planned carefully and be made in accordance to changes implemented at national level. We welcome the opportunity to develop local outcome focused performance measures and this will build on work that is already in progress.

- (b) **Local leadership** – West Berks has strong local leadership with a dedicated lead member and Director of Children's Services. Ofsted have repeatedly recognised local leadership as being good. The continued clear focus on prioritising services to the most vulnerable is evidence of leadership in action. Munro challenges all local authorities to develop models of leadership which acknowledge the complexity and uncertainty that is inherent in Child Protection to develop services that incorporate a healthy balance between the effective management of risk and the provision of service that support improved outcomes for children and young people. These issues are addressed later in this paper.
- (c) **Local partnerships** – West Berks has a strong partnership record evidenced through the development and effective working of both the Children's Trust and LSCB. The continued commitment and development of the Children's Partnership (despite the ending of the statutory requirement for Children's Trusts) evidences the ongoing local commitment of partnership working to development of early intervention services, whilst the LSCB scrutinises safeguarding practice. Both are well established and supported by partner agencies and the voluntary sector.
- (d) **Reducing the burden of inspection** – West Berks has been subject to the normal range of OFSTED processes including recent inspections of Referral and Assessment (twice), Adoption, Fostering and Castle Gate. We are expecting an announced inspection of Safeguarding and Looked After Children's Service between now and the end of March 2012: extensive time and effort has been invested in preparation for this inspection. Prior to the inspection we will receive two weeks notice followed by two weeks of the inspection. We welcome the move towards unannounced inspections only.
- (e) **Joint responsibility for "early help"** – In the Summer of 2011 West Berks participated in a peer review process (as part of a new national programme) that audited our provision in this field. It noted considerable strengths and also provided some useful direction for future development. West Berks has a strong track record in this area and has developed a good range of evidence based programmes. Though it should be noted that this area is most vulnerable to cuts as financial pressures faced by the Council and our partners continues.
- (f) **Serious Case Reviews** – West Berks has limited recent experience of the serious case review process as our last one was completed in 2007. However we welcome the recommendations for changes as the current process is onerous and of limited value in terms of learning and improving services.
- (g) **Developing the Social Work profession** – West Berks has a good record of developing Social Work Staff evidenced through good retention rates, strong investment in training and a history of positive inspection and peer review. Despite this we recognise that to achieve the ambitious cultural change required by Munro, more will need to be done to develop the confidence, competence and influence of our Children's Social Care Staff. The training and development of Social Workers in

the UK for the last 20+ years has prepared them to work in a strictly controlled, prescriptive and risk averse system, and so moving to the approach recommended by Munro will require a considerable shift in approach both locally and nationally. As part of the work to implement Munro we will need to explore the development of new social work roles including establishing a Principal Social Worker Role.

5.1 Developing a West Berks Vision for Munro

5.1.1 Munro does not set out a blue print for the ideal model for Children's Services; instead she suggest that local areas need to develop an approach that meets the needs of their local community and can be effectively delivered with the staff and resources available. Based on analysis of our current position, the proposed vision is to develop a three year programme designed to ensure our services are:

- More child centred
- Delivering effective help early, in partnership with others
- Focussing on supporting children to be in families (their own or other permanent alternatives)
- Informed by evidence and research
- Measuring success in terms of improved outcomes for children and young people

These aims link closely with the West Berks Council Strategy, which outlines as the key purpose of the Council:

- Helping you to help yourself
- Helping you when you cannot help yourself
- Providing and acting in the interests of communities people and employers in the district

In addition to this the aspirations link clearly to the Children and Young Peoples service vision, as set out in Appendix B.

To enable these developments to happen, we need to develop a work force that is:

- Confident, consistent, competent and has capacity to work directly with children and their families
- Freed from unnecessary bureaucracy and process
- Spending much of their time working directly with Children and Young People
- Valued and supported by managers and the organisation as a whole
- Has governance structures that understand the inherent complexity and uncertainty in child protection work
- That continually develops and learns
- That understands their role is to improve outcomes for the children, young people and families they work with

The changes required for our workforce are entirely congruent with our principles of:

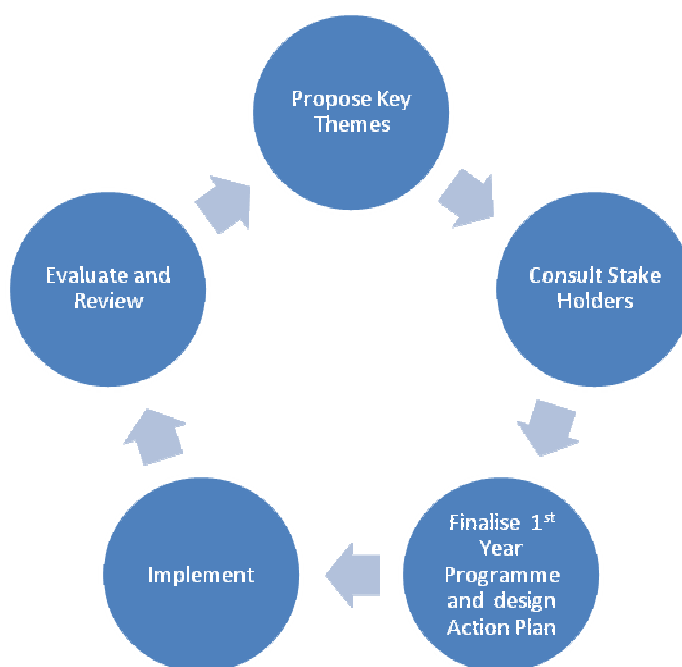
- Putting people first
- Living within our means

- Empowering people and their communities
- Transforming our services to remain affordable and effective
- Doing what's important well

5.2 Proposal for Implementing Munro Recommendations in West Berkshire

5.2.1 The proposed approach to the local implementation is a five stage process:

Stage	Key Actions	Note
1	Set out proposed key themes and recommendations for the first year's Munro change programme.	These are detailed later in this report.
2	Initial consultation/engagement with all stakeholders (over a 6-8 week period).	Consult at relevant forums, partnership boards, team meetings forums etc.
3	Develop an action plan to for implementation of the agreed recommendations.	Design project plan for first year of the programme (incorporating key issues raised through the consultation process).
4	Implement the action plan.	Plan implemented by a combination of the West Berks Munro Board and other existing boards.
5	Review and update the action plan (annual cycle for 2-3 years) This process would be managed within existing resources.	Design project plan for second year of the programme



5.2.2 Key to this process is the development of a local governance structure (Munro Review Board) to oversee the planned changes. This will need to include elected Members, a cross section of the Children's Social Care Work force and relevant partners (see Appendix C for proposed membership). As stated earlier in this report Munro does not envisage there is a quick fix to the issues identified through her

work, consequently we are suggesting a three year programme (reviewed and updated annually). Munro also presents a paradox insofar as she suggests Children's Services need to develop into an intelligent approach which responds to the individual needs of children and their families, rather than a procedure driven bureaucratic approach. This represents a significant cultural change in the way services are planned, organised and delivered.

- 5.2.3 An early task for the Munro Review Board will be to review and evaluate our current position with a view to identifying the priority areas for change. This will involve reviewing the effectiveness of current provision and assessing the readiness of our children's workforce to make the required changes. This review could be guided by the Improvement and Development Agency Safeguarding Scrutiny Guide (<http://www.idea.gov.uk/idk/aio/15327408>). The board will also have a key role in planning the design of organisational change process required to make the Munro vision a reality in the West Berks context.
- 5.2.4 The proposed key themes and actions for consultation in relation to the implementation of Munro are set out below in relation to the four areas we are able to influence (excluding reducing the burden of inspection and serious case reviews).

5.3 Key Themes

5.3.1 Developing Local Leadership

1. Develop a local governance structure for the implementation of Munro in West Berkshire.
2. Develop consultation/participation mechanisms that engages with both service users and the wider stakeholder network.
3. Ensure the development of the Community Services Directorate is completed in way that supports the aspirations of Munro in regard to Children's Social Care Services
4. Work with colleagues in the NHS to ensure strong partnership working and leadership as the health service changes take place
5. Develop clear protocols / working arrangements with other key partnership boards (specifically the Partnership Board and LSCB).
6. Commitment to development of a distributive leadership model within Children's Services designed to support and empower frontline workers and their managers. This will aim to ensure social workers are able to take decisions and be less restricted by bureaucratic processes
7. Work with and learn from other Local Authorities and organisations as they implement Munro

5.3.2 Local Practice and Reducing Prescription

8. We need to develop a stronger focus on developing services that provide effective help in a timely way: we will start to do this by reviewing the way the Referral and Assessment Team operate to provide a stronger focus on help and support for families who are beginning to experience significant difficulties.
9. We will develop a stronger 'family first' strategy designed to support children to live with their birth family where safe, and alternative permanent family based options

where this is not possible. This will start with a review of plans for all our looked after children.

10. Develop local performance measurement framework (Children's Balanced Score Card)
11. Commit to using the SCIE Serious Case Review methodology for our next management review.

Joint Response for Early Help

12. Review our current range of early intervention and prevention services to ensure that they support our aspirations to keep children safe and prevent them from needing to be looked after.
13. Complete the actions of the recent peer review to ensure that early interventions services deliver good value for money in a co-ordinated way, demonstrating real evidence of improved outcomes for children and young people.
14. Ensure early intervention resources are targeted at those in greatest need and have realistic chances of success.
15. Explore opportunities for adult and children's services to work more effectively together, in the way envisaged as part of the 'Think Family' approach, to promote good outcomes for children and their families.
16. Develop an effective commissioning strategy for early intervention services.

Developing the Social Work Profession and Local Workforce

17. Work to reduce reliance on agency staffing through better use of existing resources.
18. Develop a relationship based model for Children's Social Work designed to minimise changes of SW and maximise face to face time spent with children and their parents.
19. Explore opportunities to reduce bureaucracy within Children's Services.
20. Create opportunities to learn and disseminate the lessons from successful practice and innovation.
21. Develop the Principal Social Worker Role in the West Berks context
22. Develop a more reflective model of supervision. This will help develop a more thoughtful approach to supporting children to achieve good outcomes rather than simply complying with procedures.
23. Continue the development and embedding of the use of research and evidence based practice.
24. Improve support to help Social Workers and their managers to manage risk with confidence.

5.4 Milestones for First Year of the Munro Implementation Programme

5.4.1 The detailed action plan for the implementation of the Munro programme will be developed in consultation with key stake holders. The focus of the first year's action plan is likely to include the milestones set out below:

- Consultation with key stakeholders in relation to Munro developments
- Set up Munro Review Board
- Conduct a review of existing Safeguarding Practice
- Review and update how we conduct assessments

- Create new training and development package to equip Social Worker's skills, knowledge and confidence to meet the requirements of Munro
- Employ the SCIE SCR methodology to our next internal Case Management Review
- Review children's social care workforce career structure to promote the retention and recruitment of high quality staff
- Create role and recruit Principal Social Worker
- Identify and implement new Key Performance indicators (including combination of local and national indicators)

6. Consultation

The changes required by Munro represent a fundamental cultural change for Children Services and successful implementation will need to be informed by extensive consultation and developed in partnership with key stakeholders. These will include service users, staff and partner agencies. This consultation will need to be an ongoing process throughout the whole change programme. It is proposed that this should be achieved through a combination of existing meetings and forums combined with some processes designed exclusively in relation to Munro changes (e.g. focus groups for service users and social workers). These will be coordinated through a consultation and communication plan designed for this purpose.

7. Appendices

Appendix A – Equality Impact Assessment – Stage 1

Appendix B – Children's Services Vision ('Cloud Diagram')

Appendix C - Proposed Membership for the West Berks Munro Review Board

APPENDIX A

Equality Impact Assessment – Stage One

Name of item being assessed:	Implementing the Recommendations of the Munro Review of Child Protection - A Child Centred System
Version and release date of item (if applicable):	
Owner of item being assessed:	Mark Evans
Name of assessor:	Mark Evans
Date of assessment:	11 th November 2011

1. What are the main aims of the item?
To start the process of implementing the recommendations of the Munro Report in West Berks.

2. Note which groups may be affected by the item, consider how they may be affected and what sources of information have been used to determine this. (Please demonstrate consideration of all strands – age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation)		
Group Affected	What might be the effect?	Information to support this.
Children and young people	Changes in the way we deliver services to protect and support children and young people.	Munro Report – Changes are designed to benefit children and young people.
Parents	Changes in the way we deliver services to protect and support parents.	Munro Report – Changes are designed to benefit parents.
Further comments relating to the item:		

3. Result (please tick by double-clicking on relevant box and click on 'checked')
<input type="checkbox"/> High Relevance - This needs to undergo a Stage 2 Equality Impact Assessment
<input type="checkbox"/> Medium Relevance - This needs to undergo a Stage 2 Equality Impact Assessment

<input type="checkbox"/>	Low Relevance - This needs to undergo a Stage 2 Equality Impact Assessment
<input checked="" type="checkbox"/>	No Relevance - This does not need to undergo a Stage 2 Equality Impact Assessment

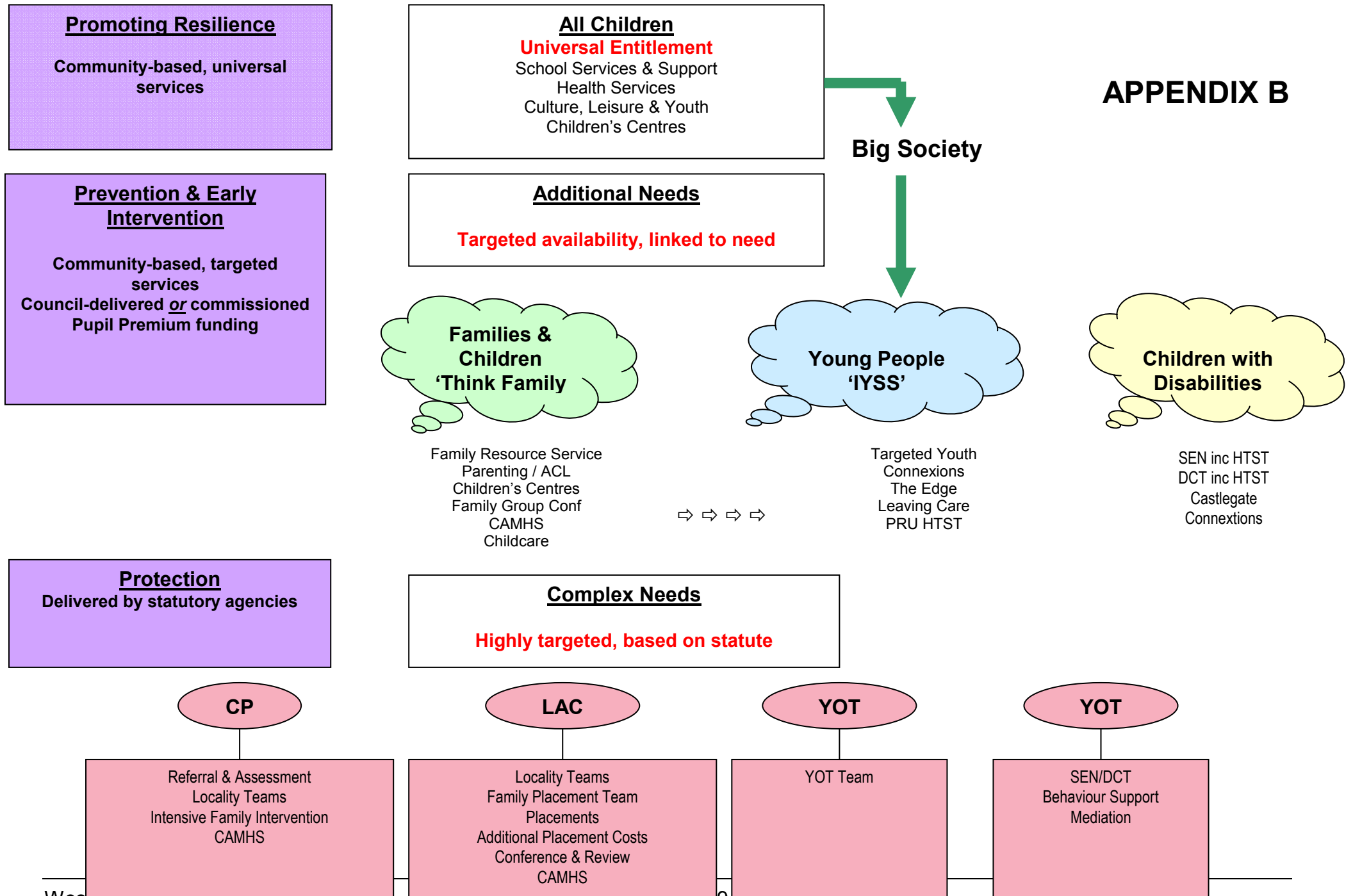
For items requiring a Stage 2 equality impact assessment, begin the planning of this now, referring to the equality impact assessment guidance and Stage 2 template.

4. Identify next steps as appropriate:	
Stage Two required	
Owner of Stage Two assessment:	
Timescale for Stage Two assessment:	
Stage Two not required:	

Name:

Date:

APPENDIX B



Proposed Membership of the Munro Review Board

Chief Executive
Lead Member for Children's Services
Lead Member for Transformation Board
Other Elected Members
Head of Children's Services
Representative from Adult Services
Representative from Human Resources
Representatives of other services as relevant
4 Other Representatives of Children's Services (including frontline staff)
2 School Representatives
Early Years Representatives
PCT Representative
Other partner organisations as appropriate
Voluntary Sector Representatives