

National Institute for Health and Clinical Excellence

PUBLIC HEALTH INTERVENTION GUIDANCE: Preventing unintentional injuries in the home among under 15s: providing safety equipment and home-risk assessments

Consultation on the Draft Guidance from 4th November – 2nd December 2009

Comments on the Draft Guidance to be submitted no later than
5pm on Wednesday 2nd December 2009

Stakeholder Comments

Please use this form for submitting your comments to the Institute.

1. Please put each new comment in a new row.
2. Please insert the **section title or number** (eg introduction or section 2) in the 1st column. If your comment relates to the document as a whole, please put '**general**' in this column

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Organisation:	Response submitted on behalf of CHAPPIE Wales (Child Accident Prevention Practice and Information Exchange)
Section number Indicate section title or number or ' general ' if your comment relates to the whole document	Comments Please insert each new comment in a new row.
Context	Practitioners and policy makers will use and make reference to the NICE guidelines to inform future unintentional injury work. The guidelines should therefore be as informative as possible. This is particularly true of the types of equipment that NICE have referred to. We recommend using the term <i>Window Restrictor</i> rather than <i>Window Locks</i> as they are very different items, using the terms <i>cupboard and drawer restrictors</i> and specifying what is meant by <i>oven guard</i> (is this an oven door guard or a hob guard?). Recommendation 1 refers to " <i>a lack of appropriately installed safety equipment</i> ", but the guidelines do not identify what is effective or appropriate equipment, for example, there is no mention of securely fitted fireguards. We understand that individual households will differ in their equipment needs, but a list of effective equipment would be useful to policy makers, managers and practitioners.

Please add extra rows as needed

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Recommendation 1	<p>The guidelines aim to prioritise households at greatest risk. In doing so, it should be established that those at greatest risk of unintentional home injury are aged under 5 years and not under 15 years. This should be mirrored throughout the document.</p> <p>Children between the ages of 5-15 years have a greatly reduced risk of a home accident compared to those aged under 5 years. Recommendation 3 states that home risk assessments be prioritised and delivered to those households with the greatest risk. In order for home safety schemes to be targeted where the need is greatest and to be effective in reducing the number of children who are killed, seriously injured and disabled, then the guidelines should identify the age range that is most at risk.</p> <p>It should also be noted that families living in particular types of housing have an increased risk of injury and we recommend that this should also be cited in terms of priority and risk identification (Lyons et al. AJPM 2006; 30:513-520)</p>
Recommendation 1	<p>The use of existing data on children and families may cause issues with data protection and caution needs to be given. However, the sharing of anonymised, but relevant data is possible and this should be recommended within the guidelines.</p>
Recommendation 2	<p>Many partners have a role to play in the reduction of unintentional injuries, however, this is not necessarily recognised by a number of potential partners. Therefore, we would recommend changing the following wording "<i>Others with a remit to prevent unintentional injury in the home</i>" to "<i>Others with a remit to improve the health and well-being of children</i>"</p>
Recommendation 2	<p>Spelling error – under "<i>What action should they take</i>" change heath to health</p>
Recommendation 2	<p>Accident and Emergency departments should also be cited as active partners, particularly as the need to collect and collate data is crucial.</p>
Recommendation 2	<p>The guidelines state that local communities should be used to promote home safety interventions and we agree that this is essential for an effective and successful home safety equipment scheme. Local community groups must therefore, be involved as a partner from the planning stage and cited under "<i>Who should take action?</i>" section.</p>
Recommendation 2	<p>Further clarification is needed in terms of 'identify and prioritise households'. Definitions need to be made to establish who is most at risk and from what type of injury mechanism.</p>

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Recommendation 2	The guidelines make reference to acquiring information from hospitals about injuries. However, evidence reveals that rural areas are more likely to access their local GP or minor injuries unit. It is therefore vital that contacts are made between GP and community nurses in order to share additional and valuable information.
Recommendation 3	In reducing unintentional injuries in the home, behavioural advice is as crucial as the correct type and fitting of safety equipment. To acknowledge the importance of these areas, we recommend that the first bullet point be changed to the following: <i>“Offer home risk assessments by appropriately trained assessors, to the households identified and prioritised in recommendations 1 and 2. Where appropriate, behavioural advice should be given and high quality home safety equipment supplied and installed. Advice on how to correctly use and maintain the equipment should also be given”</i> Where the guidelines have stated “suitable, this should be qualified and identified. “Suitable” should be fit for purpose for the reduction of those mechanisms that cause the most serious injuries. These accident mechanisms should also be identified within the guidelines, for example; falls, burns, scalds, fire, poisoning etc.
Recommendation 3	Second bullet point. We recommend changing the wording to include emphasis on other factors that influence injuries. For example; “...vigilant about home safety, the stages of childhood development, outline why safety equipment has been installed and how to use it correctly and the dangers of disabling it”.
Recommendation 3	Final bullet point. This point recommends conducting a home risk assessment where necessary. However, unless an assessment has been conducted, it is difficult to identify if it is necessary. We recommend replacing the word “necessary” with “possible”.
General	Practitioners, installers and assessors should be CRB checked before entering households.
General	Installers should be appropriately trained in home injury prevention as installers will be the first port of call for equipment queries from householders.
General	Guidelines should be stated for a maximum time between the home risk assessment and equipment installation
General	Parenting groups should be involved in intervention planning.
General	The UNCRC (United Convention of the Rights of the Child) should be cited within the guidelines. For example, Article 6, Article 19, Article 27, Article 33, Article 36.

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General	The guidelines make reference to reducing injuries amongst the most deprived. We are concerned that there is no reference to narrowing the inequalities gap
General	Inconvenience to householders should be minimised, including unnecessary visits, contact and information collection. Therefore all agencies and partners should use the same policies, procedures, risk assessment documents and databases
General	The guidelines recommend a home safety risk assessment but does not give guidance on specific issues that should be assessed, what type of injuries cause the most serious, fatal or disabling accidents or which items are effective in reducing these injuries. We recommend that as part of the NICE guidelines, recommendations are made stating which injury mechanisms should be prioritised, which equipment should be used and identified guidelines for the risk assessment checklist
General	The Child Safety Steering group for Wales, facilitated and coordinated by Children in Wales and chaired by Professor Ronan Lyons have produced a document "Working Towards a Child Safety Strategy for Wales". This document makes recommendations in a number of unintentional areas, including home injury prevention. This document can be viewed at the following link: http://www.childreninwales.org.uk/areasofwork/childsafety/index.html

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