VOICE OF THE CHILD
THE UNITED KINGDOM PERSPECTIVE – AN OVERVIEW

By ROGER ALLEN BIRCH[1]

1. Before I review the "Voice of the Child" from a United Kingdom perspective I will explain the term United Kingdom (UK). The UK of Great Britain and Northern Ireland comprises England, Wales, Scotland and Northern Ireland. It is a constitutional monarchy with no written constitution and relies on the principles of parliamentary sovereignty and the rule of law. There is a common law system in place in England, Wales and Northern Ireland and a mixed common law system and civil law system in Scotland.

2. It should be noted that in the UK, international obligations have to be formally incorporated into domestic law before the courts are obliged to apply them. An example is The European Convention on Human Rights (ECHR) which has been incorporated through the Human Rights Act 1998 and which came into force in 2000.

3. A good starting point in a review of the "Voice of the Child" is to refer to article 12 of the UN Convention on the Rights of the Child (CRC)[2], I quote:

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"1. States Parties shall assure to the child who is capable of forming his or her own views the right to express those views freely in all matters affecting the child, the views of the child being given due weight in accordance with the age and maturity of the child.

"2. For this purpose, the child shall in particular be provided the opportunity to be heard in any judicial and administrative proceedings affecting the child, either directly, or through a representative or an appropriate body, in a manner consistent with the procedural rules of national law."

4. The CRC has **not** been incorporated into UK domestic law. However, in the case of A City Council v T (Mother, J (Father) and K by her Children's Guardian[3] Mr Justice Peter Jackson stated that "Article 12 of the CRC carries a moral, though not legal, authority …". It has been advanced by the UK's four Children's Commissioners[4] and the Westminster Parliament's Joint Committee on Human Rights[5] that the CRC should be incorporated into UK domestic law. In 2011 the Government responded that the UK meets its obligations under the CRC "through a mixture of legislative and policy initiatives.[6]

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[2] Convention on the Rights of the Child – General Assembly Resolution 44/25 of 20 November 1989 – entry into force 2 September 1990, in accordance with article 49. The UK ratified the CRC on the 16 December 1991. Originally, the UK had four reservations to the CRC relating to: (i) the primacy of domestic immigration and national law, (ii) child employment, (iii) children's hearings in Scotland and (iv) placing children in adult custodial establishments. The reservations on child employment and children's hearings were withdrawn in 1997, and those on immigration and children in custody in 2008.
[3] [2011] EWHC 1082 Fam; [2011] 2 FLR 803
[4] UK Children's Commissioners, report to the UN Committee on the Rights of the Child, paragraph 9
[5] Joint Committee on Human Rights, Children's Rights: 25th report of session 2008-09, 2009, paragraph 19
[6] House of Commons Hansard, vol. 532,col. 906W, 2011

5. However, significant reform has taken place in the UK. An example is contained in Section 1 to the Children's Act 1989 wherein it refers to the "Welfare of the Child" and provides that when a court determines any question with respect to the upbringing of a child, or the administration of a child's property or the application of any income arising from it, the child's welfare shall be the court's paramount consideration.

THE IMPLEMENTATION OF THE "VOICE OF THE CHILD"

6. The procedural rules in England and Wales left it to the professionals to communicate with the child and pass on that communication to the court. In private law proceedings, it is carried out by CAFCASS[7] reporting officers and in public law proceedings (care proceedings) it is carried out through the Children's Guardian[8] with the help of the child's lawyer.

7. The principal function of CAFCASS, inter alia, is to safeguard and promote the welfare of children and also to make provision for children to be represented in such proceedings.[9]

8. The Children's Guardian must appoint a solicitor for the child unless a solicitor has already been appointed, give such advice to the child as is appropriate having regard to that child's understanding; and where appropriate instruct the solicitor

[7] Children and Family Court Advisory and Support Service are a non-departmental public body set up to promote the welfare of children and families involved in the family court. CAFCASS was formed under the provisions of the Criminal Justice and Court Services Act 2000 (2000 Act)
[8] Appointed under Rule 16.3 of the Family Procedure Rules 2010 as amended (FPR)
[9] Section 12 of the 2000 Act

representing the child on all matters relevant to the interests of the child arising in the course of proceedings, including the possibilities for appeal.[10]

9. Lady Hale in an address to the Association of Lawyers for Children Annual Conference 2015 in Manchester[11] quoted from Dr David Jones, in a paper for the President's Interdisciplinary Conference wherein he stated:

"First, children want to communicate. If the lines of communication are not opened up for them at difficult times, then sooner or later they will wish they could have had their say, and that someone has asked them to do so earlier.

Second, children have a right to know what is going on around them and to understand important matters about themselves.

Third, children need protection from present or likely harm, so they need to be able to tell people about this, and people need to be able to pick up on the signs and ask them about it.

Lastly, children need protection from the harm which may come to them in future if they are kept in ignorance of or are unable to talk about important matters in their lives."

[10] Rule 6.2 of the FPR
[11] Lady Hale, Deputy President of the Supreme Court in an address entitled "Are we there yet"

10. Lady Hale then went on to comment:

"Not all of those four reasons are directed at courts as opposed to child care professionals but the second and third undoubtedly are relevant to what courts have to do to protect children from harm. Courts cannot just think of children as the object of the proceedings. They have to think of children both as witnesses to the facts and as participants in the decision-making process about their own futures.

11. Looking at the comment of Lady Hale it is apparent that there has been a tendency to consider children as the objects of proceedings wherein they should be the contributors to the proceedings in the decision process which will directly affect them.

12. I now propose to run through some of the case law which has developed the approach to ascertaining the views of the child in the decision making process.

13. In the case of Re M (A Minor) (Justices Discretion)[12] Mrs Justice Booth stated that although the court was bound by Section 1 (3) of the Children's Act 1989 (the 1989 Act) to consider the child's ascertainable wishes and feelings, it should not be necessary, nor in general was it desirable, save in exceptional cases, for the magistrates to see the child in private where a Guardian ad litem or Welfare Officer was involved. The Magistrates saw the child in their room only for a relatively short time, in contrast to the Welfare Officer's enquires. The Magistrates failed to give

[12] [1993] 2 F.L.R 706

sufficient weight to the Welfare Officer's report and to his evidence, and did not sufficiently explain in their reasons why they differed from the report's conclusions.

14. This is a case which came to the conclusion that it was not desirable, save in "exceptional circumstances" for a child to be in court and/or see the magistrates in private. Likewise, if magistrates cannot see a child in private then why should a judge should be allowed to see a child in private.

15. Of course, if a Judge and/or Magistrate were to see a child in private they would have to explain that if they heard anything which might influence their decision, they will have to tell the parties, so that they can have a proper opportunity of dealing with it, by evidence or argument. The only confidentiality is the discussion between the child and their lawyer. The case of Re F[13] is an example of the difficulties that can occur. I will mention this case in more detail later on.

16. In April 2010 the Family Justice Council issued *Guidelines for Judges Meeting Children who are subject to Family Proceedings.* The reason for the Guidelines was "to encourage judges to enable children to feel more involved and connected with proceedings in which important decisions are made in their lives and to give them an opportunity to satisfy themselves that the Judge has understood their wishes and feelings and to understand the nature of the judge's task".

[13] Re F (Child's Objections) [2015] EWCA 1022]

17. The President of the Family Division indicated the need for a review of the 2010 guidelines. There were two pilot projects in Leeds and York. Both reports assumed that one purpose is to enable the child to tell the judges their wishes and feelings. The "Top tips for children" in the Leeds report, began by saying that "it is important to remember that the meeting is to make sure that the wishes and feelings have been heard and that they have been listened to". The overall conclusion of the York report was that the opportunity of meeting with a judge is beneficial for children, but it is not the only way in which they can communicate their wishes and feeing to the court. They would encourage a national roll-out, but with "standardised process and documentation". [14]

ATTENDANCE AT HEARINGS

18. The current Family Procedural Rules, 12.14[15] states,

Rule 12.14 (2)

Unless a court directs otherwise and subject to paragraph (3), the persons who must attend a hearing are:

(a) any party to the proceedings;

(b) any litigation friend for any party or legal representative instructed to act on that party's behalf; and

(c) any other party directed by the court …

[14] H Barret, HHJ Hillier, A Johal, Children and Young People Meeting Judges and Magistrates, Evaluation Report of the West Yorkshire Project; HHJ Finnerty, M Gittims, P Scatcherd, Children and Young People Meeting Judges and Magistrates, Evaluation Report of the York and North Yorkshire Project; both May 2015, FJYPB, Cafcass, HMCTS

[15] Family Procedural Rules 2010

Rule 12.14 (3) states:

"Proceedings or any part of them **will** take place in the absence of a child who is a party to the proceedings if –

(a) the court considers it is in the interests of the child, having regard to the matters to be discussed or the evidence likely to be given, and

(b) the child is represented by a children's guardian or solicitor"

Rule 12.14 (4) states:

When considering the interests of the chid under paragraph (3) the court will give-

(a) the children's guardian

(b) the solicitor for the child; and

(c) the child, if of sufficient understanding,

an opportunity to make representations.

19. The effect of rule 12.14 (2) is to require the child, **if he is a party,** to be present at hearings unless the court otherwise directs under Rule 12.14 (3). In the case of A City Council v T, J and K[16] Mr Justice Peter Jackson had to decide whether a 13 year old girl should attend a hearing of an application by her Local Authority to keep her in secure accommodation for three months. K wanted to be at the hearing but her Guardian and the Local Authority opposed her attendance on welfare grounds. They submitted that it was not in her best interest to attend the hearing because of "her high level of aggression and volatility". The Judge not satisfied that it was against K's interest to attend the hearing, ordered that she should attend.

[16] [2011] 2FLR 803

20. Mr Justice Peter Jackson further stated:

"The participation of children in legal proceedings about their future is a topic that invokes a range of responses from adults, and also from children.

The majority adult view has moved a long way from the days when children were seen and not heard, but the feeling that it is not good for children to be personally involved in every aspect of our adversarial system is still deep routed. Proper concerns include a fear that direct exposure to conflict will harm already vulnerable children, a worry that greater participation will leave children open to manipulation by unscrupulous parents, and a feeling that the presence of a child in a courtroom is somehow inappropriate.

Whilst it would be extremely unusual for a hearing to take place in the absence of an adult party who wanted to attend, both public and private law proceedings take place in the absence of the child"

21. Article 12 of the CRC was referred to by Mr Justice Peter Jackson in his judgment.

22. It is reasonable to state that the Rules do not contain a built in presumption that a child should not be allowed to attend court. So the starting point should be an open evaluation of the consequences of attendance or non-attendance. The relevant factors would generally include:

(i) The age and level of understanding of the child

(ii) The nature and strength of the child's wishes

(iii) The child's emotional and psychological state

(iv) The effect of influence from others

(v) The matters to be discussed

(vi) The evidence to be given

(vii) The child's behaviour

(viii) The practical and logistical considerations and

(ix) The integrity of the proceedings

An evaluation of these factors may well lead to the conclusion that a child has sufficient understanding who wants to attend an important hearing about his or her future should be allowed to do so, for at least part of the time, unless there are clear reasons justifying refusal.

23. In the case of Mabon v Mabon and Others[17] the Court of Appeal had to deal with an appeal to the Court of Appeal against the refusal of the trial Judge to allow separate representation for three children aged 13, 15 and 17 in an action by the mother for a Residence Order under Section 8 of the Children Act 1989 against the father. There were six children of the marriage and the mother's application was in respect of the six children that she should be granted a Residence Order.

24. A CAFCASS officer filed his first report and was appointed Guardian of all six children who were joined in the proceedings as parties to be represented by the Guardian.

[17] [2005] 3 W.L.R.460

25. During the trial the three eldest children, 13, 15 and 17 sought to be separately represented. The Judge refused. On appeal by the three children to the Court of Appeal, the Court allowing the appeal stated:

"that the guardian's first priority was to advocate the welfare of the child and his second priority was to put before the court the child's feelings and wishes and sometimes those priorities could conflict" .

26. In the judgment of Lord Justice Thorpe at paragraph 26 he stated that the rule (Rule 9 of the previous 1992 Family Proceedings Rules) was "sufficiently widely framed to meet our obligations to comply with both article 12 of United Nations Convention on the Rights of the Child and article 8 of the European Convention of Human Rights, providing that judges correctly focus on the sufficiency of the child's understanding and, in measuring that sufficiently, reflect the extent to which, in the 21st century, there is a keener appreciation of the autonomy of the child and the child's consequential right to participate in decision making processes that fundamentally affect his family life"

27. At paragraph 32 of the Judgment of Lord Justice Thorpe he stated:

"In conclusion this case provides a timely opportunity to recognise the growing acknowledgement of the autonomy and consequential rights of children, both nationally and internationally."

28. In the case of Mabon v Mabon there was a conflict between the Mother, the Father and the Children's Guardian. The old system of the paternalistic approach has been replaced by considering, where appropriate, the child's wishes. These wishes being considered in the light of the factors set out in paragraph 22 of this note.

29. Another interesting case is Re F (Child's Objections)[18] . This was an appeal to the Court of Appeal against HHJ Bellamy, sitting as a High Court Judge. The judge made an order under the 1980 Hague Convention on the Civil Aspects of International Child Abduction (the Convention) for the return of four children to Australia. The application for a return order was made by the children's mother, the Respondent being the father, with whom they are presently living in England, having been wrongly retained here following a holiday over Christmas and New Year 2014/2015. The children are Simon (aged 13), Clare and Peter (twins aged 10) and Harry (aged 9). They were not parties to the proceedings before HHJ Bellamy but were given permission to appeal out of time against the Judge's Order. The central issue in the appeal is the judge's treatment of the views of the children and, in particular, whether he should have treated those views as objections for the purposes of Article 13 of the Convention and, in the excise of his discretion, refuse to order the children's return.

[18] [2015] EWCA 1022 – a decision of the Court of Appeal Civil Division

30. It is interesting to note that HHJ Bellamy had become concerned that Clare had been given the opportunity to write a letter to the judge, and the CAFCASS officer had not addressed in her report the issue of whether the children should meet the judge and nor was it raised with the CAFCASS officer in her oral evidence. An e-mail exchange then took place between the judge and the parents' counsel and the judge decided that he would meet the children, which he did by video link, spending around 20 minutes with them. A local CAFCASS officer was in attendance.

31. At paragraph 57 of her judgment Lady Justice Black stated:

"… I would only emphasise that when a meeting is to take place between the judge and the children involved in the proceedings, it needs very careful planning. I am not persuaded of the wisdom of a meeting set up in the way that this meeting was and at this particular stage of the proceedings. Furthermore, it is important that whenever there is a meeting between the judge and a child or children, care is taken to ensure that the parties have the opportunity to make submissions about what emerges."

At paragraph 58 of her judgment Lady Justice Black further stated:

"I do not say anything about the complaint that the children were not joined as parties in the proceedings below. If that was a problem, it has been remedied by their full participation in the appeal process. I do stress again, however, how

important it is for consideration to be given at the earliest possible stage in Hague proceedings to how the children are to participate".

32. This case is a good example of the difficulties of a judge deciding to meet the children. It is also raises the difficulty that if the judge is meeting with the children that the parties have the opportunity to comment on the exchange in that meeting. It also highlight the need to consider whether the child and/or children should be joined as parties at an early stage in the proceedings so that their views can be expressed to the court and that each party then being given the opportunity of making submissions on those views.

33. Of course we have to remember that the Supreme Court has done away with the presumption that children should not give evidence.[19] A Working Party was set up under Lord Justice Thorpe to produce Guidelines[20] following the request to the President of the Family Division by the Court of Appeal in Re W[21], a case which considered the issue of children given evidence in family proceedings.

34. That same case then went to the Supreme Court and is reported as Re W [2010] UKSC 12. It is now the leading authority on the issue.

[19] Re W (Children) [2010] UKSC 12
[20] Guidelines in Relation to Children Giving Evidence in Family Proceedings – Family Justice Council 11/01/04
[21] [2010] Civ 57 – when the case was in the Court of Appeal

35. It is to be noted that hearsay evidence is admissible in family proceedings[22]. Furthermore, Section 96 of the Children Act 1989 provides that even where a child does not understand the nature of an oath, the child's evidence may still be heard by the court in civil proceedings.

36. The Guidelines assist and deal with the issues of whether a child should be further questioned or give evidence in family proceedings and these should be considered at the earliest possible opportunity by the Court and all the parties and not left to the party intending to so apply.

At paragraph 8 the Guidelines state:

"In light of Re W, in deciding whether a child should give evidence, the court's principal objective should be achieving a fair trial.

At paragraph 9 the Guidelines state:

"With that objective the court should carry out a balancing exercise between the following primary considerations:

(i) The possible advantages that the child being called will bring to the determination of truth balanced against;

[22] Children (Admissibility of Hearsay Evidence) Order 1993 S1 1993/621 – Civil Proceedings before the High Court or a County Court and Civil Proceedings under the Child Support Act 1991 in the Magistrates Court

(ii) The possible damage to the child's welfare from giving evidence i.e. the risk of harm to the child from giving evidence

The Guidelines sets out a series of practice procedures which should be undertaken.

37. In the case of Re S (Children)[23] the Local Authority commenced care proceedings because the appellant's sister, K, complained of being sexually abused over a prolonged period of time. The Local Authority commenced care proceedings and relied upon the sexual abuse. HHJ Moir found these allegations proved. Care proceedings were concluded on the 8 December 2014 with the making of a supervision order in relation to the children, who were to live with the mother. The court allowed a reasonable time to be spent with the Appellant. This was to be weekly supervised contact.

38. K withdrew the allegations of the sexual abuse and the decision had to be taken whether K should be allowed to give evidence at the finding of fact hearing in the care proceedings. The Judge recognised the central importance of K's allegation in the care proceedings, which essentially turned on what she had said occurred. The Judge had in mind Re W[24] and the Guidelines[25]. The Judge decided that K should not be required to give oral evidence. Part of the reasons the Judge gave for not calling K, is that "K was a vulnerable young girl who does not understand her own emotions". Further, "K was anxious to reunite her family, the fact that she

[23] [2016] EWCA Civ 83
[24] [2010] UKSC 12
[25] Guidelines in Relation to Children giving evidence in Family Proceedings – Family Justice Council – 11/01/04

maintained the truth of the allegations and retracted the allegations at various stages and the fact that she was unwilling to give evidence must raise concern as to the quality of the evidence which she will give, even if it was by video link".

39. The Court of Appeal affirmed the decision of HHJ Moir. However, there was a **dissenting** judgment of Lady Justice Gloster in which her Ladyship stated at paragraph 63:

"This case cried out for special measures[26] so as to ensure that the judge received direct evidence from K in relation to the allegations, and, in particular, her retracting of them, and was not forced to rely on the very unsatisfactory secondary evidence of the social worker and the Guardian as to their interpretation of K's evidence.

40. In my submission I prefer the judgment of Lady Justice Gloster. These are serious allegations and K should have been allowed to express her views on the making of such serious allegations and the reasons for their withdrawal.

41. There has been a development in the Criminal Procedure system to provide for children to give evidence in criminal cases. The Family Procedure system has not developed in the same way. The difficulties of children giving evidence in sexual

[26] Special measures for children and vulnerable adults giving evidence were created by the Youth Justice and Criminal Evidence Act 1999 (the 1999 Act). Sections 23 to 30 create a series of measures. For example, Section 23 provides for the screening of witnesses from the accused; Section 24 provides that evidence can be given by a live link; Section 25 provides for evidence to be given in private; Section 27 provides for video evidence to be provided in chief. These measures assist in the giving of evidence and allowing some protection from the difficulties of orally giving evidence in Court.

abuse cases in the Criminal Courts cannot be any more harrowing than giving evidence in the Family Courts. These are emotional issues. There has always been the issue of the paternal approach, adults/professionals knowing better in Family Proceedings. This is not always the case and thus the development of the need for the child to be recognised as an individual and within the circumstances of a particular case they have to be listened to and not simply treated as the object of the proceedings.

OTHER ASPECTS IN THE DEVELOPMENT OF THE VOICE OF THE CHILD

42. There are other provisions which assist in giving support in providing the ability of the "Voice of the Child" to be recognised and taken into account. The Family Justice Young Peoples Board[27] (FJYPB) is a group of over 40 children and young people aged between 8 and 25 years old, who live across England. The FJYPB works to promote its own voice and the voices of thousands more children and young people that experience family breakdown, including those children and young people who do not have access to court proceedings. The UK Government in an explanatory note on the FJYPB[28] states:

"The FJYPB [in its role in promoting "The Voice of the Child"] does this by actively taking part in various meetings, projects and events, working together with various agencies and organisations, to ensure the board members get the chance to express a view, influence decision-making and effect change".

[27] Family Justice Young Peoples Board – Groups – Gov.Uk
[28] Contact details for the FJYPB are: FJYPB@cafcass.gsi.gov.uk

The main types of work include, for example:

(i) Reviewing services within the family justice system, for example CAFCASS offices, courts and NACCC contact centres

(ii) Regularly attending board meetings with various agencies and stakeholders, such as local FJB's and CAFCASS Board meetings

(iii) Planning and delivering the FJYPB annual "Voice of the Child" conference.

43. Since 2013, the FJYPB has run two "Voice of the Child" conferences. The purpose of the conferences is to provide a day "… to showcase the Board's work and promote the "Voice of the Child" to a whole range of delegates"

44. At the 2014 conference, Simon Hughes MP, Minister for Justice and Civil Liberties (the Minister)[29] announced that:

"children and young people would be able to communicate their views to the judge by appropriate means. The Minister also said the government would work with the mediation sector to give children a clearer voice in mediation"

45. In 2014 the Minister established the "Voice of the Child" Dispute Resolution Group "to ensure the necessary steps are taken to promote child inclusive practice and that

[29] Simon Hughes has since lost his seat in the parliamentary elections of 2015 and there is now Conservative Government in place of the coalition Government of the Conservatives and the Liberal Democrats

the voices of children and young people are heard in all private family law proceedings which impact on them"[30]

46. In a letter dated the 18 March 2015[31] the Minister endorsed a number of recommendations which are contained in Annex A of the Advisory Groups Report. In particular,

"The principle of child inclusive practice and the adoption of a non-legal presumption that all children and young people aged 10 and above should be offered the opportunity to have their voices heard during dispute resolution processes, including mediation, if they wish"

The Minister when on to state in the letter:

"As I said at the Voice of the Child Conference, I firmly believe that children and young people should routinely have the opportunity to have a say in matters which affect their future and agree that this should be a non-legal presumption.

"That where any form of out of court dispute resolution has involved a child/young person, and the parties achieve agreement, any memorandum of understanding or agreement should reflect the participation of the child. This should also be reflected in any subsequent Consent Order"

[30] Report of the Voice of the Child Dispute Resolution Advisory Group
[31] The Minister's Letter dated the 18 March 2015 from the Ministry of Justice to the Dispute Resolution Professionals

What concerns me is the arbitrary cut off at the age of 10 years because it depends on the ability of the child. It could be a 10 years not capable and I anticipate problems in this area.

47. I have contacted the Ministry of Justice for an update on the current Government position and I was informed in a letter dated the 9 March 2016 that:

"At the 'Voice of the Child' conference in July 2015, the current Minister, Caroline Dinenage MP reiterated her desire for children and young people to have the opportunity to engage in the dispute resolution process in a manner which is appropriate to them, should they wish to do so. Just before Christmas (2015), the Minister also announced her intent to reform the private family law system so that it better supports separating couples and minimises the damage to their children"

48. In 2014 Sir James Munby, President of the Family Division, in the case of S v S (Arbitral Award: Approval) Practice Note[32] affirmed and approved a financial award made by an arbitrator appointed under the IFLA arbitration scheme. In his judgment the President said:

"There is no conceptual difference between the parties making the agreement and agreeing to give the arbitrator the power to make the decision for them".

[32] [2014] EWHC 7 (Fam) and [2014} 1 W.L.R. 2299

49. In the Practice Guidance[33] the President stated in paragraph 2:

> "It is a fundamental requirement of this Guidance that the arbitrator will decide the substance of the dispute only in accordance with the law of England and Wales. This Guidance does not apply to, or sanction, any arbitral process based on a different system of law nor, in particular, one where there is reason to believe that, whatever system of law is purportedly being applied, there may have been gender-based discrimination".

I mention this paragraph and perhaps this should be the subject of a separate discussion. Sharia Law springs to mind.

50. Following a strong endorsement from the judiciary, a new Family Law Children Arbitration Scheme (the Children Scheme) has been developed, which will launch later this year (2016) to take its place alongside the established financial scheme. The new scheme will offer the opportunity to resolve disputes concerning the exercise of parental responsibility and other private family law issues about the welfare of children by arbitration. The rules of the scheme are currently being finalised and roll-out is planned for July of 2016.

[33] Arbitration in the Family Court – Practice Guidance issued on the 23 November 2015 by Sir James Munby, President of the Family Division

51. I hope that this note provides some insight to the development of the “Voice of the Child” in the United Kingdom.

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