

# Agenda – Children, Young People and Education Committee

---

Meeting Venue:	For further information contact:
Hybrid – Committee room 4 Tŷ Hywel and video conference via Zoom	Naomi Stocks Committee Clerk
Meeting date: 19 September 2024	0300 200 6565
Meeting time: 09.30	<a href="mailto:SeneddChildren@senedd.wales">SeneddChildren@senedd.wales</a>

## Hybrid

---

### Private Pre-meeting

(09.15 – 09.30)

### Public meeting

(09.30)

#### 1 Introductions, apologies, substitutions and declarations of interest

(09.30)

#### 2 Children and Young People on the margins – evidence session

(09.30 – 11.00)

(Pages 1 – 45)

Jane Hutt MS, Cabinet Secretary for Social Justice, Trefnydd and Chief Whip

Dawn Bowden MS, Minister for Children and Social Care

Taryn Stephens, Deputy Director Social Services Improvement, Welsh Government

Alistair Davey, Deputy Director Social Services Enabling, Welsh Government

Attached Documents:

Research Brief

Paper 1 – Welsh Government

Paper 2 – NYAS



## **Break**

(11.00 – 11.15)

### **3 Welsh Language and Education (Wales) Bill – evidence session 1**

(11.15 – 12.45)

(Pages 46 – 87)

Mark Drakeford MS, Cabinet Secretary for Finance and Welsh Language

Bethan Webb, Deputy Director, Cymraeg 2050, Welsh Government

Iwan Roberts, Senior Lawyer, Welsh Government

Attached Documents:

Research Brief

### **4 Papers to note**

(12.45)

#### **4.1 Children and Young People on the margins**

(Pages 88 – 90)

Attached Documents:

Letter from the Chair of the Children, Young People and Education

Committee to the Cabinet Secretary for Culture, Social Justice, Trefnydd and

Chief Whip and the Minister for Social Care

#### **4.2 Health and Social Care (Wales) Bill**

(Pages 91 – 106)

Attached Documents:

Letter from the Chair of the Children, Young People and Education

Committee to the Temporary Chair of the Health and Social Care Committee

#### **4.3 Information from Stakeholders**

(Pages 107 – 108)

Attached Documents:

Briefing note from the Bevan Foundation on Free School Meals

#### **4.4 Welsh Language and Education (Wales) Bill**

(Pages 109 – 111)

Attached Documents:

Letter from the Chair of the Children, Young People and Education Committee to the Chair of the Culture, Welsh Language, Sport and International Relations

#### **4.5 Children and Young People on the margins**

(Pages 112 – 117)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee from Aneurin Bevan University Health Board

#### **4.6 Children and Young People on the margins**

(Pages 118 – 132)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee from Policing in Wales

#### **4.7 Children and Young People on the margins**

(Pages 133 – 135)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee from Hywel Dda University Health Board

#### **4.8 Children and Young People on the margins**

(Pages 136 – 139)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee from the Association of Directors of Education in Wales

#### **4.9 Children and Young People on the margins**

(Pages 140 – 141)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee from Powys Teaching Health Board

#### **4.10 Children and Young People on the margins**

(Pages 142 – 144)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee from Cwm Taf Morgannwg University Health Board

#### **4.11 Children and Young People on the margins**

(Pages 145 – 150)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee from the Cabinet Secretary for Culture and Social Justice, Trefnydd and Chief Whip and the Minister for Social Care

#### **4.12 Teacher recruitment and retention**

(Pages 151 – 166)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee from the Cabinet Secretary for Education

#### **4.13 Welsh Language and Education (Wales) Bill**

(Page 167)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee from the Chair of the Culture, Communications, Welsh Language, Sport and International Relations Committee

### **5 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the remainder of this meeting**

(12.45)

### **Private meeting**

(12.45 – 13.15)

**6 Consideration of the evidence heard in the previous evidence sessions**

(12.45 – 13.00)

**7 Welsh Government Draft Budget 2025–26 – consideration of the scope and approach**

(13.00 – 13.15)

(Pages 168 – 173)

Attached Documents:

Private papers – Scope and approach

Document is Restricted



# Children and Young People on the margins

Evidence to the Children, Young  
People and Education  
Committee

## Contents

<b>1. Introduction.....</b>	<b>3</b>
<b>2. What we know about the nature and scale of these safeguarding issues.....</b>	<b>4</b>
<b>3. Policy and Practice.....</b>	<b>9</b>
<b>4. Conclusion.....</b>	<b>15</b>

## 1. Introduction

This paper uses the term ‘children and young people who are reported missing from home or care’. The term ‘going missing’ can infer that children and young people are making a choice and infers responsibility for the ‘problem’ onto those children and young people.

The available evidence base identifies that any child or young person who is reported missing from home or care could be at risk of being exploited or experiencing other harms.

This paper provides an overview of safeguarding concerns from current data collection and research including children and young people who are at higher risk of being reported missing, being exploited, or at risk of exploitation.

This paper explains current policy and practice in Wales that relate to these safeguarding concerns including how agencies respond when concerns are raised.

Due to the importance of safeguarding children and young people and the breadth of the safeguarding agenda, responsibility sits across more than one Ministerial portfolio.

## 2. What we know about the nature and scale of these safeguarding issues

### Data collection by the Police about missing persons

The UK Missing Persons Unit (UKMPU), within the National Crime Agency, collects and analyses data about missing persons (children and adults), in support of investigative and preventive operations by police forces within the United Kingdom.

The **most recent Written Report (2021/22)**<sup>1</sup> states that in relation to England and Wales, the total number of individual children who went missing was 63,866 and that 'children in care made up 24% of all children (individuals) who go missing, but account for 43% of all incidents involving missing children'. This means that 'on average, a child in care who went missing in 2021/22 would have done so on 5 occasions, compared to 2 occasions for a child not in care who went missing.'

In comparison to England, in the same period, Wales recorded 10,204 incidents, 3,249 of which relate to (individual) children and young people.

Of this figure 1,138 of these children and young people were in care at the time of being reported missing.

\*This average number of missing occasions cannot be calculated as North Wales Police did not provide data for this period)

\*Children and young people may have more than one incident of being reported missing so the information on individuals is more helpful.

### Data collection by local authorities on children who are reported missing in Wales

The **Social Services Performance and Improvement Framework** developed by Welsh Government in partnership with local authorities, has been able to collate and publish the total number of reports (incidents) and the total number of children (individuals) who go missing from care during the year, by local authority area. The All-Wales 2022/23 figures are as follows:<sup>2</sup>

	Total number of reports of children who go missing from care	Total number of children who go missing from care
2020-21	2,977	1,139
2021-22	3,744	1,422
2022-23	5,391	2,097

<sup>1</sup> 2021-22 UKMPU Written Report <https://missingpersons.police.uk/en-gb/resources/downloads/download/128>

<sup>2</sup> StatsWales – children who go missing from care during the year, by local authority <https://statswales.gov.wales/Catalogue/Health-and-Social-Care/Social-Services/social-services-performance-and-improvement-framework/children-and-families/childrens-safeguarding/childrenwhogomissingfromcareduringtheyear-local-authority>

From 2023-24, the **Children Receiving Care and Support (CRCS) census**<sup>3</sup> will also measure the number of times children and young people go missing during the collection year, exploring characteristics such as age, gender and ethnicity, which will provide additional context around who is being reported missing, and any patterns and trends that indicate vulnerabilities that we associate with groups that may be at higher risk.

Local authorities (under the Social Services Performance and Improvement Framework) and the CRCS census collect data on missing children who are looked after and/or receiving care and support, or support as carers from the local authority. Additional metrics captured by the CRCS census, include all children with a care and support plan who are:

- supported in their families or independently.
- looked after and in the care of or accommodated by a local authority.
- on the child protection register and are subjects of an inter-agency protection plan.

#### Notifications to Care Inspectorate Wales about children who are reported missing from care and those at risk of sexual or criminal exploitation

Regulation 60 and Schedule 3 of the Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017<sup>4</sup> require **providers of care home services for children** (children's homes) to notify Care Inspectorate Wales, the placing authority and their own local authority **when a child goes missing or has an unexplained absence**.

This includes, but is not limited to, where a child's location or reason for their absence is unknown and there is cause for concern for them because of their vulnerability or risk to self or others. The point at which the care home is concerned and will take action, including reporting the child missing to the police, will vary according to the child's individual risk assessment.

Providers must also notify Care Inspectorate Wales, the placing authority, their own local authority and the police of **any incident of child sexual exploitation (CSE) or child criminal exploitation (CCE), or where this is suspected**. This includes but is not limited to:

- where a child identified as at risk of CSE or CCE goes missing;
- where a child reports an incident that indicates they may be a victim of CSE or CCE; or
- where there is reason to believe a child may be subject to CSE or CCE.

---

<sup>3</sup> Wales Children Receiving Care and Support Census <https://www.gov.wales/wales-children-receiving-care-and-support-census>

<sup>4</sup> The Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017 <https://www.legislation.gov.uk/wsi/2017/1264/contents>

Data recorded by Care Inspectorate Wales on Regulation 60 notifications received for 2022/23 and 2023/24 are set out as follows:

Number of notifications from providers of care home services for children (1 April to 31 March each year).

Notification category	2022/23	2023/24
Missing or unexplained absence of a child at the service	1,950	2,629
Incident or suspected incident of child sexual or criminal exploitation	89	82

Regulation 40 and Schedule 3 of the Regulated Fostering Services (Services Providers and Responsible Individuals) (Wales) Regulations 2019<sup>5</sup> also requires **providers of fostering services** to notify Care Inspectorate Wales, the placing authority, their own local authority and the police of **any incident of child sexual (CSE) or criminal exploitation (CCE), or where this is suspected**. This includes but is not limited to where a child reports an incident that indicates they may be a victim of CSE or CCE, or where there is reason to believe a child may be subject to child exploitation.

#### Criminal exploitation of children and young people

Within the UK Government's National Referral Mechanism (NRM) framework, criminal exploitation is identified as one of four forms of modern slavery. This is alongside sexual exploitation, labour exploitation and domestic servitude.

The main legislation on criminal exploitation is the Modern Slavery Act 2015. The UK Government has committed through the 2024 King's Speech to "*strengthening the law to tackle those who exploit children for criminal purposes*"<sup>6</sup>.

People of all ages and backgrounds can become victims of criminal exploitation. Criminal exploitation of people under the age of 18 is designated as Child Criminal Exploitation (CCE) and defined by the UK Government as follows:

*"Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child*

---

<sup>5</sup> The Regulated Fostering Services (Service Providers and Responsible Individuals) (Wales) Regulations 2019 <https://www.legislation.gov.uk/wsi/2019/169/contents>

<sup>6</sup> Prime Minister's Office, The King's Speech 2024 [https://assets.publishing.service.gov.uk/media/6697f5c10808eaf43b50d18e/The\\_King\\_s\\_Speech\\_2024\\_background\\_briefing\\_notes.pdf](https://assets.publishing.service.gov.uk/media/6697f5c10808eaf43b50d18e/The_King_s_Speech_2024_background_briefing_notes.pdf) p. 57.

*Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.”<sup>7</sup>*

Home Office guidance describes CCE as including forced labour, forced theft, benefit fraud, acquisitive crime, drug cultivation and production, and ‘county lines’ cases.

Statistics published by the Home Office show the following number of referrals of potential child victims of modern slavery sent to police forces in Wales for investigation during 2023<sup>8</sup>:

Exploitation type	Male	Female	Other	Total
Criminal	214	13	0	227
Labour	23	1	0	24
Labour & criminal	11	1	0	12
Not specified or unknown	17	10	0	27
Sexual	5	36	1	42
Sexual & criminal	4	9	0	13
Sexual & labour	1	1	0	2
Sexual & Domestic Servitude	0	1	0	1

The UKMPU data is considered to be the most consistent data available as it uses the police definition of what constitutes a ‘missing’ episode. The national definition of a ‘Missing Person’ is ‘anyone whose whereabouts cannot be established and where the circumstances are out of character, or the context suggests the person may be subject of crime or risk of harm to themselves or another’.

Local authorities can view their data collection more frequently than the UKMPU data would be available, and this would support prompter responses in strategy and practice. The data collation of children who are looked after who are reported

<sup>7</sup> Home Office, Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland [https://assets.publishing.service.gov.uk/media/6659a22316cf36f4d63ebcc3/Modern+Slavery+Statutory+Guidance+\\_EW\\_+and+Non-Statutory+Guidance+\\_SNL\\_+v3.10.pdf](https://assets.publishing.service.gov.uk/media/6659a22316cf36f4d63ebcc3/Modern+Slavery+Statutory+Guidance+_EW_+and+Non-Statutory+Guidance+_SNL_+v3.10.pdf), p. 79.

<sup>8</sup> Home Office, Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2023: data tables <https://assets.publishing.service.gov.uk/media/65e1d2fd2f2b3b001c7cd847/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2023.ods>

missing enables local authorities to tailor their response to this high-risk group. The Census will enable local authorities to map wider trends and patterns amongst all children and young people who have an active care and support plan. Though their legal status may differ these are also children and young people who have potentially experienced abuse and/or neglect and/or trauma in their lives.

Data collected by Care Inspectorate Wales supports the identification of any patterns and trends relating to specific registered settings. This supports a prompter response to any concerns there may be about practice in a particular setting so that work can be done to support the setting to ensure their practices are keeping children safe.

### 3. Policy and Practice

It is widely recognised that the reasons children and young people are reported missing are “varied, complex and unique to individual children”<sup>9</sup>. For example:

- reacting to an event or change in their lives such as a change in family circumstances or a bereavement.
- problems at home (family home or home where they have been placed)
- may be unhappy about decisions/may not feel listened to.
- may go missing to areas where they have family or connections.
- may be experiencing neglect or abuse at home. They may also be encouraged or coerced to go missing by dangerous adults or by other children.

#### Groups identified as at increased risk.

There are some children whose circumstances mean they are at higher risk of going missing or being exploited. For example:

- looked after children are three times more likely to go missing than other children.
- children and young people in care who are placed outside their local area are at particular risk of going missing.
- unaccompanied asylum-seeking children could be at higher risk of exploitation.

(UKMPU data for England and Wales 2021/2022)

#### Transformation Programme for Children’s Social Services

The Welsh Government’s vision for children’s services is for more children to be supported to remain with their families with fewer children and young people entering care. We want the time that young people stay in care to be as short as possible, consistent with meeting the needs of the young person. We know that children who are placed outside of their local area are at greater risk of going missing. A key part of our vision is about ensuring that children who are in care can remain close to home so they can continue to be part of their community and support networks.

Understanding the lived experience of children and young people in care and how this impacts their lives is at the heart of everything that we have done and continue to do. That is why we have worked closely with Voices from Care Cymru to organise a series of Care Leavers Summits. These Summits have provided an

---

<sup>9</sup> <https://www.safeguarding.wales/en/chi-i/chi-i-c6/c6-p9/>

opportunity for Ministers to hear directly from children and young people about their experiences and their thoughts on what changes need to be made. We are working hard to deliver the commitments set out in the Care Experience Summit declaration, the first of its kind in the UK.

### Corporate Parenting

Our Corporate Parenting Charter publicly which launched in September 2023 is a good example of how we are working with a range of partners to support and improve outcomes for care experienced children and young people to have those life chances they deserve. The Charter is about taking a children's rights-based approach.

The Charter, which again has been developed with care experienced young people and partners, aims to drive consistency of approach across public bodies in Wales, improve engagement and raise standards of expectations of all who act as a corporate parent to the children and young people who are looked after and care leavers.

A communication and engagement programme is ongoing to encourage all organisations involved in the lives of care-experienced young people to sign up to the Charter and embrace its aims of supporting the welfare of all care-experienced young people.

### Eliminating Profit from the care of children looked after

The Welsh Government has also committed to eliminate private profit from the care of children who are looked after. Eliminating profit from care is about values and needs based provision, it is about fundamentally changing how services are provided to children and their families as part of a network of local, community-based services that safeguard and promote the welfare of the young person.

The changes we are seeking to make will ensure that public money invested in care home services for children and fostering services does not profit corporate entities, but instead is spent on children's services, to deliver better experiences and outcomes for young people; support service development and improvement; and further build professional development for those providing care.

They will enable local authorities to plan and secure appropriate care placements more effectively with children and young people more likely to be placed in environments that match their needs more closely. This will support the overall well-being and development of looked after children, leading to better social, educational, and health outcomes.

Placement stability for children and young people is critical and helps optimise an environment where they have the best chance to recover, develop, flourish and progress. There is a need to develop and expand the selection of high-quality placement options which best meet the wide ranging and complex needs of children to help ensure the right placement for each child is made at the start of their journey.

A more efficiently managed market will support this and reduce the need to place children far from their communities. By improving placement planning and capacity management, local authorities can make more placements available closer to the children's original communities thereby ensuring continuity and greater stability of placements.

### National Practice Framework

Work is also firmly underway to develop and deliver a National Practice Framework. We want the Framework to be the key foundation for how we work in Wales to ensure the best outcomes for our most vulnerable children, helping us achieve greater commonality and more seamless working at local, regional and national level, and provide families with the support they need as we transition to fitting services around people, not people around services.

### Support for Children in Care

Part 10 of the Social Services Wellbeing (Wales) Act 2014 imposes duties on local authorities in respect of statutory advocacy. All looked after children must be made aware of their entitlement to independent advocacy support and how they can access it. This entitlement is not just for when a looked after child or care leaver wishes to complain but includes situations where children or young people need to make representations about the quality of the care and support provided by the local authority.

Under Part 6 of the Act, a local authority must also consider whether it would be appropriate to appoint an independent visitor for a child they are looking after, taking into consideration factors such as whether the child is placed at a distance from home or out of the local authority area, whether the child experiences difficulties communicating or building positive relationships or whether they are likely to engage in behaviour which may put the child at risk of forming inappropriate relationships

Additionally, children and young people who are looked after will have review meetings at least twice each year that are chaired by an Independent Reviewing Officer (IRO) who will have had contact with the child or young person in between review meetings. The role of the IRO is to ensure the child/young person's rights are upheld, that their wishes and feelings are listened to and that agencies supporting the child/young person deliver support to meet their individual needs as set out in their care and support plan.

### Unaccompanied Asylum-Seeking children/Refugees

Welsh Government continues to take a 'child first, migrant second' approach to supporting unaccompanied asylum-seeking children and refugees and we expect Welsh partners to take the same approach. Local authorities are required by the Social Services and Well-being (Wales) Act 2014 to act in the best interests of and have due regard to the rights of the children they serve.

As part of the Programme for Government, Welsh Ministers are committed to continue to support and uphold the rights of unaccompanied asylum-seeking children and young people during this Senedd term. Unaccompanied asylum-seeking children were represented at the series of inaugural care experienced summits ensuring their voices are heard as part of the transformation of children's services.

UASCs in Wales are also supported through the Welsh Government-funded Asylum Rights Programme (ARP), which includes funding for TGP Cymru's Young Asylum Seekers and Refugees Programme. This is a partnership of organisations across Wales providing expert advice and support to people seeking asylum as they navigate the UK asylum system.

Welsh Government recognises that arriving alone within a foreign country can have a devastating and lasting impact on the lives of children and young people. It is vitally important that unaccompanied children who arrive in Wales are given access to the care and support they need to help them adjust to their new life here.

In Wales, we have an Independent Child Trafficking Guardianship (ICTG) service operating nationally across England and Wales since 2017 which supports trafficked children, however recently, we have seen a significant rise in the numbers of unaccompanied asylum-seeking children and there is therefore a greater need to look at whether a UASC Guardianship service is required specifically for Wales.

Moving forward we are committed to looking at the current support available for unaccompanied children and young people, and to exploring how a guardianship service could work in Wales, the resources needed to implement such a system and how it could complement the statutory services that are already available for UASC in Wales.

### Child Sexual Abuse including Child Sexual Exploitation

The Delivery Report for the first National Action Plan for Preventing and Responding to Child Sexual Abuse was published in November 2022. With a wide range of public and third sector partners we are now leading development of a second plan which will build on the tools and resources for families and practitioners created under the first plan.

Key actions are being matured to support the 3-year Delivery Plan. Each action will be designed to support Wales to achieve the overarching goals set out in partnership with our stakeholders. These will be directly informed by the recommendations of the Independent Inquiry into Child Sexual Abuse (IICSA) published in October 2023.

There are four strands to the Delivery Plan: prevention, protection, supporting children and young people (and their families), and supporting adult survivors.

We aim to publish the new Delivery Plan and National Strategy in 2025, alongside implementation and monitoring plans.

---

## Modern Slavery – Child Criminal Exploitation ('modern slavery by any other name')

As modern slavery is a reserved matter, the Welsh Government engages regularly with the UK Government on tackling exploitation and supporting survivors. The Welsh Government is a member of the Modern Slavery Engagement Forums organised by the Home Office. Welsh Government officials meet regularly with Home Office officials on various policy issues relating to modern slavery, including through quarterly meetings between the Home Office and the Devolved Governments.

The Wales Safeguarding Procedures detail the essential roles and responsibilities for practitioners to ensure that they safeguard children and adults who are at risk of abuse and neglect. The Wales Safeguarding Procedures are supported by the All Wales Practice Guides. This includes the Practice Guide on safeguarding children from Child Criminal Exploitation (CCE).<sup>10</sup> The Practice Guide recognises links to various intersecting safeguarding issues and risks. Other Practice Guides include safeguarding children who may be trafficked, safeguarding children from Child Sexual Exploitation (CSE), and safeguarding children who go missing from home or care.

Resources in Wales on CCE include the Complex Safeguarding Wales Practitioner Toolkit. This was developed by researchers at the Children's Social Care Research and Development Centre (CASCADE) at Cardiff University as part of a Health Care Research Wales-funded study into CCE in Wales.<sup>11</sup>

The Independent Child Trafficking Guardianship service has operated nationally in Wales since 2017 under a Home Office contract. The service is delivered by Barnardo's National Counter Trafficking Centre. The service provides both direct and indirect support to trafficked children, including children and young people who have been criminally exploited.

The Welsh Government organises the Anti-Slavery Wales Forum to bring together multi-agency partners to tackle modern slavery and support people with lived experience of exploitation. The Forum is supported by four thematic working groups. These are: prevention; support for survivors; training and awareness raising; and supply chains.

### All Wales Safeguarding Procedures

In Wales we have a central website for our safeguarding procedures for both children and young people and adults at risk.

---

<sup>10</sup> Social Care Wales, Safeguarding children from Child Criminal Exploitation (CCE) <<https://safeguarding.wales/en/chi-i/chi-i-c6/c6-p1/>>

<sup>11</sup> Cardiff University, Complex Safeguarding Wales <<https://www.cardiff.ac.uk/complex-safeguarding-wales>>

The procedures clearly set out what action must be taken by all agencies, (particularly children's services and police) in response to the identification of a child either experiencing abuse and/or neglect or at risk of being abused/neglected.

If a child/young person is identified as experiencing exploitation (criminal or sexual) children's services will arrange a strategy meeting with police and other agencies involved with the child and their family to consider what steps need to be taken to safeguard the child who has been reported and any other children who may be experiencing/at risk of abuse and/or neglect.

The procedures include a range of All Wales Practice Guides (to be read in conjunction with the procedures) relating to specific topics such as criminal exploitation which include sign posting to other resources that may assist practitioners from all agencies to identify and report concerns that will lead to earlier intervention in children's lives.

## 4. Conclusion

Welsh Government responsibility for safeguarding children and young people who are reported missing from care or home, at risk of, or being exploited either criminally or sexually, sits across several branches and two Ministerial portfolios.

Welsh Government commissioned research to assist in future policy formation about children and young people who are reported missing:

- A review of policy, procedures, and practice in responding to children who go missing from home or care.
- Stakeholder engagement with children, young people and their carers during Return Home Interviews.

Findings from the research reports have identified several key areas that need where further development is required, though it is acknowledged by the researchers that there are some limitations to this evidence base and wider consultation is required.

- Welsh Government is **establishing an internal policy advisory group** that will include representatives from policy areas that have a vested interest in this area to consider what we can do better or differently at a policy level.
- Welsh Government has **established a stakeholder group** to consider how we explore the issues raised in the research more widely with all key stakeholders. The inaugural meeting will be held before the end of September.
- The stakeholder group will also **consider the role of related Pan Wales/regional groups** that currently exist to share best practice.
- The stakeholder group will consider what is already known about **the provision of Return Home Interviews** and how these projects are funded currently.
- The stakeholder group will review examples of best practice in Wales.
- Using the evidence base gathered via consultation, the stakeholder group will **review and revise the All Wales Practice Guidance: Safeguarding Children who go Missing from Home or Care**.
- The stakeholder group will assist in **developing a targeted plan** which will be presented to the Minister for Social Care regarding any further actions. The estimated timescale for this will be **May 2025**.

There is considerable work ongoing in Wales to safeguard children and young people. However, it is acknowledged there is more work to be done.

## Children and Young People on the Margins Evidence Session

### NYAS Cymru Questions for Consideration

19<sup>th</sup> September 2024

1. In response to the Children, Young People and Education's Committee *'If not now, then when'* report in 2023, Welsh Government accepted recommendation 21 from the Committee which recommended for Welsh Government to: "respond to the concerns raised by NYAS Cymru in oral evidence on 15 February 2023, and by the Children's Society in their written response to our consultation, in relation to incidents of children missing from care. In doing so, it should set out clearly its expectations of local authorities, the police, and other statutory partners in their response to incidents of missing children, and its views on their calls for statutory return home interviews."
  - What steps have Welsh Government taken since accepting recommendation 21 to set out their clear expectations of local authorities, the police, and other statutory partners in their response to incidents of missing children?
2. In England, care-experienced children have a statutory right to the offer of an independent return interview after a missing incident. In the remainder of the current Programme of Government, will Welsh Government make the offer of an independent return interview a statutory right for care-experienced children in Wales?
3. Access to return interview services in Wales remain unequal, with not all regions commissioning independent return interview services. What is Welsh Government going to do to make sure all care-experienced children in Wales can access return interview services if they wish to?
4. Can Welsh Government provide an update on what it is doing to improve data collection and availability regarding children missing from care and children at risk of or victims of exploitation?
5. Do Welsh Government have a timeline for when they plan to update the All-Wales Practice Guides for safeguarding children missing from home or care?
6. Will Welsh Government create a national strategy to tackle the issue of child criminal exploitation in Wales, including the introduction of a statutory definition of child criminal exploitation and a funding plan to support intervention services?
7. Out of area placements often mean that children moved away from their friends, family and support network and as a result, they may 'go missing' to return to be among their

support network within their home local authorities. NYAS Cymru is concerned that the Part 1 of the Health and Social Care (Wales) Bill may result in more children being placed outside of their local areas and lead to an increase in missing incidents:

- What steps will Welsh Government to take ensure that there is not an increase of children moved out of area as a result of the introduction of the Bill?
- What steps will Welsh Government take to make sure there is not an increase in missing incidents amongst care-experienced children as a result of the Health and Social Care (Wales) Bill?
- Would Welsh Government consider making the offer of an independent return interview a statutory right under Part 1 of the Health and Social Care (Wales) Bill as a safeguarding tool to mitigate against any unintended negative consequences of the elimination of profit from children's social care?

# Agenda Item 3

By virtue of paragraph(s) vi of Standing Order 17.42

Document is Restricted

# Agenda Item 4.1

**Y Pwyllgor Plant, Pobl Ifanc  
ac Addysg**

**Children, Young People  
and Education Committee**

**Senedd Cymru**

Bae Caerdydd, Caerdydd, CF99 1SN  
SeneddPlant@senedd.cymru  
senedd.cymru/SeneddPlant  
0300 200 6565

**Welsh Parliament**

Cardiff Bay, Cardiff, CF99 1SN  
SeneddChildren@senedd.wales  
senedd.wales/SeneddChildren  
0300 200 6565

Jane Hutt MS

Cabinet Secretary for Culture, Social Justice, Trefnydd and Chief Whip

Dawn Bowden MS

Minister for Social Care

18 July 2024

## **Reducing the Criminalisation of care experienced children and young adults in Wales: A Practical Toolkit for Professionals & funding for Hillside Secure Children's Home**

Dear Jane and Dawn,

As you know, we are currently gathering evidence as part of our inquiry 'children and young people on the margins'. The inquiry is focusing on missing children and criminalised children and young people. More detail about our inquiry, including its terms of reference, can be found on [our web pages](#).

The Missing People toolkit

---

On Thursday 27 June I attended a meeting of the [Missing the Point](#) Steering Group, hosted by NYAS Cymru. During the meeting we spoke about the [Missing People toolkit](#), which was funded by the 4Cs, supported by Welsh Government, and jointly developed with Llamau and decriminalisation expert Claire Sands. The toolkit offers multi-agency professionals practical tools, resources and good practice examples to reduce criminalisation of care experienced children and young adults. I heard from a young person in care, her foster carer and different professionals around the table that the toolkit was an excellent resource.

It was very positive to hear that the Welsh Government has supported the development of the toolkit. But I was surprised to hear concerns from the Steering Group that the future of the toolkit is uncertain because the Welsh Government has not committed to provide a relatively small amount of annual funding to maintain it going forward.



I would be grateful for your assessment of what the toolkit has delivered to date and for an outline of what plans the Welsh Government has, if any, to provide recurrent funding in future.

#### Funding for Hillside Secure Children's Home

---

On Wednesday 10 July, we visited Hillside Secure Children's Home in Neath. As you will know, the children's home is generally funded by local authorities (in the case of children placed in the home under a secure accommodation order) and by the Youth Custody Service (YSC) (in the case of children in custody or sentenced to youth detention). Currently, more children at the home have been admitted on welfare grounds by the local authority than by the Youth Custody Service.

We heard that the UK Government has made significant investments to maintain capacity and expand provision in secure children's homes in England. Staff explained that secure children's homes in England receive commissioned provision from NHS England and the Department for Education *in addition to* any provision provided by the secure home itself to provide health and education services to children at the home. We were told that Hillside does not receive equivalent additional provision, and has to pay for health services from NHS Wales and education services from the local authority out of its own budget. We were told that this means that there are more financial resources available per child for secure children's homes in England than there are for children at Hillside.

We are concerned that it appears that vulnerable children attending Hillside – whether placed by a local authority or by the YSC - are financially disadvantaged compared to children who are placed in English secure children's homes.

Please could you:

- clarify the funding arrangements for Hillside Secure Children's Home (both revenue and capital), including in relation to funding for education and health services for children at the home;
- set out the relevant legislative provisions from which those funding arrangements originate; and
- set out your understanding of the differences in the funding and commissioning processes between Hillside secure children's home and equivalent homes in England and the reasons for that difference?

I would appreciate a response to this letter no later than Friday 30 August 2024.

Yours sincerely,



Buffy Williams MS  
Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

**Y Pwyllgor Plant, Pobl Ifanc  
ac Addysg**

**Children, Young People  
and Education Committee**

Sam Rowlands MS  
Temporary Chair of the Health and Social Care Committee

**Senedd Cymru**

Bae Caerdydd, Caerdydd, CF99 1SN  
SeneddPlant@senedd.cymru  
senedd.cymru/SeneddPlant  
0300 200 6565

**Welsh Parliament**

Cardiff Bay, Cardiff, CF99 1SN  
SeneddChildren@senedd.wales  
senedd.wales/SeneddChildren  
0300 200 6565

18 July 2024

## **Re. Health and Social Care (Wales) Bill**

Dear Sam,

Following my letter dated 20 June 2024, please see Annex A for our views on those provisions of the Health and Social Care (Wales) Bill ("the Bill") about which we have collected evidence over the course of the Sixth Senedd. I should highlight that any views we heard about the restriction of profit from the care of children looked after related to the plans in the public domain at the time (autumn 2022 to summer 2023) about the Welsh Government's policy intention.

In addition to our views outlined in Annex A on relevant provisions in the Bill, we believe that radical reform of the care system is needed in areas that are within the broad scope of the Bill, but are not currently addressed within it. The areas of policy set out in Annex B relate directly to either placements for looked after children and/or the regulation of the social care services and the social care workforce, and could therefore reasonably be considered to fall within the scope of the Bill. We believe that they should have been included in the Bill to give effect to the radical changes to the care system that care experienced children and young people and their families deserve.

I hope that you find our views useful as you come to conclusions about the Bill in your Stage 1 report.

Yours sincerely,



Buffy Williams MS  
Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg  
We welcome correspondence in Welsh or English



# Annex A: Our views on provisions within the Health and Social Care (Wales) Bill relevant to our work during the Sixth Senedd

## Chapter 1: Restrictions on profit in the provision of social care services to children

Restricting the making of profit in the provision of care home services provided wholly or mainly to children, secure accommodation services and fostering services (“restricted children’s services”)

---

Sections 2 to 9 of the Bill regulate social care services provided to children, including to:

- amend the Regulation and Inspection of Social Care (Wales) Act 2016 (“the 2016 Act”) to insert a new provision that defines the meaning of “restricted children’s services” for the purposes of restricting profit making by providers of children’s homes services, secure accommodation services and fostering services;
- amend the 2016 Act to set out new requirements for applications for registration in respect of restricted children’s services;
- make transitional arrangements for existing providers of a restricted children’s service (who were registered prior to the new ‘not-for-profit’ requirements).<sup>1</sup>

Our inquiry into radical reform for care experienced children and young people (“our 2023 inquiry”) did not consider in significant depth the Welsh Government’s intention to eliminate profit from the care of looked after children. Our work focussed on the separate Programme for Government commitment to “Explore radical reform of current services for children looked after and care leavers.”<sup>2</sup> However, even though it did not fall within the inquiry’s terms of reference, the commitment to “Eliminate private profit from the care of children looked after” was nevertheless frequently raised by the individuals and organisations that contributed to our inquiry.

We heard universal support for removing profit from children’s care, particularly from care experienced young people themselves.<sup>3</sup> Professionals, academics and organisations also widely supported the policy intention. However, they had significant concerns about how it could be implemented. We heard that changes to the social care market of the scale would require a

---

<sup>1</sup> Welsh Government, ‘[Health and Social Care \(Wales\) Bill \[AS INTRODUCED\]](#)’, 20 May 2024

<sup>2</sup> Welsh Government, ‘[Programme for Government – Update](#)’, January 2022, page 3

<sup>3</sup> [Written evidence, CEC 1.Voices From Care Cymru](#); Welsh Parliament, ‘[Children, Young People and education Committee: Engagement findings](#)’, March 2023, page 23

timeframe of 10 to 15 years to implement, and that removing profit-making placements before there are sufficient not-for-profit placements could make it even more challenging to find suitable placements for children.<sup>4</sup>

We concluded by supporting the *principle* of removing profit from the care of children. However, we noted that the evidence we received indicated that the 'eliminate' agenda may further reduce the sufficiency of placements in Wales in the short-term, as private providers withdraw placements without third sector or local authority placements being available to replace them. We urged the Welsh Government to pay close attention to the concerns raised to us by stakeholders, and to plan an implementation timetable accordingly.<sup>5</sup>

We note that according to the Explanatory Memorandum to the Bill, new providers registering with Care Inspectorate Wales will have to be a not-for-profit entity from 1 April 2026, and that all current for-profit providers be subject to transitional provisions from 1 April 2027.<sup>6</sup> We also note that the Bill places a duty on the Welsh Government to consult "any persons they think appropriate" about the length of the transitional arrangements for existing providers.<sup>7</sup>

**Conclusion 1.** Based on the evidence that we received, it is our view that a deadline of 1 April 2027 for existing for-profit providers to transition to not-for-profit providers would be wholly inadequate to fully mitigate all of the risks of placing all children in fully not-for-profit care placements. We welcome the provisions in section 4 of the Bill, which allows for transitional arrangements to be set out in regulations for current for-profit providers to transition to not-for-profit status. However, we are concerned that there is no fixed end date for those transitional arrangements. It is important for the sector at large - not to mention for children and young people in the care system, who have the right to know who is providing their care and whether they are profiting from doing so - to have clarity over the date by which profit will be removed from children's care. We therefore urge the Welsh Government to set out clearly an end date for the transitional arrangements, having first consulted fully and constructively with local authorities and other key stakeholders to ensure that a lack of not-for-profit placements does not push children into unsafe unregistered accommodation.

Placing children outside the placing local authority's area

---

<sup>4</sup> Welsh Parliament, '[Children, Young People and education Committee: Engagement findings](#)', March 2023, page 24; [Children, Young People and Education Committee, 2 February 2023, Record of Proceedings](#), paragraph 83; [Children, Young People and Education Committee, 17 November 2022, Record of Proceedings](#), paragraph 73; Welsh Parliament, '[Children, Young People and Education Committee: Findings of stakeholder events](#)', March 2023, page 14

<sup>5</sup> Welsh Parliament, '[Children, Young People and Education Committee: If not now, then when? Radical reform for care experienced children and young people](#)', May 2023, pages 107-108

<sup>6</sup> Welsh Government, '[Health and Social Care \(Wales\) Bill Explanatory Memorandum](#)', May 2024, page 148

<sup>7</sup> Welsh Government, '[Health and Social Care \(Wales\) Bill \[AS INTRODUCED\]](#)', 20 May 2024, para 1(4) of the new Schedule 1A in section 4



Section 10 amends section 75 of the Social Services and Well-being (Wales) Act 2014 (“the 2014 Act”) to specify that the local authority must take “all reasonable steps to secure” accommodation for looked after children, rather than “steps to secure, so far as reasonably practicable” as is currently the case under the 2014 Act. Subsection 1 requires that this accommodation is “within, or near to, the authority’s area” rather than the current requirement that it “is within the authority’s area”.<sup>8</sup>

The Explanatory Memorandum to the Bill as introduced explains the policy intention for this change:

*“This enables local authorities to make arrangements with other local authorities to develop new children’s homes and foster care placements. It acknowledges that there may be circumstances in which a child placed outside of the local authority’s area may be nearer to their home community than if they were placed in a different part of the local authority’s area.”<sup>9</sup>*

We support any legislative changes to allow local authorities to make the right decision for each child on an individual basis. We appreciate that placing children outside their local authority may be the right decision, for example if:

- The out of area placement is the nearest high-quality placement to the child’s home. During our 2023 inquiry we heard consistently from both children and professionals that children should be placed as near as possible to where the child was taken into care, unless there was a serious risk to the child’s safety to do so.<sup>10</sup> The Association of Directors of Social Service told us that “There’s not one children’s services department across Wales that will say that that isn’t an absolute priority [but that] Finding those placements is difficult.”<sup>11</sup>
- There are safety concerns for the child in their home authority. This might be because the child is at risk of abuse (emotional or otherwise) or exploitation.<sup>12</sup> In our current inquiry ‘children on the margins’, we are hearing regularly about children who are moved out of their home local authority (or even between England and Wales) to keep them away from criminal activity, or to protect them where there is an immediate risk to the child’s life.<sup>13</sup>

---

<sup>8</sup> Welsh Government, ‘[Health and Social Care \(Wales\) Bill \[AS INTRODUCED\]](#)’, 20 May 2024

<sup>9</sup> Welsh Government, ‘[Health and Social Care \(Wales\) Bill Explanatory Memorandum](#)’, May 2024, page 163

<sup>10</sup> [Written evidence, CEC 1 Voices From Care Cymru](#); [Written evidence, CEC39 Evidence from Children in Wales, with and on behalf of the National Children’s Charities Policy Group members](#); [Written evidence, CEC43 The Children’s Society](#)

<sup>11</sup> [Written evidence, CEC39 Evidence from Children in Wales, with and on behalf of the National Children’s Charities Policy Group members](#); [Written evidence, CEC 43 The Children’s Society](#)

<sup>12</sup> [Written evidence, CEC43 The Children’s Society](#); [Written evidence, CEC7 Foster Parent](#); [Written evidence, CEC1 Voices from Care Cymru](#)

<sup>13</sup> [Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\)](#). We have received other evidence from our stakeholder events and engagement visits. Summaries of the findings of these events will be published shortly.

However, reasons such as these are likely to apply to a small proportion of children. For the majority, out of area placements should be avoided wherever possible. In our 2023 inquiry, much of the evidence we received suggested that children were often placed far away from their home or previous placements not because it was in the child's best interests to do so, but because there weren't any quality placements in their local area.<sup>14</sup> During engagement work, one young person from Swansea told us that they had been put in a residential home in England. They had no support at all so far away from everyone they knew. They told us that they felt like "one of the forgotten."<sup>15</sup>

Whatever the reason for an out of area placement, and however far it is from the child's home community, poor multi-agency working and the failure to follow established reporting procedures can place any child in an out of area placement at risk of harm. The Children's Society set out detailed evidence explaining what local authorities must do if they place a child in another local authority area. This includes completing and sharing a Wales Out of Area Notification Protocol and a Child Information Form for each child, which sets out critically important information, including details of the child's social worker and any specific needs the child has, or risks relating to the child. The Children's Society concluded that:

*"The primary finding from the responses we received from local authorities was the lack of a consistent approach to information sharing when a child is placed in another local authority area, or the lack of information sharing at all. These practices mean that some children do not receive the care and support they need when they are placed in a care setting far away from their homes, thereby increasing the risk both of unsuccessful placements and children not receiving appropriate support if they face particular risks, such as abuse, exploitation, or a history of missing episodes."*<sup>16</sup>

Children in Wales, with and on behalf of the National Children's Charities Policy Group members, reminded us about the tragic consequences of failing to adequately fulfil sharing responsibilities. Their written submission reminded us that the child practice review following the death of Logan Mwangi found "deep rooted practice issues locally, including a lack of appropriate information sharing arrangements between agencies and poor professional confidence in reporting concerns."<sup>17</sup>

---

<sup>14</sup> [Children, Young People and Education Committee, 2 February 2023, Record of Proceedings](#), paragraphs 9 & 19-20; [Written evidence, CEC3 Individual: Written evidence, Care Inspectorate Wales \(additional information\)](#); Welsh Parliament, 'Children, Young People and education Committee: Engagement findings', March 2023, pages 23-25

<sup>15</sup> Welsh Parliament, 'Children, Young People and education Committee: Engagement findings', March 2023, page 23

<sup>16</sup> [Written evidence, CEC43 The Children's Society](#)

<sup>17</sup> [Written evidence, CEC39 Children in Wales, with and on behalf of the National Children's Charities Policy Group members](#)

**Conclusion 2.** We are concerned with how the provisions set out in section 10 will be interpreted and implemented, particularly in the context of the wider eliminate agenda, which we fear will put additional pressure on the number of available placements. We would have serious concerns if the provisions in section 10 lead to more children being placed outside their home area. The overwhelmingly pervading view across the evidence we have taken across both our 2023 inquiry and our current inquiry ‘children on the margins’ is that, for the majority of children, out of area placements increase the risk of children going missing, being criminalised or sexual exploited, not to mention making it more difficult to maintain relationships with their birth family or friends or avoid the need to move schools.

Even when it is the right decision to place a child in a different local authority, local authorities **must** consistently follow regulations and guidelines relating to information sharing to ensure that being in an out of area placement does not compromise the quality of safeguarding for any child.

### Placing children in unregistered accommodation

---

Section 13 sets out the ways in which looked after children are to be accommodated. The Explanatory Notes to the Bill state that a placement can be in “unregistered accommodation (on a temporary basis or in cases of urgency)”.<sup>18</sup> The mechanisms for placing children are set out in section 13(3), which inserts sections 81A to 81D into the 2014 Act.

- Section 81A(2) sets out that a local authority must place a child in what it believes to be the most appropriate placement. Section 81A(3) then sets out what a placement means in that context, including a placement with a local authority foster parent or in a children’s home.
- Section 81A(4) sets out that a local authority foster parent providing placements who is not a friend, relative or otherwise connected to the child must be “authorised”, and that children’s homes must be “registered”.
- However, 81B(1) and (2) set out that if a local authority believes that the most appropriate placement is with a local authority foster parent or a children’s home, but that the local authority cannot comply with the requirement for the placement to be authorised or registered respectively, they can apply to the Welsh Ministers for the placement to be approved. Such placements are known as “supplementary placements”. The information that must be included in such a request, and provisions relating to how the Welsh Ministers might respond, follow in sub-sections (3) to (8).

---

<sup>18</sup> Welsh Government, ‘[Health and Social Care \(Wales\) Bill Explanatory Memorandum](#)’, May 2024, page 165

New section 75D of the 2014 Act, to be inserted by section 12 of the Bill, provides that local authorities must report on the number of applications that they have made in that financial year for approval to place children in a “supplementary placement”.<sup>19</sup>

These newly inserted sections provide for a way by which local authorities can place a child with an unauthorised foster carer, or with an unregistered children’s home, with the approval of the Welsh Ministers. There is no timetable on the face of the Bill within which this approval must be given.

### **Our general concerns with the provisions relating to unregistered placements in the Bill**

In a letter to you dated 28 June 2024, the Minister for Social Services stated that:

*“The intention [of section 13] was to refer to accommodation where there is no requirement to register because the placement is not with a foster carer and the arrangements fall outside the definition of “a care home service”. There are a variety of circumstances where a local authority can decide to place a child in a setting other than foster care or a children’s home. The most common example of this is where a local authority places an older child aged 16 or 17 in supported accommodation as preparation for independent living.*

*We are aware that more recently usage of the terms “unregistered accommodation” and “unregulated accommodation” have tended to distinguish the two things, the term unregistered accommodation being used to refer to arrangements which fall within the scope of activity where there is a requirement to register but where the provider is not in fact registered and unregulated accommodation being used to refer to arrangements which fall outside the scope of regulated activity and therefore where registration is not required. That is not the sense in which “unregistered” is used here.”<sup>20</sup>*

However, section 13 makes no reference to accommodation “where there is no requirement to register” (quite the opposite: newly inserted section 81A(4) sets out explicitly that local authority foster carers should be authorised and that children’s homes should be registered). Neither does it refer at any point to children aged 16-17 specifically. Nor does it distinguish in any way between accommodation where registration/authorisation is required and when it is not.

At the time of writing, unregistered accommodation for children in care is illegal in Wales. During our 2023 inquiry, Care Inspectorate Wales set out that unregistered placements:

*“... are illegal and do not have the safeguards in place that come with registration. It is often the case local authorities are directly operating these services, redeploying*

---

<sup>19</sup> Welsh Government, ‘[Health and Social Care \(Wales\) Bill \[AS INTRODUCED\]](#)’, 20 May 2024

<sup>20</sup> ‘[Letter from the Minister for Social Care to the Chair of the Health and Social Care Committee](#)’, 28 June 2024, page 10

*their own staff or using agency workers. Accommodation includes Air B&Bs which we have seen result in multiple moves for children from one premises to another. At times these placements have been outside of the child's local area, and many are unable to meet their therapeutic and/or care needs. In each case CIW considers if the threshold for criminal investigation and prosecution is met, whilst recognising the local authority's duty of care to the child."*<sup>21</sup>

We also heard strongly worded concern about the use of unregistered placements in Wales, including from CAFCASS Cymru<sup>22</sup> and the Association of Directors of Social Services:

*"In 35 years in social care, I've never seen a position like this, and it's frightening... Nobody wants to do this, it is a last resort. The alternative is driving around with the child in the social worker's car."*<sup>23</sup>

We recommended that the Welsh Government and the Association of Directors of Social Services must jointly publish no later than December 2023 an action plan setting out how they will prevent the use of illegal, unregistered accommodation in Wales. In its response, the Welsh Government stated that it had established a local authority task and finish group to consider the issue of services operating without registration under its Eliminating Profit Programme Board, due to report late in 2023.<sup>24</sup> To date, we are not aware that a report by the group has been published. However, an October 2023 report by Care Inspectorate Wales about children's care homes operating without registration found that:

*"Whilst some children achieve positive outcomes in a temporary service which is operating without registration, some do not..."*

*Often the premises used for unregistered services and/or the standard of the arrangements made for children falls below those required for registration.*

*In many cases, staffing arrangements to provide care and support have been ad hoc and subject to frequent change. The deployment of staff who are not trained to meet the care and support needs of the child or young person and the over reliance on agency staff is of particular concern."*<sup>25</sup>

---

<sup>21</sup> [Written evidence, Care Inspectorate Wales \(additional information\)](#)

<sup>22</sup> [Written evidence, CEC 46 Cafcass Cymru](#)

<sup>23</sup> [Children, Young People and Education Committee, 9 March 2023, Record of Proceedings](#), paragraphs 69 & 71

<sup>24</sup> Welsh Government, ['Written Response by the Welsh Government to the report of the Children, Young People and Education Committee report entitled "If not now, then when? Radical reform for care-experienced children and young people"'](#), 5 July 2023, pages 16-17. Reference to the task and finish group is made here: Welsh Government, ['Removing profit from the care of children: update'](#), 20 November 2023

<sup>25</sup> Care Inspectorate Wales, ['Report on care homes for children operating without registration'](#), October 2023, page 5

## The use of Deprivation of Liberty Orders (DoLs) alongside unregistered placements

In our 2023 report 'If not now, then When?' ("our 2023 report"), we noted a link between shortages of secure accommodation and the increasing use of Deprivation of Liberty Orders (DoLs). The Right Honourable Sir Andrew McFarlane, President of the Family Division, told us that there is a "a lack, by a country mile, of provision for secure accommodation for young people" in England and Wales.<sup>26</sup> The Association of Directors of Social Services explained that local authorities may sometimes prefer a DoL to secure accommodation, because "At least using deprivation of liberties, you will keep children local, and you will keep them in an environment that possibly is more protected, rather than potentially going to secure accommodation in Durham."<sup>27</sup>

We fear that the practice of applying for a DoL for a child and placing them in unregistered accommodation may increase as a direct consequence of this Bill. A local authority can place a child subject to a DoL in residential care, but if a residential care placement is not available the local authority may have no choice but to place the child in unregistered accommodation.<sup>28</sup> We raise concern above that this Bill may result in additional shortages of residential care placements<sup>29</sup> as a result of the proposed profit-making restrictions, at least in the short-term. We are therefore concerned that enabling supplementary placements in unauthorised/unregistered settings under the new section 81B of the 2014 Act, against the backdrop of severe shortages of secure and residential accommodation, may lead to a significant rise in the use of DoLs in unregistered settings as local authorities struggle to place our most vulnerable children in secure accommodation or even in residential care homes.

**Conclusion 3.** We believe that the provisions set out in section 13 of the Bill would lead to an unacceptably high risk of an increased use of unregistered accommodation which would not provide the levels of care and support that children and young people in care deserve. We are deeply concerned about these new provisions, which provide a route for local authorities to place children in children's homes that are not registered with local authorities, or with foster parents who are not authorised by local authorities. We note the safeguards set out in the new sections 81B(3) to (8) of the 2014 Act, and the mandatory reporting arrangements in section 75D. But we are not convinced that these provisions mitigate the risks of normalising unregistered placements. Our concerns are compounded due to the likely short-term shortage of not-for-profit placements for children, as we

---

<sup>26</sup> [Children, Young People and Education Committee, 8 February 2023, Record of Proceedings](#), paragraph 149

<sup>27</sup> [Children, Young People and Education Committee, 9 March 2023, Record of Proceedings](#), paragraph 106

<sup>28</sup> Community Care, '[Courts to stop monitoring regulation of unregistered placements for children deprived of liberty](#)', 13 October 2023

<sup>29</sup> A recent BBC article found that three quarters of the 314 children's homes operating in Wales are run by private companies. See: BBC, '[Wales plans to remove profit from children's care](#)', 20 May 2024



set out above, which may lead local authorities to place even more children in unregistered accommodation, including an increasing number of children who have been deprived of their liberty.

## Annex B: Policy changes that we believe should be included in the Bill

### Children's social workers' caseloads

In our 2023 report, we concluded that:

*"... strengthening the social care workforce is key to reducing rates of children entering the care system, and improving the lives of those children for whom being in care is the right decision."<sup>30</sup>*

We came to this conclusion based on the numerous and consistent testimonies of young people themselves whose lives had been directly impacted by undercapacity within the social care workforce and the views of social work leaders, who told us directly that "The most radical reform that could be realised in this area is a reduction in workload for our social workers".<sup>31</sup>

We called on the Welsh Government to introduce legislation modelled on the Nurse Staffing Levels (Wales) Act 2016 to place a duty on local authorities to calculate safe and manageable maximum caseloads for different groups of social workers, and to take all reasonable steps to maintain those maximum caseloads. Alongside that proposed legislation, we recommended that the Welsh Government carry out a comprehensive workforce sufficiency plan, looking at routes into social work, and a nationalised approach to pay and conditions of social workers, like the approach that oversees teaching staff in Wales.

Our report stated clearly that "we are not calling for arbitrary legislative caps on caseloads", and it acknowledged that legislative reform would not, in and of itself, drive down social workers' workloads.<sup>32</sup>

The Welsh Government rejected this recommendation, arguing that "Complexity in cases varies considerably, and therefore it could be counterproductive to set a caseload maximum." Instead, it suggested that work carried out by Social Care Wales and others relating to workforce planning, and

---

<sup>30</sup> Welsh Parliament, 'Children, Young People and Education Committee: If not now, then when? Radical reform for care experienced children and young people', May 2023, page 36

<sup>31</sup> Written evidence, CEC 38 Association of Directors of Social Services (ADSS)

<sup>32</sup> Welsh Parliament, 'Children, Young People and Education Committee: If not now, then when? Radical reform for care experienced children and young people', May 2023, pages 36-37

by the WLGA relating to social work terms and conditions, would drive improvements to social care capacity.<sup>33</sup>

We note that your April 2024 report on the Nurse Staffing Levels (Wales) Act 2016 concluded that:

*"... the Act has strengthened workforce planning by highlighting where the gaps are in the current workforce and evidencing the number of nurses required to meet the needs of patients. But, in relation to ensuring a long-term, sustainable supply of nurses, there are so many factors that influence the recruitment and retention of nursing staff that legislation can only be a part of the solution, rather than the solution itself."<sup>34</sup>*

We believe that strengthening social care workforce planning across the 22 Welsh local authorities is reason enough in and of itself to take legislative action on social workers' caseloads. Alongside our associated recommendation for a comprehensive workforce sufficiency plan and a national approach to the pay and conditions of social workers, we believe that a legislative approach could also begin a journey towards safe, manageable caseloads for children's social workers. This would enable the relationship-focused social work that social workers themselves told us was so critical to driving down the rates of children entering the care system.

We are hearing throughout our current inquiry into 'children on the margins' across written evidence, our stakeholder events and our engagement work that social workers' caseloads are often too high to effectively support our most vulnerable children. Barnardo's wrote that:

*"As with all areas of the social care workforce at this time, there are endemic issues around recruitment and retention of staff which makes it incredibly difficult to ensure that children always have access to the same worker and can build a trusting relationship. Welsh Government should invest in ensuring that social work across the board is an attractive career option with a focus on retaining experienced and trusted staff. The sector is in crisis, with high caseloads, long waiting lists and low morale. We must tackle this entrenched issue to improve outcomes – both in terms of staff themselves and the way that we can support children, young people and families."<sup>35</sup>*

---

<sup>33</sup> Welsh Government, ['Written Response by the Welsh Government to the report of the Children, Young People and Education Committee report entitled "If not now, then when? Radical reform for care-experienced children and young people"'](#), 5 July 2023, page 2

<sup>34</sup> Welsh Parliament, ['Health and Social Care Committee, Nurse Staffing Levels \(Wales\) Act 2016: Post-legislative scrutiny'](#), April 2024

<sup>35</sup> [Written evidence, CYPM21 Barnardo's Cymru](#). See also: [Written evidence, CYPM30 Children's Legal Centre Wales](#). Social workers' caseloads has also been raised during informal evidence gathering; a summary of the findings of our stakeholder events and engagement visits will be published shortly.



**Conclusion 4.** We regret that the Welsh Government has taken no action in the Bill to address children’s social workers’ caseloads. We remained concerned that the work undertaken by Social Care Wales and others, such as ‘A Healthier Wales’ and its underlying delivery plans, though valuable, are unlikely to result in the radical reform that children, their families, and indeed social workers themselves deserve.<sup>36</sup>

## **Registration of foster carers and the creation of a national register of foster placements**

As you will know from your scrutiny of the Bill to date, sufficiency of placements for looked after children is a critical concern for the sector. In our 2023 report, we discussed shortages of high quality foster placements, residential care placements, and secure accommodation for young people, even putting aside the Welsh Government’s intention to restrict profit-making placements.<sup>37</sup> As of 31 March 2023, 68.7% of children looked after in Wales were in a foster placement (4,955 children), and so sufficiency of high-quality foster places is absolutely critical to meeting the needs of children in care across Wales.<sup>38</sup>

During our evidence gathering and since, we heard stories of children whose lives were transformed by the wonderful support they received from dedicated and loving foster carers. Sadly, we also heard heartbreaking stories of children who had been placed with foster carers who were not fit to look after children. Some young people told us that they had been sexually, emotionally and/or physically abused.<sup>39</sup>

The Fostering Network and others argued for a national register of foster carers as a way to get a better idea of how many foster carers we have across Wales, the number of placements they provide, where they are, and other relevant information. They also suggested that foster carers should be required to register with Social Care Wales, who would be the body responsible for holding and maintaining the proposed register. We were persuaded by the arguments put forward by the

---

<sup>36</sup> Social Care Wales data indicates that in March 2022, there were 6,736 social workers registered with Social Care Wales – an increase of 3% compared to March 2021. However, the social care workforce as a whole was 7% less in March 2022 than it was in March 2021. Also as of March 2022: the number of vacant social work posts had increased by 17% compared to 2021, and 12% of social workers were employed by an agency. In spring 2023, 77% of social workers say having too much work or not having enough time to do it causes stress at work, and 38% are dissatisfied with their current job. None of this data is broken down into adults’ services/children’s services social care workers. See: Social Care Wales, ‘[Social care workforce delivery plan 2024 to 2027](#)’, last updated 7 June 2024

<sup>37</sup> Welsh Parliament, ‘[Children, Young People and Education Committee: If not now, then when? Radical reform for care experienced children and young people](#)’, May 2023, pages 84–90, 95–96 and 102–103 respectively

<sup>38</sup> StatsWales, ‘[Children looked after at 31 March by local authority and placement type](#)’

<sup>39</sup> Welsh Parliament, ‘[Children, Young People and education Committee: Engagement findings](#)’, March 2023, page 23

Fostering Network, and recommended that the Welsh Government fund and deliver a national register of foster carers accordingly.<sup>40</sup>

Our recommendation was accepted in part by the Welsh Government, which committed to explore “what a national register could look like in Wales”.<sup>41</sup> Disappointingly, it is clear from the Fostering Network’s recent evidence to your Committee that the work is not progressing:

*“But we also know that we don't have a great deal of insight and knowledge as to where our foster carers are in Wales and who they are. In the radical reform inquiry, a register was put forward as a recommendation, and I would strongly urge that to ensure that this legislation does actually meet its full requirement that, alongside this, we expedite the opening up of a social care register for foster carers in order for them to ensure that they have that same level of status as social workers and residential care workers. Other parts of the sector have that via the provision of the register for them, and I think we have an urgent need to do that in Wales, and I'm very grateful that it was accepted as a recommendation by a previous committee. What we need to do now is actually expedite it, because it's been over a year since that recommendation was accepted, and we still don't seem to have a great deal of progress in relation to that.”<sup>42</sup>*

**Recommendation 1.** The Health and Social Care Committee should consider recommending to the Welsh Government that the Health and Social Care (Wales) Bill should be amended to make it mandatory for foster carers to register with Social Care Wales in order to provide foster placements for looked after children, thereby accelerating progress towards a national register of foster carers.

## Residential visiting advocacy

Residential visiting advocacy is where a residential home assigns an independent advocate to represent all the children at the home. The advocate will support the children by answering any questions they may have about their care, resolving disputes, and liaising with other advocacy services where required.

During our inquiry into services for care experienced children and young people, NYAS reminded us that advocacy in Wales – and indeed the establishment of the Children’s Commissioner for Wales –

---

<sup>40</sup> Welsh Parliament, ‘Children, Young People and Education Committee: If not now, then when? Radical reform for care experienced children and young people’, May 2023, pages 87-90

<sup>41</sup> Welsh Government, ‘Written Response by the Welsh Government to the report of the Children, Young People and Education Committee report entitled “If not now, then when? Radical reform for care-experienced children and young people”’, 5 July 2023, pages 12-13

<sup>42</sup> Health and Social Care Committee, 27 June 2024, Record of Proceedings, paragraph 18



came as a result of the North Wales child abuse scandal: a series of incidents of sexual and physical abuse across residential children's homes in Clwyd and Gwynedd.<sup>43</sup> As the Waterhouse Report set out, advocacy for children in residential care is particularly important because they can be much more vulnerable and isolated, and therefore at risk of harm or abuse.<sup>44</sup>

Our 2023 report noted that:

- The concept of advocacy (such as the statutory right that all Welsh-domiciled looked after children have access to an 'active offer' of issue based advocacy) is still not widely understood by those who own or work in private children's homes.
- Up 25% of children in residential homes were placed by English local authorities (and therefore do not have the right to an 'active offer' of advocacy like Welsh children do).
- At the time of writing, although all local authority run residential homes had assigned advocates, only 15% of private/voluntary residential homes did.

We concluded by recognising the benefits of an advocate who can take a broader overview of the residential home's care services as a whole, to reduce the risk of systematic abuses such as those that were investigated as part of the Waterhouse inquiry ever happening again.<sup>45</sup>

We recommended that the Welsh Government ensure that every child in a residential care home in Wales should have access to residential visiting advocacy by revising the arrangements in place under the Regulation and Inspection of Social Care (Wales) Act 2016 to make the provision of residential visiting advocacy in each and every children's home (by a contracted registered advocacy provider) a requirement for registration as a provider of children's care homes in Wales.<sup>46</sup>

The Welsh Government rejected this recommendation, arguing that the 'active offer' of advocacy is extended to children in residential settings, and that each child will also have an Independent Reviewing Officer to hold professionals and services to account.<sup>47</sup>

---

<sup>43</sup> [Children, Young People and Education Committee, 2 February 2023, Record of Proceedings](#), paragraph 142

<sup>44</sup> Waterhouse, Ronald et al, ['Lost in Care: Report of the Tribunal of Inquiry into the Abuse of Children in Care in the Former County Council Areas of Gwynedd and Clwyd since 1974'](#), February 2000

<sup>45</sup> Welsh Parliament, ['Children, Young People and Education Committee: If not now, then when? Radical reform for care experienced children and young people'](#), May 2023, pages 81-84

<sup>46</sup> Welsh Parliament, ['Children, Young People and Education Committee: If not now, then when? Radical reform for care experienced children and young people'](#), May 2023, pages 83-84

<sup>47</sup> Welsh Government, ['Written Response by the Welsh Government to the report of the Children, Young People and Education Committee report entitled "If not now, then when? Radical reform for care-experienced children and young people"'](#), 5 July 2023, pages 11-12

For the reasons so clearly set out in our report and summarised above, and despite the Welsh Government's response, we continue to believe that the current advocacy arrangements for children in residential care are insufficient. The Health and Social Care (Wales) Bill, which sets out new requirements for applications for registration in respect of restricted children's services, is an ideal legislative vehicle for our recommendations in this area to be taken forward. Residential care homes provided by the third sector will continue to be a key part of the residential care landscape in Wales under the Bill. As our report sets out, relatively few independent care homes have advocates, and staff working in independent care homes are not always as aware of children's advocacy rights as they should be.

**Recommendation 2.** The Health and Social Care Committee should consider recommending to the Welsh Government that the Health and Social Care (Wales) Bill should be amended to so that the provision of residential visiting advocacy for each and every children's care home is a requirement for registration as a provider of children's care homes in Wales.





## Free School Meals and no recourse to public funds in Wales – a briefing

Free School Meals (FSM) are available to eligible children attending a maintained school in Wales. Eligibility is based on household income, measured by receipt of certain benefits or asylum support, and the immigration status of a child's parents.

### Are Free School Meals a public fund for immigration purposes?

Immigration restrictions on public funds do not include FSM. Children of migrants not in receipt of asylum support but restricted from accessing public funds (most migrants without settled status), are not eligible for free school meals in Wales.

### What are our concerns?

Bevan Foundation research indicates that children in Wales are routinely excluded from accessing free school meals (FSM) by their parents' no recourse to public funds (NRPF) condition.<sup>1</sup> Restricting eligibility for FSM on the basis of a parent's immigration status results in indirect discrimination on the grounds of race.

- Children are going hungry while their peers are fed. Children with no recourse to public funds are not eligible for FSM in Wales even if their household income is zero.
- Restricted eligibility for free school meals does not depend on the immigration status of the child. It depends on the status of the parent.
- In a study of NRPF by the Unity Project in 2020, 90% of families responding had at least one British child, 95% of whom were black and minority ethnic children. None would be eligible for free school meals under current rules in Wales.<sup>2</sup>
- There are huge restrictions on support for children living in poverty who are subject to NRPF. Even child benefit is withheld. Free school meals are not a public fund and could be a valuable resource in tackling poverty where children have NRPF.
- Lack of access to FSM restricts access to the School Essentials Grant. Children with NRPF are eligible for this but usually cannot access it where not in receipt of FSM.
- In its NRPF Guidance, the Welsh Government urges local authorities to use their discretion not to charge children who have no recourse to public funds for FSM. Our research shows that this discretion simply is not working.

### Why doesn't discretion work?

Our research found that even where local authorities believe they are exercising discretion, because of the way in which information is shared and applications administered, many children from low-income households cannot access FSM:

- Local authority websites often do not include information re: discretionary provision.
- Application processes often require evidence of receipt of benefits to which people with NRPF are not entitled.

- Some local authorities think they are exercising discretion when they are in fact offering free school meals to children on asylum support or unaccompanied asylum-seeking children, who are already entitled to free school meals.
- Many parents with no recourse to public funds are afraid of accessing FSM in case they accidentally access a public fund and damage their immigration status. It is vital that FSM become a clear entitlement, not a discretionary support.

### Doesn't the universal primary roll-out of FSM address the issue?

The roll out of universal primary free school meals is a significant step in ensuring that no child in Wales goes hungry. It is not the whole journey. In secondary schools, beyond the universal roll out, many children of migrants are still missing out at lunchtime. Some families in our study spoke of the pain of knowing that one child was getting a meal at school, while an older child in secondary school, or a sibling attending a school in another authority, was going hungry.

### What is the situation in other parts of the UK?

In England, children with NRPF have been eligible for free school meals since 2020. At first this was an emergency Covid-19 measure. The UK government permanently extended eligibility under a policy change in March 2022. Eligibility is subject to maximum household income thresholds of between £22,700 p.a. to £34,800 p.a. In Northern Ireland and Scotland, children with NRPF are not eligible for FSM, though there is some council discretion.

### What needs to be done?

FSM are a vital tool in tackling child poverty and ensuring that no child goes hungry in school. We estimate that Welsh Government policy on FSM and NRPF restricts approximately 1,500 children in secondary schools from accessing free school meals they need, and consequently the School Essentials Grant.<sup>3</sup>

## **We are calling for the Welsh Government to permanently extend eligibility for free school meals to children with NRPF in Wales.**

This would bring eligibility for FSM in line with UK government provision in England and is the only way to protect children's rights, provide equitable access, and ensure that **no child** goes hungry in school.

---

<sup>1</sup> *What Am I Supposed to Do? Living with no recourse to public funds in the Nation of Sanctuary*, Bevan Foundation, 2024, <https://www.bevanfoundation.org/wp-content/uploads/2024/02/Living-with-NRPF-in-the-Nation-of-Sanctuary-V2-FINAL-REPORT.pdf>

<sup>2</sup> We include statistics on British children to highlight inequity, but we believe that **all children** have a right to food, regardless of their immigration status or that of their parents.

<sup>3</sup> Based on proportions likely to be living in poverty and attending secondary school of estimated nos. of children with NRPF or irregular migration status living in Wales (source figures from Migration Observatory and Dr. Jo Wilding). Rounded to nearest 100. Further information available on request.

# Agenda Item 4.4

**Y Pwyllgor Plant, Pobl Ifanc  
ac Addysg**

**Children, Young People  
and Education Committee**

Delyth Jewell MS

Chair, Culture, Communications, Welsh Language Sport, and International Relations Committee

05 August 2024

## **Welsh Language and Education (Wales) Bill**

Dear Delyth,

Thank you and your fellow Committee Members for joining us at our recent technical briefing on the Welsh Language and Education (Wales) Bill. Following this briefing on 17 July, we considered our approach to scrutiny of the Bill, and agreed to invite members of your Committee to participate in our Stage 1 scrutiny.

This invite is being issued under Standing Order 17.49 where, with the permission of a Chair, Members who are not members of a committee can participate in a committee meeting but may not vote. This is the same basis with which some of our Committee participated in your inquiry into "The legislative framework which supports Welsh-medium education provision".

Annex 1 details the likely meetings where we will be carrying out scrutiny of the Bill. Exact timings are yet to be confirmed, but we will share these details as soon as we have them.

Please let us know by Monday 9 September which of your Members, if any, intend to join us for some or all of our Stage 1 scrutiny. We will ensure that they receive all the relevant information ahead of the relevant Committee meetings.

**Senedd Cymru**

Bae Caerdydd, Caerdydd, CF99 1SN  
SeneddPlant@senedd.cymru  
senedd.cymru/SeneddPlant  
0300 200 6565

**Welsh Parliament**

Cardiff Bay, Cardiff, CF99 1SN  
SeneddChildren@senedd.wales  
senedd.wales/SeneddChildren  
0300 200 6565

Yours sincerely,



Buffy Williams MS

Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg

We welcome correspondence in Welsh or English



# Annex 1 – Committee Work Programme

<b>Thursday 19 September</b>	Public session: Oral evidence session 1: Member in Charge
<b>Thursday 26 September</b>	Public sessions: Oral evidence session 2 Oral evidence session 3 Oral evidence session 4 Oral evidence session 5
<b>Wednesday 2 October</b>	Public sessions: Oral evidence session 6 Oral evidence session 7 Oral evidence session 8
<b>Wednesday 9 October</b>	Public sessions: Oral evidence session 9 Oral evidence session 10 Oral evidence session 11 Oral evidence session 12
<b>Thursday 17 October</b>	Public sessions: Oral evidence session 13 Oral evidence session 14 Oral evidence session 15
<b>Thursday 24 October</b>	Public session: Oral evidence session 16: Member in Charge Private session: Key issues
<b>Thursday 28 November</b>	Private session: Consideration of draft report
<b>Wednesday 4 December</b>	Private session: Consideration of draft report
<b>Friday 13 December</b>	Stage 1 reporting deadline

# Agenda Item 4.5



**ABUHB response to:** Children, Young People and Education Committee - Inquiry into Children and Young People on the Margins

**Date:** 9<sup>th</sup> August 2024

**Response prepared by:** Joanne Foley, Principal Public Health Practitioner

**Approved by:** Tracy Daszkiewicz, Executive Director for Public Health & Strategic Partnerships

On behalf of Aneurin Bevan University Health Board (ABUHB), please accept our comments on Children, Young People and Education Committee - Inquiry into Children and Young People on the Margins. Contributions have been sought across ABUHB to inform the response to the questions posed.

***1. The scale and nature of children and young people presenting in accident and emergency departments with injuries that suggest they may be the victims of child criminal exploitation, and details of any specific strategies and/or projects that health boards are involved with in this regard.***

As of June 2024, there were 91 children open to the child exploitation team in Gwent Police. In terms of exploitation the health board receives the police cohort for both sexual and criminal exploitation bi-monthly for the for Local Authorities in Gwent. The safeguarding team collate a list of these children which is shared with A&E, CAMHS, sexual health and school health nursing. These services then add the necessary flags to children's record. For example, if a child on the exploitation cohort attends A&E, then there is a flag on their records to submit a duty to report to children's services.

We have seen a number of presentations with injuries to our hospitals including falls from motorbikes/electric scooters, drug and alcohol misuse and overdoses of prescription medication. Although these children are known to the exploitation arena, there is no evidence that these presentations a A&E are directly linked to exploitation as there are no disclosures made.

- 2. Presentations to sexual health clinics that indicate risks of involvement in child criminal activities. Details of any specific strategies and/or projects that health boards are involved with in this regard.*

The Directorate of Sexual and Reproductive Health have a safeguarding team in place. Safeguarding pathways and policies are accessible to staff on our internet site, as well as training regarding safeguarding issues. There is a dedicated SECS team who work with young people. ([Information for Young People - Aneurin Bevan University Health Board \(nhs.wales\)](http://nhs.wales))

When all under 18's attend sexual health services they are asked questions relating to safeguarding in the form of the CERQ/sexual exploitation risk assessment. (appendix A) this highlights if YP have been missing or at risk of CSE/ CCE. If people answer yes to anything with a red dot this highlights a referral to social services due to being high risk. If there are general concerns they are still refer to social services. The team also feed into corporate safeguarding CSE toolkit meetings.

As a service we have been involved in multiple multi agency projects involving safeguarding e.g. operation Quartz, missing children services. If a child is part of operation Quartz it is added to their notes so clinicians are aware when they come into clinic.

The service is part of the regional Multi-Agency Child Exploitation (MACE) meetings that provide oversight of child exploitation cases. The transition of these regional meetings from child sexual exploitation to child exploitation, as a broader theme, was an identified outcome indicator and enables the region to share intelligence on linked cases, locations of concern and case escalations.

- 3. Presentations to any other primary health care provision in respect of child criminal exploitation and missing children, alongside any recommendations you would like to see the Committee make in this regard.*

### **FCAMHS team (Forensic CAMHS)**

FCAMHS team (Forensic CAMHS) are a team of Senior Nurse (Mental health advisor to the 3 local management boards for the YOS/YJS services in Gwent) , Psychiatrist, Psychologist, and three clinical nurse specialists from CAMHS seconded into the youth offending services. The CNSs work in partnership with the YOS to meet the mental health needs of young

people who offend. The CNSs will meet for consultation with Youth Offending staff to discuss all young people who enter the Youth Justice system (both at risk of offending Preventions, and those who have a court disposal).

All young people are screened and those who are identified as requiring consultation which may lead to a mental health assessment, and a three tiered approach to mental health provision (Tier 1 consultation support and supervision of work, tier 2 systemic work with partner agencies at network consultation meetings, CLA meetings, Child protection, Formulation meetings etc or tier 3 1-1 work with young people) Any risks of criminal exploitation are identified by the YOS and /or CNS during their work and would be discussed for referral to NRM (national referral mechanism).

The team also sit on the National Referral Mechanism (NRM) panel that requires a representative from Health, Police and LA as decision makers. There is a small pool of staff within the health board that work across Safeguarding, substance misuse and Health that share the rota of attendance.

An example of a CNS current workload would be. A case load of 10-all of which would meet threshold for criminal exploitation concerns. 5 have a positive NRM, 8 have been through the exploitation toolkit. This is a typical indicator of our work in YOS/YJS. Missing person lists are shared with the CNS every morning.

A high number of young people being referred to YOS/YJS have exploitation concerns, therefore during lateral checks, or allocations panel weekly, health would identify and make recommendations as well as contribute to the care planning, intervention delivery and risk management.

We sit within Risk management panels probably 3x per week for our YOS/YJS's. This does include all exploitation thinking, planning and management. The missing bulletin often leads to strategy meetings or multi-agency meetings for a child that is repeatedly missing. We would be included in that or highlight the concerns via this notification. Additionally, we may sit on Resettlement meetings for our young people if they are moving counties or areas and exploitation needs, need to be addressed and planned for.

The rest of Forensic Team which consists of a Psychiatrist, Psychologist and a Senior Nurse work in a consultative way with the CAMHS service to provide forensic opinion, support and provide wider service provision and as part of our roles would be assessing for possible criminal exploitation. One example of this is our Harmful sexual Behaviour consultation service

which considers the role of grooming etc. We meet at mdt weekly to discuss YOS/YJS and CAMHS cases. We also meet monthly with the FACS service for an enhanced MDT for high risk cases. Again possible risk of criminal exploitation is considered.

The key to success in this work area is joint working across YOS/YJS.

**CAMHS Drug and alcohol Team (referred to as CAMHS DAT) which is part of Gwent NGAGE:**

All new referrals to Gwent NGAGE, have lateral checks completed by CAMHS DAT- for this information from Clinical workstation (this is HB case mgt system that reports hospital admission, referrals, letters, and physical test results) WCCIS- (health board case mgt system that covers mental health and learning disabilities). What we noticed from carrying out these checks, there were frequent hospital admission and intentional overdose (these would be followed up by CAMHS Liaison) and recreational overdoses- but with the latter no active offer of referral to local services was being promoted. From this, and with co-production with ABUHB Corporate safeguarding, CAMHS DAT proposed a recreational overdose pathway, where the 'Duty to report' (child protection referral) submitted by A&E staff due to the age and hospital presentation for recreational overdose/intoxication, would be sent to CAMHS DAT for:

- Lateral checks/triage
- Summary of Physical, psychological and exploitation concerns, which would be addressed alongside the drug/alcohol use
- Contact to the patient/family
- Active offer
- If declined- harm reduction advice and information, if accepted- ongoing work with drug and alcohol services or referral on to more appropriate services. As Youth offending team Drug and Alcohol workers are contracted from Barod and part of the Gwent NAGAGE suite of service delivery, this would include consultation with those colleagues.

As an example of referral number for work which also evidences the increased need, in Q1 23/24- we received 1 DTR and in Q1 24/25 we received 49 DTRS. A high proportion of these YP are known to CAMHS, CAMHS DAT, Child Exploitation and are locked after children.

lateral checks are core business for CAMHS DAT who are also piloting a trial period of representation at Monmouthshire Local Authority Child Exploitation Toolkit meetings, as it was identified-

- Consultation and referrals from local authority had significantly reduced since Covid, despite numerous service promotion events by Gwent NGAGE
- There are a number of YP open to Local authorities with CE concerns, drug and alcohol use and mental/physical health concern yet have declined referrals to services. This has resulted in social workers with high risk YP on caseloads with no CAMHS or CAMHS DAT input into the networks around the YP.

As such, representation at these meetings has increased communication with local authority, provided support the networks around the YP- adding to the value of appropriate risk assessment, and starting the process of conversation between the social worker and the young person around referral to drug and alcohol services, as well as providing both a CAMHS and Complex drug and Alcohol opinion by experienced Psychiatric Nurses to our colleagues, which has also improved referral rates.

CAMHS DAT are also part of the Gwent Multi-agency- child -exploitation meetings (MACE), which is led by Gwent police and attended by numerous professionals/services across Gwent. CAMHS DAT again, provide lateral checks for the YP involved in that locality and open to Operation Quartz (this is a huge task), from the lateral checks we can advise on trends, commonalities of presentation both present and previous.

This has identified pockets of substances in a particular area and resulted in a partnership approach for example- the significant rise in Aerosol use in Caerphilly for a particular young age group. This resulted in a bespoke training package for Professionals delivered by Barod, Trading standards visiting shops/supermarkets in the area and reminding storekeepers of the legal age for sale and increased CADRO officer awareness. CAMHS DAT worked with the referrals and professionals involved with the YP, to promote harm reduction messages, increase awareness of risk of imminent death from Aerosol use.

CAMHS DAT also provide Health representation into the Gwent National Referral Mechanisms for NRM consideration. Again, lateral checks inform the vulnerabilities of the YP as well as the evidence to support the decision maker, as an example YP that have been open to CAMHS DAT and undergoing an NRM referral, having the supportive relationship with the CAMHS DAT experienced psychiatric Nurse, allows for a greater depth of conversation which formed the evidence for a positive NRM decision.

## Appendix A – Extract from Child sexual exploitation risk assessment questionnaire

Does the young person have a disability / (e.g. learning or communication difficulty, physical disability) N.B. If yes, they are at 3-4 times greater risk of CSE	●
Under- 18 CSERQ (Child Sexual Exploitation Risk Assessment Questionnaire) completed. You must document reason for non-completion in notes	●
CSERQ-1 Have you ever stayed out overnight or longer without permission from your parents(s) or guardian? (Going Missing)	●
CSERQ-2 How old is your partner or the person(s) they are having sex with? Use whole number only e.g. 15,16,17 etc. If no current partner enter 0. If more than one partner use age of oldest	●
CSERQ-A For clients aged 16 and under, if age difference is 4 or more years then tick YES. For clients aged 17 years, if age difference is 6 or more years then tick 'YES' (Older Partner)	●
CSERQ-3 Does your partner stop you from doing things you want to do or, make you do things are not comfortable with? E.g. having sex with other people (Controlling relationship)	●
CSERQ-4 Thinking about where you go to hang out, or to have sex, are you or anyone else e.g. parent, guardian, friend, social worker, police worried about your safety? Think: where are they having sex? (Frequenting areas known for sexual exploitation)	●
CSERQ-5 Does anyone physically or sexually hurt you, or make you feel unsafe? N.B. this would include sexual assault/rape (Injury: are there signs of injury/ branding e.g. hand cutting, tattooing etc.?)	●
If answered 'YES' to ONE or more of the CSERQ1-5 questions this indicates that the child is at increased risk of child sexual exploitation. You MUST make a child protection referral	
CSERQ-6 Have you ever had a sexually transmitted infection?	●
Who do you live with? E.g. parent, guardian, sibling, other relative, foster care, residential care.	●
CSERQ-7 If the client lives with someone other than their parent or guardian, answer yes. N.B. living in residential care significantly increases risk of CSE - lower threshold for referral	
CSERQ-8 Does your parent/guardian or the person you live with have drug, alcohol and/or mental health problem?	●
CSERQ-9 Does anyone stop you from going out with/seeing, your friends or family?	●
CSERQ-10 Do you lack confidence or feel bad about yourself?	●
CSERQ-11 Have you ever felt the need to hurt yourself on purpose or to starve yourself to make you feel better in yourself?	●
CSERQ-12 Do you drink alcohol to get drunk?	●
CSERQ-13 Do you see anyone for counselling or have extra support with your school work?	●
CSERQ-14 Have you ever been excluded from school or stayed off school without permission?	●

# Agenda Item 4.6



Plismona  
yng Nghymru  
Policing in Wales



OFFICIAL - Swyddogol

## Policing in Wales Response to Children, Young people and Education Committee – Inquiry into Children and Young People on the Margins

### Introduction:

The Children, Young People and Education Committee have written to Policing in Wales via the chair to ask further questions to seek targeted written evidence from its key Policing stakeholders. They posed two questions for each OPCC and Police Force to respond to and the below is the Policing in Wales response to these questions from each force and OPCC.

### 1. **Strategic Direction:** How have you incorporated the issue of child criminal exploitation into your strategic direction for the Welsh police forces? What specific objectives have you set to address this issue?

#### Dyfed-Powys

**Dyfed-Powys OPCC and Police** state that there is a legal duty on all agencies, including the police, to safeguard and promote the welfare of children which includes sharing concerns at an early stage to encourage preventative action. The Wales Safeguarding Procedures detail the essential roles and responsibilities for practitioners to ensure that they safeguard children who are at risk of abuse and neglect.

**Dyfed-Powys OPCC and Police** are organisational partners of the regional safeguarding board ([CYSUR](#)). **Dyfed-Powys Police** alongside its partner agencies will protect children at risk of harm, abuse, and neglect in the following ways:

- Prevention or early help intervention to address any emerging concerns;
- Identification of concerns;
- Reporting these concerns to the Local Authority social services for the possibility of initiating section 47 enquiries under the Children Act 1989;
- Immediate protection to keep safe the individual at risk of harm;
- Provision of care and support to address unmet needs if the child is not found to be at risk or experiencing significant harm;

## OFFICIAL - Swyddogol

- Care and support protection to address needs including keeping the individual safe if the child is experiencing and/or likely to experience ongoing significant harm.

To ensure the effective safeguarding of children, **Dyfed-Powys Police**:

- Contributes to safeguarding and promoting the well-being of the child alongside its partner agencies by the sharing of information;
- Contributes to intra- and multi-disciplinary working in order to better understand the individual child and their circumstances and their needs for care, support and safety;
- Establish and maintain co-productive working relationships with the child at risk, their family and carers to establish what matters to them and to ensure they feel respected and informed.

**Dyfed-Powys Police** applies a trauma informed approach to all incidents requiring a child protection or early help response. This will include the assessment and documentation of child resilience factors to be shared with partners as part of the child's ongoing assessments. **Dyfed-Powys Police** recognises the impact of Adverse Childhood Experiences (ACEs).

## Gwent

Reducing the number of repeat victims of child criminal and sexual exploitation is a key commitment for **Gwent OPCC** and is listed in their current [police and crime plan 2021-25](#). Jointly through the Serious Violence Duty and working with our commissioned services, this has helped develop our approach to preventing serious violence with an emphasis on understanding youth violence, where it occurs and who is affected. This evidence base has helped shape interventions we offer to children and young people in Gwent.

**Gwent OPCC** commission several services aimed at targeting children and young people at risk of exploitation. These services range from early awareness raising to 1:1 intervention for those most at need. For example, our commissioned services include St Giles Trust which uniquely provides lived experience mentoring support to young people and families at risk of CCE, CSE and serious organised crime. It also covers referrals made for young people known to be involved in knife crime or a pre-meditated serious assault. Quarterly evaluation reports are received from the trust which gives real insight and data around child criminal exploitation and youth violence. This enables interventions to be adapted and changed where necessary to produce positive outcomes. In terms of prevention **Gwent OPCC** has commissioned Crime Stoppers Fearless to provide schools and youth groups with workshops on topics such as County Lines, helping to spot the signs of the grooming and recruitment process, and understanding the impact and harm caused.

Through Positive Futures **Gwent OPCC** is helping support young people throughout Gwent using sport to engage them in positive interactions with qualified staff who are trained in trauma informed strength-based approaches. It is an open access provision with staff working in some of the most deprived areas in Wales helping young people often at risk of criminal exploitation.

## OFFICIAL - Swyddogol

Working together with their commissioned services and **Gwent Police**, the **OPCC** take a collaborative approach to tackling this problem.

Due to the severity and often hidden nature of these crimes, **Gwent OPCC** note it is vital to work closely with partners to identify and respond to both victims and offenders. Collectively with their partners they adopt a strategic approach to ensure decisive action is taken that gets to the root causes of these crimes and prevents further harm.

In Gwent for several years we have been focused on gaining an evidence base of children and young people on the brink of criminal exploitation/displaying vulnerabilities. In 2020, the **Gwent OPCC** [traced the service histories and life experiences of a cohort of 13 children in Newport who had the highest number of recorded offences in the 2018/19 financial year](#). The information required for the research was gathered through multi-agency collaboration. The research consisted of a mapping exercise that revealed many missed opportunities for services to intervene earlier. This meant that the challenges experienced by children escalated before they could be addressed and so became more complex.

From the initial research and findings from the project, **Gwent OPCC** are currently carrying out an evaluation. The report will highlight key findings and offer up any recommendations and consider whether this should be embedded in existing school/agency structures.

The force continues to reassure the **OPCC** that work collaboratively is ongoing to target those perpetrating these offences, to prevent and disrupt offenders. Regular MACE Multi-Agency Child Exploitation meetings with partners internal and external are continuously improving to identify, detect and disrupt risks to children and young people in the community.

**Gwent Police** also state that each of the Welsh forces have incorporated the issue of child exploitation into their force strategic plans. Each has a strategic governance and within **Gwent Police** child criminal and sexual exploitation forms part of the force control strategy. It is also embedded within the regional strategic direction as a designated regional threat within Tarian (tri-force Regional Organised Crime Unit (ROCU)) and has a standalone Regional Threat Groups specific to Child Sexual Abuse and Exploitation (CSAE), Modern Slavery (MDS), Organise Immigration and Drugs which also ensures that the issue of child criminal exploitation is captured regionally. It also recognises the multi-faceted dynamic of serious and organised crime and the intrinsic links that this has to child criminal exploitation.

One of **Gwent Police's** strategic objectives is to protect the most vulnerable in society. Within the [2021 - 2025 Policing plan](#), this includes reducing the number of repeat victims of criminal and sexual exploitation by increasing the detection of hidden and under-reported crimes such as child criminal exploitation. There is a specific policy relating to all elements of child exploitation and covers policy and procedure for both Child Sexual Exploitation and Child Criminal Exploitation. There is acknowledgement that these crime types are often inter-connected. **Gwent Police** is developing a problem profile to look at the specific issues of child exploitation but to ensure that the organisation fully understands the issues faced by children and young people who are at risk of criminal exploitation and how they can better combat this problem. There the ROCU links directly with forces and undertakes a regional overview and has completed a regional problem profile to provide a regional specific and assist forces in

highlighting themes and set specific thematic objectives based on regional and national intelligence and themes.

In order to ensure that there is accountability across all partner agencies, **Gwent Police** are leading on Multi-Agency Child Exploitation (MACE) and Missing Children to identify and co-ordinate any local themes identified and ensure that these are tackled in an expedient manner by all agencies with a statutory obligation to safeguard children and young people. **Gwent Police** has developed a Child Protection Delivery Plan which specifically includes missing children and child exploitation as areas to develop good practice and embed these into teams across the organisation. This aligns to national guidance and authorised professional practice (APP). The force also links with the National Police Chiefs Council (NPCC) and Vulnerability Knowledge and Practice Programme (VKPP) amongst others to ensure that the strategic direction adapts to changes in types of exploitation of children.

## North Wales

**North Wales OPCC** provided an update on what their Serious Violence team does to tackle child criminal exploitation they also provided a series of documents with further examples of the work to tackle this issue and the resourcing behind it which can be attached with this response.

The Serious Violence lead said this issue is a top priority for all specified authorities in North Wales. Their extensive consultations, including the Strategic Needs Assessment (SNA), Strategy, and Mapping of Interventions, have revealed inconsistencies and gaps in existing efforts. For 2024-25, all specified authorities have agreed that prevention is the most critical need. The funding that they have utilised to support projects has been devolved to all the Community Safety Partnerships across North Wales who have utilised the SNA and Strategy together with the criteria in which to base their decisions on what projects are supported. This was a limited amount of funding for North Wales and for short term projects which have been listed in the separate documents.

Furthermore, they conducted a professionals and young people survey to gather insights into those children directly affected. This analysis, combined with their strategy, informed the criteria for projects aimed at supporting young people.

Notably, their analysis showed higher school exclusion rates in North Wales compared to the Welsh average. They have responded by developing projects to address this, but they have observed inconsistencies in approaches across local authorities. Unlike England, where legislation mandates specific actions, they rely heavily on collaboration and partnership. All stakeholders recognise the importance of this joint effort in tackling serious violence, and there is still much work to be done.

While the landscape is complex, the lead does believe the duty has been instrumental in mandating collaboration and ensuring a community-wide approach that goes beyond policing alone.

## OFFICIAL - Swyddogol

**North Wales Police's** vision is to be the safest place to live, work and visit in the UK. Their Force strategic plan 2023-2026 sets out their plan centred around their priorities of:

- Being visible and engaging with their communities
- Focusing on the basics of fighting, preventing, and reducing crime
- Providing an excellent service to victims.

Underpinning their priorities are their five key areas of focus which are required to support their successful delivery for the communities they serve.

- Their people
- Partnerships
- Prevention
- Continuous improvement
- Value for money

**North Wales Police** has a vulnerability strategy. They are aware that a National Vulnerability Strategy is to be released imminently. Once published, they will seek to adopt the National Vulnerability Strategy and review their plans to ensure consistency. Their Protect Vulnerable People Unit (PVPU) has a strategic control strategy and tactical action plan for child protection incorporating CSAE which is framed in line with the National Vulnerability Action Plan (NVAP) 7 themes.

Their CSAE strategic objective is: "To prevent incidents of child abuse and harm, through prosecution, disruption and education, whilst ensuring victims can access help and support with ease." The actions within the tactical action plan in support of the strategic objective are taken from identified national good practice, guidelines, recommendations from peer reviews and HMICFRS Inspections so that there is a focus on continuous development. A Detective Inspector within PVPU leads on the CP Portfolio and ensuring its progression.

## South Wales

The **PCC** and **South Wales OPCC** will be working with partners across Wales and in particular with Policing and Welsh Government, as well as UK Government to ensure that tackling child criminal exploitation is a priority for all. Far too many young people are being exploited and the **OPCC** need to take the opportunity to address this. Work to develop the Police and Crime Plan is currently underway, with a commitment to prioritise community engagement within this development and to give due focus to prevention.

In November 2023, Action for Children launched the [Jay Review of Criminally Exploited Children](#) to gather evidence from expert witnesses on the scale and nature of the criminal exploitation of children, the legal and policy response across the UK and the support available to victims. The

## OFFICIAL - Swyddogol

Violence Prevention Unit (VPU) team gave evidence as part of the review, and the review panel concluded that a new system is required, designed with the explicit purpose of tackling the criminal exploitation of children. The Head of the Violence Prevention Unit will be working with Action for Children to explore the opportunities to take on board their recommendations for a new system.

The Wales Without Violence Framework plays a key role in the strategic direction for the **OPCC** and VPU and outlines key elements needed to successfully develop primary prevention and early intervention strategies to end violence among children and young people through a public health, whole-system approach, aiming to address risk factors and encourage protective factors among children and young people.

**South Wales Police's** policing purpose is to pursue criminals, prioritise victims and protect vulnerable people, delivered through the [Chief Constables Delivery Plan \(CCDP\) 2021-2025](#). The operational pillar of the CCDP has objectives focused on preventing harm from serious and organised crime, focus on victims, and protection from exploitation, specifically taking an early intervention and preventative approach with partners to tackling child exploitation and abuse, both physical and online.

Year on year utilising the Management of Risk in Law Enforcement (MoRiLE) methodology, child criminal exploitation, (alongside child sexual exploitation) has featured in the top 10 of identified risks to the organisation, this resulting in a dedicated control strategy to better understand the risks presented and plan to mitigate them, through prevention, use of intelligence, enforcement activity, and public reassurance. More broadly in 2024, the control strategy has become one of Child Protection due to the intrinsic links between missing from home incidents, sexual and criminal exploitation, partnership safeguarding arrangements and the desire not to unnecessarily criminalise children. The control strategy is supported by a Child Protection Delivery Plan.

A child sexual and criminal exploitation problem profile was published in 2023 in support of the creation of dedicated child exploitation investigation teams. A wider child protection problem profile was commissioned in the autumn of 2023 where the findings have been utilised to understand the scale of risk to children and young people through good quality data (including protected characteristics) and enhancement of the capability and capacity to meet demand.

In addition to the guidance and support provided through the College of Policing Authorised Professional Practice (APP), and the Vulnerability Knowledge and Practice Programme (VKPP), they also have a 'Child Protection and Safeguarding Children and Young People policy' which directs officers responses and includes safeguarding and investigative advice for cases of child criminal and sexual exploitation.

The link between children missing from home and exploitation (criminal or sexual) and the shared responsibility of all partner agencies was highlighted in the Missing Children Summit hosted by South Wales Police in April 2024. The multi-agency summit provided the platform to share the collective challenges faced across agencies and resulted in them pledging to work together to safeguard those at greatest risk. The event also highlighted the 'Not for Profit' concerns emanating from the Health and Social Care (Wales) Bill 2024, to eliminate profit from

private care settings, with the aspirational timescales presenting an increased risk to children looked after and their susceptibility to exploitation.

## 2. **Resource Allocation:** How are resources allocated to tackle child criminal exploitation? Are there any specific funding or resources that have been particularly helpful in supporting the work of frontline officers and investigative teams?

### Dyfed-Powys

In relation to the resource allocation, **Dyfed-Powys Police** has an exploitation desk in the Vulnerability Hub who assist with the strategic direction of the organisation but also operationally by overseeing the review of nominals via regular divisional meetings, including the Force's Intelligence Bureau. In relation to resulting criminal investigations, these are adopted by existing structures within the Force. **Dyfed-Powys Police** does not have divisional teams dedicated solely to criminal exploitations. **Dyfed-Powys Police** has a partnership integrated triage trial currently underway in Pembrokeshire, which aims to prevent and reduce harm and exploitation of children with a more targeted approach to early help across all agencies. There is early indication that this trial is successful and there are plans to evaluate and potentially consider the continuation and expansion of this approach more widely across the Dyfed-Powys region.

Dyfed-Powys' PEEL Assessment can be viewed here:

#### **PEEL 2023–25 - An inspection of Dyfed-Powys Police - November 2023**

- [Report](#)
- [Response](#)

For further context, some thematic inspections for which the PCC has responded to recently:

#### **Joint Inspection of the Multi Agency response to abuse and neglect of children in Powys - February 2024:**

- [Report](#)
- [Response](#)

#### **Group Based Child Sexual Exploitation - December 2023**

- [Report](#)
- [Response](#)

**An inspection of how well the police and National Crime Agency (NCA) tackle the online sexual abuse and exploitation of children - May 2023**

## OFFICIAL - Swyddogol

- [Report](#)
- [Response](#)

**Dyfed-Powys Police** has a child protection problem profile. In May, through the Force's Vulnerability Portfolio Performance Report, there was a spotlight on child sexual abuse and exploitation. These documents are not available to share widely, but the **OPCC** has had sight through work where the PCC holds the Chief to account.

**Dyfed-Powys Police** has a robust Exploitation Policy, Vulnerability Policy and a Child Abuse and Child Protection Policy. The force also has a workflow detailing the response to reports of Child Exploitation.

**Dyfed-Powys Police** follows a number of national policies and procedures.

- [Cysur | National Policies & Procedures](#) – a list is provided within the Regional Safeguarding Board. This is in the public domain.
- [Child exploitation disruption toolkit \(publishing.service.gov.uk\)](#)- Home Office Disruption Toolkit. This is in the public domain.
- <https://www.app.college.police.uk/app-content/major-investigation-and-public-protection/child-sexual-exploitation/#legislation-and-the-law>- College of Policing Authorised Professional Practice - this is in the public domain.

CYSUR – regional safeguarding board, attended by both **Dyfed-Powys Police and OPCC**. This is not an exhaustive list (full list can be seen on the CYSUR website):

- <https://cysur.wales/media/tr3denpk/mawwsb-multi-agency-child-exploitation-meeting-terms-of-reference.pdf> Regional guidance on Multi-Agency Child Exploitation meetings. This is in the public domain.
- <https://cysur.wales/media/a4lberr4/child-exploitation-strategy-document.pdf> Regional CE Strategy. This is in the public domain.
- <https://cysur.wales/media/qmfbknr1/child-and-adolescent-young-person-vulnerability-guidance-on-the-use-of-appropriate-language.pdf> Regional guide to support staff, practitioners, professionals and partner agencies working with children, young adults and families and the community to use appropriate language with specific reference to Child Sexual Exploitation (CSE) and Child Criminal Exploitation. This is in the public domain.
- <https://cysur.wales/media/kagnhfoy/mawwsb-reducing-the-unnecessary-criminalisation-of-care-experienced-children-and-young-adults-practice.pdf> Reducing the unnecessary criminalisation, regional document. This is in the public domain. This directly relates to [All Wales Protocol \(gov.wales\)](#), which sets the expectations for practice across agencies to reduce the unnecessary criminalisation of care experienced

## OFFICIAL - Swyddogol

children (up to the age of 18) and young adults (up to the age of 25). This is in the public domain.

- [Working Together to Safeguard People \(gov.wales\)](https://gov.wales)- Wales Safeguarding CSE Guidance. This is in the public domain.

### School Police Service

In the year ending 31 March 2023, **Dyfed-Powys Police** was active in 318 schools across its area, reaching more than 83,000 children through the all-Wales School Police Programme. Due to a change in funding arrangements from Welsh Government, **Dyfed-Powys Police** is now working to provide a similar service within the Dyfed-Powys area. The force has invested in specially trained school-based officers who provide schools, children and young people with up-to-date information about a range of topics including: the dangers of substance use and misuse; county lines; domestic abuse; exploitation; bullying; antisocial behaviour; internet safety; weapons; radicalisation; and community cohesion.

Work on a three-year Force review is underway (within second year of the review). Service demands continue to grow and become increasingly complex. The Force continues to experience year-on-year increases in recorded crime, with incidents involving mental ill-health and more complex inquiries into child sexual exploitation and cybercrime. Changes to the way that crimes are recorded nationally have impacted on published crime levels and account for some of the increase. Work continues to improve crime data integrity and the Force's focus on vulnerability over the last year has realised a positive increase in the reporting and recording of crimes. Current demand challenges impacting workforce capacity and capability include:

- Increasing demand on Force Control Centre resource;
- Response Officer levels across each Local Policing Area;
- Crime and Incident Hub work and impact on resources;
- Neighbourhood Policing Teams;
- Crime Investigation and Recording linked to new crime types such as stalking and harassment, and changes in recording practices;
- Shortage of PIP2 accredited Detective Constables;
- Analytical capacity - increasing demand for analysis and reporting;
- Project Management capacity - increasing requests for project assistance.

Detail on the financial landscape of **Dyfed-Powys and OPCC** can be seen in the precept and medium term financial plan: [https://www.dyfedpowys-pcc.org.uk/media/mjmbmvk/precept-and-medium-term-financial-plan\\_english.pdf](https://www.dyfedpowys-pcc.org.uk/media/mjmbmvk/precept-and-medium-term-financial-plan_english.pdf)

## INTACT

The force's INTACT team works with young people identified as being at risk of committing, or becoming a victim of, serious violent or organised crime. Over the last 2 years, the INTACT team has offered targeted interventions to more than 600 children, young people and vulnerable adults. This includes boxing clubs and other diversionary schemes. The force has estimated that 72 percent of the people who took part in INTACT diversionary schemes had no further police contact for at least 3 months afterwards.

In 2022, the INTACT team received a safeguarding practice award. This was evaluated by Aberystwyth University, and was included in an 'In Focus' APCC innovative practice circulation: [In Focus: Innovative and Effective Approaches to Tackling Serious Violence \(apccs.police.uk\)](https://apccs.police.uk/).

## Police and Crime Plan

[policy-and-crime-plan-2021-2025.pdf \(dyfedpowys-pcc.org.uk\)](https://dyfedpowys-pcc.org.uk/policy-and-crime-plan-2021-2025.pdf)

The Police and Crime Plan sets the strategic direction, which includes Serious Organised Crime and Exploitation. The PCC has committed in his plan to invest in services that support children as victims and prevent or reduce their risk of exploitation.

The **PCC and OPCC** works with his Youth Ambassadors on topics that they raise as challenges within their communities – there are plans for the Youth Ambassadors to hold the Chief Constable to account at an extraordinary Policing Board meeting in September, where they will represent the children and young people within their communities.

The **PCC** has commissioned an independent debriefing, support and mediation service for children and young people who have been reported as 'missing' and at risk of sexual exploitation or victimisation: [Dyfed-Powys Police & Crime Commissioner \(dyfedpowys-pcc.org.uk\)](https://dyfedpowys-pcc.org.uk/).

The **PCC** has provided some funding to organisations and partners in line with the Police and Crime plan to support efforts to reduce risk of exploitation. Decision logs are available on the website: [Dyfed-Powys Police & Crime Commissioner \(dyfedpowys-pcc.org.uk\)](https://dyfedpowys-pcc.org.uk/)

The **PCC and OPCC** is committed to early intervention and prevention, and has become a Wales PCC joint children and young people portfolio lead recently.

The **PCC and OPCC** is committed to being trauma-informed and ACE-aware.

The **PCC and OPCC** have a strong working relationship with youth justice partners who inform on trends and cases within the area, supporting the PCC in his duties to hold the Chief to account.

## Policing Board

The Policing Board is where PCC Llywelyn holds Chief Constable Dr Richard Lewis to account. Minutes and agendas can be viewed here: [Dyfed-Powys Police & Crime Commissioner \(dyfedpowys-pcc.org.uk\)](https://dyfedpowys-pcc.org.uk/).

## OFFICIAL - Swyddogol

Some recent meetings where related topics have been discussed:

- **24<sup>th</sup> February – Related Meeting Topics Discussed:** Group-based child sexual exploitation.
- **14<sup>th</sup> March – Related Meeting Topics Discussed:** Joint inspection of the multi-agency response to abuse and neglect of children in Powys.
- **11<sup>th</sup> of June – Related Meeting Topics Discussed:** Child sexual exploitation; All-Wales Protocol for reducing criminalisation of care experienced children & young adults; Secure accommodation for children; Outcome 22 and disproportionality within youth justice.

## Gwent

Tackling child exploitation is a **Gwent Police** force wide priority and resources are allocated depending on the nature of the report or investigation. For example if there is immediate threat, risk and harm then an immediate response would be dispatched from a response team and any resultant investigation allocated to specific teams. This could take the guise of one of the dedicated exploitation teams, one of the public protection teams, MDS team or proactive SOC teams, CID or Major Incident Team, depending on the nature of the incident. Where investigations are allocated for cases that are investigated outside of public protection, there are safeguarding resources allocated as integral to the investigation to support the young person and link with partners for a multi-agency safeguarding approach.

Through the Serious Violence Duty the Gwent OPCC along with partners has developed a strategy and a strategic needs assessment. It has adopted a data driven approach to preventing serious violence with an emphasis on understanding youth violence, where it occurs and who is affected. It also addresses the risk factors for youth violence with evidenced based interventions with are frequently evaluated through the commissioning process.

There are also bespoke resources allocated to the wider objective of tackling child criminal exploitation and these officers work across the force area to ensure that the communities of Gwent have resources allocated to this issue. Gwent Police is split into two Local Policing Areas (LPA). Each LPA has an exploitation team. These are part of the Public Protection Teams and work within the two Public Protection Units. The department is overseen by a Detective Superintendent and in each area, the DCI has overall responsibility for bringing together the collective partnership response to child exploitation through MACE meetings.

Each Exploitation Team also has a dedicated DI within each LPA. The DI has daily oversight of the exploitation teams, which are made up of 2 DS' and 12 PC's across the force who deal with child sexual and criminal exploitation. The Teams use the 4P template to record activity in line with the prevent, protect, prepare and pursue methodology and record disruptions undertaken under these headings.

The force takes a trauma informed approach to vulnerability and its work on criminal exploitation, building on from the work on Adverse Childhood Experiences it has invested in dedicated vulnerability training and has a dedicated trainer to drive a trauma informed approach throughout the force. The force training days deliver training in this area all of which helps the force to support front line officers and raise awareness. Additional to this, **Gwent Police** funded

## OFFICIAL - Swyddogol

2 exploitation trainers to deliver training internally and externally to ensure that local businesses were trained in accordance with Operation Makesafe. These inputs have largely provided awareness to partners but has been of benefit in supporting the work of frontline officers and investigative teams.

### North Wales

**North Wales Police** has a Crime management plan which ensures that there are clear remits of ownership for specific crime types. The force has an automated daily report which ensures that crimes such as CSAE are highlighted each morning. A Detective Sergeant will triage the crime to determine ownership with any Child Sexual Assault and Exploitation (CSAE) crime being allocated to either child protection teams, Onyx (Child exploitation) Amethyst team (RASSO) or CID.

**North Wales Police** has a dedicated child exploitation team. Their remit is to work with children at risk of all exploitation in partnership with statutory and non-statutory agencies. There is an offender focused approach with the team which includes conducting investigations or identifying where there are concerns meriting further investigation and preparing intelligence packages. Onyx also take the lead on management and monitoring of any CAWN (child abduction warning notices) given, as well as providing advice to other officers in applying for any civil orders.

The force OCAIT is a team investigating online indecent images of children. The teams' remit includes taking ownership of OCAG (online child abuse activist groups) referrals (sometimes referred to as vigilante groups) referrals which is not standard practise nationally, but they feel the team have the right skill and expertise as well as capacity to do so. OCAIT conduct proactive operations working with North West ROCU to target people who are suspected of being willing to travel and meet children following online grooming.

These specialist teams feed information into their daily and monthly tasking processes to highlight the highest harm perpetrators, and request specific actions, intelligence gathering, disruption or bid for additional resources. Higher harm cases such as group based offending perpetrators, or a perpetrator of multiple children could be referred into L2 TTCCG.

The resourcing of child criminal exploitation is not confined to PVPU Teams. There have been cases which have been discussed at their tasking meetings and ownership has been transferred to their Serious Organised Crime teams, thus demonstrating that child exploitation is a priority for all **North Wales Police**, not just child protection teams.

Some of their operations have demonstrated their understanding of children having been exploited into criminality with strong decision making around not prosecuting children, for example in drug supply offences. Examples are Operation Tylluan which saw people charged with drug supply offences and the human trafficking of a 15-year-old child who had been exploited into supplying class A drugs. The child was seen and treated by police as a victim from the very start and never prosecuted for any offence.

## OFFICIAL - Swyddogol

Operation Mamba was an operation in response to a cohort of children who were seen as disruptive and abusive, often presenting intoxicated in public or being reported missing. The operation by the Onyx team recognised this behaviour as signs of exploitation and adopted them as victims of crime rather than perpetrators of disorder/ASB. Through months of persistent engagement, the children made disclosures of abuse. Several arrests and criminal charges against adults followed.

The force is continually seeking to improve multi-agency working across the force, particularly around multi agency safeguarding hubs. There have been significant developments in implementing these partnership working agreements in 2023/2024.

## South Wales

**South Wales OPCC** state that the Violence Prevention Unit have funded Safeguarding Adolescents from Exploitation (SAFE) and Contextual, Missing, Exploitation, Trafficking (CMET) Coordinators for several years to help local organisations to operate within the local contextual safeguarding framework through a range of methods including Strategic Panels, and Policy and Partnership meetings.

Currently, there is a Coordinator funded in Cardiff & Vale (SAFE) and Swansea (CMET), with additional funding set aside to support a Coordinator role in Cwm Taf Morgannwg to ensure there is work being done right across the police force area. Coordinators are responsible for embedding a localised, multi-agency collaborative approach to protect young people at risk of, or who have been affected by violence and child criminal exploitation. They ensure that specialist interventions are kept up to date with information, known best practice, produce various guidance documents and collate training packages or advertise training sessions relevant to specialist interventions regularly through CMET and SAFE newsletters.

Data recording and sharing has improved significantly in Cardiff, and Swansea since the Coordinators have been in post – data recording has been aligned across various interventions and updated information sharing agreements have been adopted by interventions going hand in hand with clear referral pathways to not only improve data quality and quality of support, but also to reduce re-traumatisation in young people who are engaging with a mix of statutory and specialist services.

Two Youth Outreach Workers are also funded within 'Fearless' for Crimestoppers, who delivery sessions to groups of young people across South Wales, with one session focused on child criminal exploitation.

**South Wales OPCC** also provides annual funding to South Wales Victim Focus (Victim Support) who provide support to victims of crime, including child criminal exploitation. During 2023-24, South Wales Victim Focus supported 466 individuals in relation to child criminal exploitation. The availability of support for victims and/or their parents can be integral in facilitating continued engagement within the criminal justice process.

According to **South Wales Police** the response and allocation of resources is based on the identified threat, risk and harm at the time of report. Although uniformed officers may attend an

initial report of suspected child criminal exploitation, it does not mean they will retain the incident for ongoing management and investigation.

In October 2022, **South Wales Police** established dedicated child exploitation investigation teams, whose remit has evolved from child criminal and sexual exploitation, to now include adult exploitation cases under a prescribed terms of reference, as there are occasionally those cases which may be better managed through Organised Crime Teams, Criminal Investigation Departments in addition to Rape Investigation Teams, notwithstanding those cases with a clear on-line element which may fall to the Police On-Line Investigation Team. Where exploitation cases have significant force wide implications and risk, through the prescribed tasking arrangements there is the ability for cases to be escalated to either the Force Organised Crime Unit or the Regional Organised Crime Unit for ownership.

The dedicated local policing-based Exploitation Teams fall within the governance of the Safeguarding and Public Protection Department which has centralised policy control. Initially the teams had a single strategic Detective Inspector having responsibility for three geographically based investigation teams aligned to each Basic Command Unit, supported by a fourth strategic team having responsibility for policy, training and the identification of risk through the application of warning markers. The structure of the dedicated exploitation teams has evolved in the last 18 months following the realignment of the wider local policing Safeguarding functions under the central command, resulting in the Exploitation Investigation Teams and Missing People teams being amalgamated, due to the intrinsic links between missing and exploitation.

The new structure has a Detective Inspector based in each of the three Basic Command Units whose focus is on safeguarding and prevention planning with Partners, to work with those highest harm/repeat missing children and young people. This senior investigating officer will then progress the cases via exploitation teams to safeguard victims and disrupt suspected perpetrators for alternative offences in addition to prosecuting substantive exploitation cases through to court. The remit of the fourth strategic team will change in September 2024 as in addition to their existing remit, they will have responsibility for all National Referral Mechanisms (NRMs) received by the force with additional support from an intelligence officer. This whole system approach is likely to result in enhanced outcomes for children and young people subject to exploitation.

As resources are finite, one of the challenges in the assessment and subsequent prioritisation of those 'at risk' from exploitation is not having a pan-Wales exploitation risk assessment tool. In 2021/ 22 Dr Samantha Clutton was working on Child Exploitation Toolkit which was due to cover child criminal and sexual exploitation, which would be in line with the Welsh Safeguarding Procedures and be published on the Welsh Government website, but to date this has not come to fruition. Whilst there is plenty of material on the signs and symptoms of exploitation (criminal and sexual), there is no means/matrix to prioritise those at greatest risk or need.

In the lead up to the implementation of the dedicated exploitation teams, **South Wales Police** invested heavily in training them, taking lessons learnt from Operation Linden (investigations into how South Yorkshire responded to allegations of child sexual abuse) and the Independent

OFFICIAL - Swyddogol

Inquiry into Child Sexual Abuse (IICSA) findings. A bespoke training programme was developed using expertise from Programme Hydrant, Tackling On-Line Exploitation (TOEX), St Giles Trust, National Youth Advocacy Service and other law enforcement colleagues in forces. In 2023 **South Wales Police** completed a large programme of training and CPD to all officers in contextual safeguarding and identification of risk in relation to missing people.

In 2023 **South Wales Police** launched Operation Amddiffyn, an animation led CPD input which focuses on six holistic themes which were identified through the findings of national learning events and reviews, which cover coercive and controlling behaviour, professional curiosity, victim blaming language, data quality, suspect focus and voice of the victim. To date Operation Amddiffyn has been delivered to more than 2400 officers and staff as well as externally to the Violence Against Women and Girls (VAWG) National Conference on Vulnerability and Exploitation Investigations, to other Welsh forces, NYAS Cymru project workers and the NPCC VAWG Taskforce Practice Sharing Event.

At the end of the academic year 2023/24 officers commenced a series of awareness raising inputs to parents/carers of children in secondary education, to increase the awareness, signs and safeguarding options in relation to child exploitation (criminal and sexual, contact and on-line offending). Thirty-seven secondary schools across the Force have signed up to the engagement event, with delivery to resume at the beginning of the new academic year.

National initiative 'Operation Makesafe' is also utilised within the force area with community safety partnerships leading the way in delivering this training to partners. Several establishments within the major cities have been tested in their response to age/relationship inappropriate attempts to purchase hotel rooms. There have also been multi-agency days of action to target 'vape-shops' as they are seen as means of befriending and inducing young people to carry out drug related activity.

**South Wales Police** has had no additional funding opportunities in support of the reshaping of the model outlined above.

Ein cyf/ Our ref: CEO.14882  
Gofynnwch am/ Please ask for: Sonja Wright  
Rhif Ffôn / Telephone: 01267 239654  
Dyddiad/ Date: 23<sup>rd</sup> August 2024

Swyddfeydd Corfforaethol, Adeilad  
Ystwyth  
Hafan Derwen, Parc Dewi Sant, Heol  
Ffynnon Job  
Caerfyrddin, Sir Gaerfyrddin, SA31 3BB

Corporate Offices, Ystwyth Building  
Hafan Derwen, St Davids Park, Job's  
Well Road, Carmarthen,  
Carmarthenshire, SA31 3BB

Buffy Williams MS  
Chair: Children, Young People and Education Committee

Email: [SeneddChildren@Senedd.Wales](mailto:SeneddChildren@Senedd.Wales)

Dear Ms Williams,

## Re: Inquiry into Children and Young People on the Margins

Thank you for your letter of 17 July 2024, in which you request views on three specific points relating to 'children and young people on the margins'. Our response to each point, together with further comments regarding training and processes in place within Hywel Dda University Health Board to promote awareness of child exploitation and identification of risk, are presented as follows:

### **The scale and nature of children and young people presenting in accident and emergency departments with injuries that suggest they may be the victims of child criminal exploitation, and details of any specific strategies and/or projects that health boards are involved with in this regard.**

The exact scale and nature of children and young people presenting at Accident and Emergency Departments or Minor Injuries Units in Hywel Dda University Health with injuries that suggest that they may be victims of child criminal exploitation are difficult to quantify. This is due to the system of coding attendances on the Welsh Patient Administration System.

However, a review of child safeguarding reports to Local Authority Children Services from July 2022 (when a new system was implemented) to 12 August 2024 highlights children (60) who presented to the Emergency Department, Minor Injury Department and/ or attended Specialist child and adolescent mental health service (sCAMHs), and disclosed or were identified as being at risk of child sexual exploitation, missing, or criminal exploitation.

Any young person under 18 years attending Sexual Health services will have CSERQ (Child Sexual Exploitation Risk Questionnaire) completed. This is further promoted for use in Emergency Departments, Minor Injury Units and Paediatrics.

The Health Board also has in place a Standard Operating Procedure for Putting an Alert Risk of Child Sexual Exploitation (CSE) on Children's Medical Electronic Records.

**Presentations to sexual health clinics that indicate risks of involvement in child criminal activities. Details of any specific strategies and/ or projects that health boards are involved with in this regard.**

Presentation to Sexual Health services that resulted in a child safeguarding report to Local Authority Children Services between July 2022 and 2024, includes 15 reports related to child sexual exploitation risks.

The Sexual Health service, Looked After Children (LAC) Lead Nurse and a children's residential home manager worked together to agree a procedure to standardise the communication of essential information, with other health care professionals and care-providers involved with the LAC, to ensure safe, adequate and appropriate care is given.

**Presentations to any other primary health care provision in respect of child criminal exploitation and missing children, alongside any recommendations you would like to see the Committee make in this regard.**

The Corporate Safeguarding Team do not routinely receive copies of safeguarding reports made by Primary Care services, although the Team works closely with Primary Care colleagues in providing safeguarding training and advice; however, we note some disclosures of child sexual exploitation/exploitation risks to School Nurses – 3 in the period reviewed. Primary Care colleagues have the option of completing reports via Datix Cymru, which would be an opportunity to strengthen the ability to have oversight of what they are reporting.

**By way of assurance, the following summary outlines training and processes in place within the Health Board to promote awareness of child exploitation and identification of risk:**

- Training:  
Mandatory Level 3 Safeguarding Children training in Hywel Dda University Health Board covers exploitation and sexual exploitation. Further to this, we regularly commission the Lucy Faithful Foundation to provide training in the UHB and actively promote #LookCloser resources and training.
- Regional Child Exploitation Strategy:  
The Health Board is an active member of the Mid and West Wales Regional Safeguarding Board, which has in place a Child Exploitation Strategy. The strategy builds upon the current developments, which are being overseen and driven by the strategic element of the Multi Agency Child Exploitation (MACE) meetings. We are committed to supporting children and young people in the region to lead safe, fulfilled lives and appropriate representation from the Corporate Safeguarding Team at strategic MACE meetings is in place, together with appropriate service representation at operational meetings.

- Looked After Children Health Assessments:  
The Looked After Children Health Assessment for children over 10 years also incorporates the CSERQ.
- Regional VAWDASV (Violence Against Women, Domestic Abuse and Sexual Violence) Strategy:  
The Health Board is an active member of the Regional VAWDASV Board. To support its strategic priority to increase awareness in children, young people and adults of the importance of safe, equal and healthy relationships and empowering them to make positive personal choices, the region is continuing to support the implementation of the new Relationships and Sexuality Education (RSE) Curriculum, Code and Guidance and deliver communication campaigns in relation to children and young people.

I trust that this information is of assistance.

Yours sincerely,



**Professor Phil Kloer**  
**Interim Chief Executive**

# Agenda Item 4.8



ASSOCIATION OF DIRECTORS OF EDUCATION IN WALES  
CYMDEITHAS CYFARWYDDWYR ADDYSG CYMRU

23 August 2024

Claire.homard@flintshire.gov.uk

Date **Dyddiad**  
Direct Line **Rhif Ffon**  
email **ebost**  
Contact **Cyswllt**

Buffy Williams MS  
Chair, Children, Young People and Education Committee  
Senedd Cymru

Dear Buffy

## **Inquiry into Children and Young People on the Margins**

Thank you for your letter of 11<sup>th</sup> July seeking ADEW views on a number of school-related issues relevant to this Inquiry. I hope the following responses will be helpful to the Committee.

**The role of schools as protective environments for children who are at risk of marginalisation (i.e. at risk of going missing, being criminalised, or marginalised in some other way). (Frontline stakeholders working with criminally exploited young people told us that none of the young people they work with are attending school).**

Schools play a vital role as a protective environment for all children and young people however this role is more poignant for vulnerable pupils. More often than not, schools are the only constant many of these young people have where boundaries are clear and expectations are high. This does require additional methods of support to be put in place as many of these children and young people display challenging behaviour and/or have difficulties managing their emotions. Developing positive relationships is pivotal in gaining trust and working with the children and young people to promote attendance by providing bespoke timetables with designated interventions to support their wellbeing.

Schools are aware that they have safeguarding duties towards all children on their roll and are part of their community. Most schools have good levels of pastoral care and make reasonable adjustments to support children and young people who are at risk of marginalisation. Schools are expected to follow relevant policies in order to minimise the risk of marginalisation, including Pastoral Support Plans, Attendance, Children Missing Education, Interim Tuition Support, EOTAS (Education Otherwise Than At School) and Safeguarding.

Many schools feel there is a shortfall in resources/capacity to support their vulnerable learners, while the challenges faced in retaining quality pastoral Teaching Assistant support can severely impact schools' ability to provide the best service.

In general, schools make good use of local authority Vulnerable Assessment Profile (VAP) data to support identification of those at risk of disengaging, and there are clear avenues of referral for support services. As part of the Welsh Government Youth Engagement & Progression Framework, the single point of contact (Lead Worker) is considered a particular strength. In some areas, schools are also part of the NEET prevention partnership and/or other structures/referral panels aiming to encourage relevant/bespoke and appropriate education or training placements resulting in greater participation in education.

In one particular local authority, schools can also seek support from the authority's Contextual, Missing, Exploited, Trafficked (CMET) team, who will support children and young people (individually or as a group) in contextual situations. CMET is an initiative of the LA Child and Family Service and is an operational forum that brings together professional organisations from across the authority to discuss concern relating to extra-familial harm (harm outside of the family home). This does not replace safeguarding of individual young people but recognises the important role that communities and partner agencies have in creating safe places and spaces for the authority's children and young people to spend time by taking a more contextual approach to safeguarding. This work is often undertaken in schools.

If a child is refusing to attend school, then all schools in a local authority will be aware of the referral system to the Education Welfare Service (EWS). Often, the EWS is part of a wider Education Welfare and Safeguarding Team, ensuring that Education Welfare Officers (EWOs) have access to clear and accurate safeguarding advice, so they are able to respond to the bespoke needs of the family and the child or young person regarding non-attendance at school. The Welsh Government Attendance grant helping to support this work is widely welcomed.

For children and young people who may not be able to access formal education (school), local authorities must ensure that they have access to appropriate education via their EOTAS systems. However, increased demand without relevant additional resources to meet this demand is a huge ongoing pressure for authorities. In some areas – rural authorities, for example – there are fewer alternative education providers such as training or work-based learning settings, meaning options are reduced.

Wellbeing interventions such as counselling, Emotional Literacy Support (ELSA), and Emotional Based School Avoidance (EBSA), as well as specific wellbeing support for children and young people accessing EOTAS, work well to support marginalised children and young people. All children and young people have access to school and community-based counsellors, both via self-referral and referral from professionals including teaching staff. Many schools also have youth work and/or youth mentor support to call on.

The Welsh Government's Wellbeing Grant is key to schools and local authorities being able to support their learners adequately.

**The extent to which school exclusions place children at additional risk of marginalisation, and whether current guidance allows schools' discretion about whether or not children should be excluded on safeguarding grounds (and the terms of any exclusion that they do make).**

There is evidence to suggest that exclusions have a major impact on children and young people and can put them at additional risk of marginalisation. Opportunities to safeguard the excluded children and young people are missed when they are not in school as there is often little oversight of their whereabouts and behaviours, meaning they may be free to do as they wish. There is also evidence to suggest that exclusion - and especially permanent exclusion - is a traumatising experience for a child or young person, who may feel the rejection acutely. From a school's perspective, it is very challenging.

The Welsh Government's April 2024 guidance<sup>1</sup> makes it clear that mitigating circumstances - including marginalisation - must be considered, as well as ensuring that the school behaviour policy is based on trauma informed approaches with a graduated response to exclusions. However, the decision to exclude is still at the discretion of the headteacher (or senior teacher acting in their place when necessary) and, invariably, when all interventions have been exhausted and serious breaches of behaviour have been incurred, a headteacher will consider permanent exclusion. This is understandable when headteachers must balance the health and safety of all pupils and the school community with the needs of the marginalised child or young person.

Local authorities have a role to ensure that schools follow appropriate process in line with Welsh Government exclusion guidelines and to challenge schools when they feel that the exclusion was inappropriate or not warranted.

### **The merits or otherwise of 'zero exclusion' policies, such as the one adopted by Southwark Council.**

While we feel that the use of exclusion should be reduced, there is a place for exclusion in cases of serious breach of policy or when the safety of the school community is at risk.

### **Concerns expressed by stakeholders about children who are EOTAS about which who has oversight of their well-being and safety when they are outside the maintained school system.**

Schools retain safeguarding and attendance duties for all pupils who are on their roll and should attend all meetings regarding the children and young people. EOTAS staff in most situations will be the first point of contact but schools should remain involved, ensuring regular updates on progress or otherwise and responding accordingly. However, there are concerns that lack of resources may negatively affect schools' ability to adequately support children and young people attending an EOTAS placement.

### **Concerns expressed by stakeholders about their experience of young people they refer to as 'unofficial exclusions' where pupils are not attending school.**

Schools are aware that all exclusions from school should be official and in line with guidance. This is included in all local authority training for senior school staff, governors and clerks to the governing body.

Unofficial exclusions provide the same amount of risk as official exclusions. There are instances where schools will call home etc to avoid an official exclusion, but this still means the pupil is not accessing education for a period of time. These do however generally tend to be for shorter periods - parents will collect children/young people and they will go home for the rest of the day and return the following day. As this is often the 'choice' of the parents, it is not classed as an exclusion.

### **Any other education specific issues relating to missing children or child criminal exploitation alongside any recommendations you would like to see the Committee make in this regard.**

Promoting the importance of positive relationships within educational settings is crucial to children and young people feeling safe, happy and secure enough to communicate with school staff. This can help reduce exclusions and lessen the likelihood of exploitation, criminal activity and general disengagement.

Funding for schools specifically to support children who may be at risk of becoming marginalised and vulnerable to child criminal exploitation such as county lines.

---

<sup>1</sup> [Exclusion from schools and pupil referral units \(gov.wales\)](#)

Welsh Government grants to support mental health and wellbeing, attendance and family engagement should continue and be increased in line with need.

Yours sincerely,

*Claire Homard*

**Claire Homard**  
**Chair of ADEW**

# Agenda Item 4.9



GIG  
CYMRU  
NHS  
WALES

Bwrdd Iechyd  
Addysgu Powys  
Powys Teaching  
Health Board

Inquiry into children and young people on the Margins

23/08/2024

Dear Ms Williams,

We have considered the questions below as requested.

- The scale and nature of children and young people presenting in accident and emergency departments with injuries that suggest they may be the victims of child criminal exploitation, and details of any specific strategies and/or projects that health boards are involved with in this regard.

Within the Powys HB area we don't have any A&E departments, rather a number of MIU's. The staff in these units have access to our Safeguarding Hub for discussion around any injuries that they have concerns about and would follow the Wales Safeguarding Procedures and complete Safeguarding referrals if there is any concern that they may be related to physical abuse or exploitation. These staff also access regular Safeguarding Group Supervision, which gives them the opportunity to share experiences and learning that may include such injuries. Children already known to be at risk of exploitation are flagged on a system that staff working in MIU and across the HB can check, to assist with this decision making. We have the CSERQ tool that staff use if they have concerns around sexual exploitation of a child, but we don't currently have an equivalent for children where there are concerns around criminal exploitation. This and the potential of the development of a training package around injuries that may be indicative of criminal exploitation would be something that we would be happy to be involved in.

We have a system where copies of the attendance of Powys children at A&E's out of county are shared with our Safeguarding Hub, when there are concerns around the attendance. These are forwarded on to the appropriate staff within the HB to assist in the development of risk assessments and the completion of Safeguarding referrals as appropriate.

- Presentations to sexual health clinics that indicate risks of involvement in child criminal activities. Details of any specific strategies and/or projects that health boards are involved with in this regard.

From a sexual health perspective, we undertake the CSERQ on all children and young people who contact/present to this service. Any positive screening will result in a Safeguarding Referral to the LA as per our internal process. We don't have any specific criminal exploitation screening tool or process as identified above. Sexual Health are currently linking with Safeguarding to look at how we can improve communication and information sharing between

sexual health and other services regarding children who are at risk of CSE/CE.

- Presentations to any other primary health care provision in respect of child criminal exploitation and missing children, alongside any recommendations you would like to see the Committee make in this regard.

We have a system currently where GP's and our out of hours service (Shrop Doc) are made aware of children who are on the Child Protection Register, so should these children present to their services they are aware of these concerns, which could include exploitation. The expectation is that this information would encourage a practitioner to use their professional curiosity if the child were to present with a concerning injury and make Safeguarding referrals as per the Wales Safeguarding Procedures. This is probably an area where we could look to explore and improve further around the exploitation agenda, as not all children open to the Exploitation arena are on the child protection register.

In addition to the above, health practitioners attend exploitation strategy meetings and feedback the outcome of these meetings to our Safeguarding Admin via a proforma. The Safeguarding Team then ensure that there are alerts on clinical systems that make staff aware of the risk of any form of exploitation. This ensures that any HB staff member coming across that child is aware of this risk.

The Safeguarding Team and a member of our Sexual Health Team are active members of the Local Powys Multi-agency MACE process and involved in the development of the most recent Exploitation Strategy.

The Safeguarding Team are also represented in the Community Safety Partnership and Channel process, which may also include discussion and information sharing that is relevant to the exploitation of children in Powys.

I hope that is helpful.

Yours Sincerely

Helen Lloyd  
PTHB Head of Safeguarding and Public Protection  
[Helen.Lloyd6@wales.nhs.uk](mailto:Helen.Lloyd6@wales.nhs.uk)

Bwrdd Iechyd Addysgu Powys, Pencadlys  
Ty Glasbury, Ysbyty Bronllys, Aberhonddu,  
Powys, LD3 0LU  
Ffôn: 01874 712730



Powys Teaching Health Board  
Headquarters, Glasbury House  
Bronllys Hospital, Brecon, Powys, LD3 0LU  
Phone 01874 712730

Rydym yn croesawu gohebiaeth Gymraeg  
Bwrdd Iechyd Addysgu Powys yw enw gweithredd Bwrdd Iechyd Lleol  
Addysgu Powys



We welcome correspondence in Welsh  
Powys Teaching Health Board is the operational name of  
Powys Teaching Local Health Board

# Agenda Item 4.10



GIG  
CYMRU  
NHS  
WALES

Bwrdd Iechyd Prifysgol  
Cwm Taf Morgannwg  
University Health Board



## Cyfeiriad Dychwelyd/ Return Address:

Bwrdd Iechyd Prifysgol	Cwm Taf Morgannwg
Cwm Taf Morgannwg	University Health Board
Pencadlys	Headquarters
Parc Navigation,	Navigation Park
Abercynon	Abercynon
CF45 4SN	CF45 4SN

**Ffôn/Tel:** 01443 744803

**Eich cyf/Your Ref:**

**Ein cyf/Our Ref:**

**Ebost Email:**

**Dyddiad/Date:**

PM/TLT

[Paul.Mears@wales.nhs.uk](mailto:Paul.Mears@wales.nhs.uk)

30 August 2024

Buffy Williams MS  
Chair  
Children, Young People and Education Committee  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN

(By email : [SeneddChildren@senedd.wales](mailto:SeneddChildren@senedd.wales))

Dear Buffy

## Inquiry into Children and Young People on the Margins

Further to your letter dated 17 July 2024 regarding gathering evidence as part of your inquiry 'Children and young people on the margins', where the focus is on missing children and criminalised children and young people, please note our responses to the three specific points within your letter.

**The scale and nature of children and young people presenting in accident and emergency departments with injuries that suggest they may be the victims of child criminal exploitation, and details of any specific strategies and/or projects that health boards are involved with in this regard.**

**Cadeirydd/Chair:** Jonathan Morgan **Prif Weithredwr/Chief Executive:** Paul Mears

*Croeso i chi gyfathrebu â'r bwrdd iechyd yn y Gymraeg neu'r Saesneg. Byddwn yn ymateb yn yr un iaith a ni fydd hyn yn arwain at oedi. You are welcome to correspond with the Health Board in Welsh or English. We will respond accordingly and this will not delay the response.*

<https://ctmuhb.nhs.wales>

Currently, there is no specific data collected to reflect how many young people are seen in Emergency Departments (ED) who may be victims of child criminal exploitation.

In the past year, Prince Charles Hospital (PCH) and school nursing in Merthyr Tydfil have seen a small cohort of young people related to the gang 'YAD'. Appropriate referrals were made to children's services under the 'duty to report'. Cwm Taf Morgannwg UHB was part of a multi-agency discussion to disrupt gang activity and ensure effective information sharing.

The number of children and young people reported for risk of exploitation from ED is very low. Referrals are submitted to the Multi-Agency Safeguarding Hub (MASH), where health is a key partner of the agencies based here.

CTMUHB safeguarding forms part of the Regional Exploitation Strategy Group and is working in collaboration with partner agencies on the development of a CTM regional strategy for exploitation, which is due for completion in September. This forum also allows for the discussion of themes and trends in the CTM region.

**Presentations to sexual health clinics that indicate risks of involvement in child criminal activities. Details of any specific strategies and projects involved by health boards.**

Whilst CTMUHB sexual health services have a child sexual exploitation tool built into their assessments. There is no current regional tool for criminal exploitation. One has been developed in partnership in the region along with the exploitation strategy; all services will use this.

Bespoke training on exploitation has been delivered to sexual health services and is integrated into all level 3 training packages. CTMUHB, in partnership with the police, has delivered multi-agency training to staff members on three occasions in the last year.

**Presentations to any other primary health care provision in respect of child criminal exploitation and missing children, alongside any recommendations you would like to see the Committee make in this regard.**

Any presentation to Primary Care would be reported through MASH. The Public Protection Nurses based at the MASH provide ad hoc support and advice to all staff, including those working in Primary Care.

Public Protection Nurses in MASH work closely with the police missing person team and attend multi-agency meetings on MISPER and child sexual exploitation.

The Health Board would also like to offer recommendations to the committee for consideration:

1. **Enhance Data Collection and Reporting:** It may be beneficial to establish a systematic method for collecting data on children and young people who present with injuries suggestive of child criminal exploitation in EDs. This data can help understand the scale and nature of the issue, enabling more targeted interventions. Implementing a standardised data collection tool across all health boards could improve the accuracy and consistency of reporting.
2. **Develop a Regional Tool for Criminal Exploitation Assessment:** While there is a child sexual exploitation tool integrated into sexual health services, there is a need for a similar tool for assessing the risks of criminal exploitation. Developing and implementing a regional tool, in conjunction with the exploitation strategy, would ensure that all services are equipped to identify and respond to potential cases of criminal exploitation effectively.
3. **Strengthen Multi-Agency Collaboration and Training:** Collaboration between health services, police, and other agencies is essential. Expanding bespoke training programs on exploitation for healthcare professionals, particularly those in primary care and emergency settings, can enhance their ability to identify and report exploitation cases. Regular multi-agency meetings and training sessions can foster better communication and coordination among stakeholders, leading to more effective safeguarding of at-risk children and young people.

CTMUHB appreciates the opportunity to contribute to this important inquiry and is committed to working collaboratively to safeguard children and young people at risk of exploitation. We look forward to further discussions and the implementation of effective strategies to address these critical issues.

Yours sincerely



**Paul Mears**  
**Prif Weithredwr/Chief Executive**

Jane Hutt AS/MS  
Ysgrifennydd y Cabinet dros Ddiwylliant a Chyfiawnder  
Cymdeithasol, y Trefnydd a'r Prif Chwip  
Cabinet Secretary for Culture and Social Justice, Trefnydd and  
Chief Whip



Dawn Bowden AS/MS  
Y Gweinidog Gofal Cymdeithasol  
Minister for Social Care

Llywodraeth Cymru  
Welsh Government

Buffy Williams MS  
Chair  
Children, Young People and Education Committee

6 September 2024

Dear Buffy,

Thank you for your letter of 18 July 2024, concerning the Committee's current inquiry into "children and young people on the margins" and work that is being undertaken by the Welsh Government to support missing children and criminalised children and young people.

### Missing Children's Toolkit:

Firstly, with regards to the Missing Children's Toolkit, I can confirm Welsh Government has provided funding to the organisation Missing People for the 2024-25 website costs associated with the Missing People toolkit. We will also pay the website costs for the next two financial years.

We are pleased to note the positive feedback regarding the toolkit which has helped inform our commitment to ongoing funding. We believe that the funding for the toolkit will allow partner agencies to continue using the resource as part of better multiagency working to ensure that no child or young person is missed, or "falls through the gaps".

### Funding for Hillside Secure Children's Home:

In terms of funding at Hillside, this is a complex issue as unlike England, Hillside is the only such facility in Wales. In terms of your questions to address:

#### **Question 1:**

**Clarify the funding arrangements for Hillside Secure Children's Home (both revenue and capital), including in relation to funding for education and health services for children at the home.**

Welsh Government is committed to ensuring that Hillside operates to the highest standard and we are aware of the difficulties Hillside and Neath Port Talbot County Borough Council (CBC) have faced in recent years relating to the running costs and maintenance costs of

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Dawn.Bowden@llyw.cymru](mailto:Gohebiaeth.Dawn.Bowden@llyw.cymru)  
[Correspondence.Dawn.Bowden@gov.wales](mailto:Correspondence.Dawn.Bowden@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Hillside. The table below outlines the considerable capital funding that has been provided to Neath Port Talbot CBC for Hillside since 2009:

2009/2010 and 2010/2011	The building of four additional bedrooms onto existing bedroom corridors within two of the existing living units, building of new workshops to facilitate expansion of Hillside's educational capacity and modification of existing structures within the unit to allow development of new office, storage and training facilities.	£1,200,000
2019-20	<ul style="list-style-type: none"> <li>• Refurbishment of all bedrooms;</li> <li>• Installation of signs of life cameras;</li> <li>• Changing view finder panel and doors;</li> <li>• Installation of a fob system for all internal doors;</li> <li>• Interactive TV based reward system;</li> <li>• Upgrade of CCTV;</li> <li>• Creation of a performing arts space, training room, and upgrade to gym;</li> <li>• 4 original bedrooms to be turned into well-being spaces for young people and the staff;</li> <li>• Visitors flat to be turned into a resettlement flat;</li> <li>• Redesign of the garden area;</li> <li>• Replacement of astro turf with a 4G pitch;</li> <li>• Improvement of acoustic environments to assist with autistic spectrum disorders;</li> <li>• Refurbishment of the classroom areas; and</li> <li>• Update of reception.</li> </ul>	£2,000,0000
2021-2022	To carry out further improvements to Hillside Secure Children's Home, following the current refurbishment work on the young people's living spaces and staff sleep-in rooms.	£480,000
2024-2025	Towards the total cost of £580,000 (yet to be sourced in full) for the alterations, changing one large area (the current sports hall) into one medium sized area and two smaller sized areas consisting of an upstairs and a downstairs. The upstairs area will include a 'Dojo Room' used for Yoga, Boxercise, Aerobic classes, Pilates and an overall space which the children can use as a breakout room for sessional work with staff. The ground floor will be split into two sections and will consist of a traditional Sports Hall and a Multi-gym Fitness Suite.	£200,000
<b>Total</b>		<b>£3,880,000</b>

### Revenue/ Running Costs of Hillside Secure Children's Home:

Neath Port Talbot has provided us with a high-level breakdown of costings for running Hillside, please note that these costs include the forthcoming increase in the costs of Mental Health Services from February 2025 onwards (this is referenced under "Health Services").

<b>Employee Costs</b>	<b>4,145,290</b>
<b>Premises</b>	<b>518,130</b>
<b>Transport</b>	<b>12,500</b>
<b>Supplies and Services</b>	<b>478,190</b>
<b>SLA's</b>	<b>1,300,880</b>
<b>Total Expenditure</b>	<b><u>6,454,990</u></b>

In terms of revenue, the sole stream for generating revenue at Hillside is from the contract in place between YCS and Hillside (due to commercial sensitivity we are not privy to the exact details of this), and the revenue incurred from Local Authorities utilising Welfare beds at Hillside. Hillside advised that for the financial year 23/24 Hillside was "just about breaking even".

#### *Health Services:*

Young people at Hillside can access mainstream NHS provision from the Swansea Bay University Health Board but costs for these services cannot be disaggregated. Due to the health needs of the young people at Hillside and the challenges with accessing mainstream health services from a secure unit, Hillside also commissions in-house support directly.

In terms of health, our understanding from liaising with England is that the health provisions within the English secure estate are funded directly in line with the Secure Stairs Framework aimed at supporting children and young people which is set out within the Health and Justice Children Programme National Partnership Agreement (2023-2025).

Welsh Government has worked alongside Neath Port Talbot Council and Swansea Bay and in establishing a Service Level Agreement (SLA) between the organisations however an agreement comparable to the English model has not been established and the costs for any integrated Health Services at Hillside are paid for by placing Local Authorities and the Youth Custody Service (YCS), taken from the revenue generated from the bed prices, the bulk of which are paid for by Local Authorities as the price per bed for a Welfare placement is £1,800 per night.

Concerns had been raised by HM Prison and Probation Service (HMPPS) regarding the lack of mental health services for young people being supported at Hillside. Overall, Swansea Bay University Health Board is responsible for providing access to health care to young people placed at Hillside. However, this responsibility does not extend to bespoke, specialist in-reach support to meet the demands of the young people at Hillside. A contract with a private provider for mental health services has been in place to deliver Psychiatry and Psychology support to Hillside.

Welsh Government can confirm that from February 2025 a Service Level Agreement (SLA) will be in place between Hillside and Swansea Bay enabling a more holistic approach to the mental health needs of the young people residing at Hillside. Neath Port Talbot advise that the cost of the existing mental health provision was £328,000 per year, the cost for the more enhanced service will be around £600,000 per year. Whilst the initial focus has been on access to mental health services, engaging the health board fully in the partnership arrangements that are in place will also ensure any other gaps in service provision can be explored, including how any gaps are resourced.

### *Education Services:*

The education provision at Hillside Secure Unit is, as with Health, paid for from the revenue generated from the bed prices. It is paid:

- by the placing Local Authorities for welfare placements.
- by the home local authority for children on remand. The Ministry of Justice (MoJ) gives local authorities an annual sum of money for remand, based on their previous use of remand. The funding from the MoJ is not ring fenced for remand and can be used by local authorities but with the understanding that once it is spent, if there is a remand there is no additional funding, and the local authority will have to meet any remand costs. (If a child is then sentenced the cost of remand is picked up and recharged by the home local authority to the YCS.)
- by the YCS for 4 youth custody places. Unlike welfare beds, YCS pay 365 days per year, even if the beds are empty, so they have guaranteed capacity if needed. YCS produces a specification that outlines the services they expect to receive for children placed at Hillside SCH. Hillside SCS and Neath Port Talbot CBC produce a “bed price” that covers all of those elements.

We have had discussions with officials from DfE who confirm that the same method of funding Education within the Secure Estate is adopted in England, Education is funded by the Ministry of Justice and Local Authority’s akin to the way it is funded in Wales. A local secondary school (Cefn Saeson) is currently commissioned by Neath Port Talbot CBC to provide the education provision at Hillside, although I understand that this contract is due to expire next year and alternative provisions are being considered.

### **Question 2:**

**Set out the relevant legislative provisions from which those funding arrangements originate**

Placements for young persons requiring detention on welfare grounds (under section 25, Children Act 1989) are commissioned by individual local authorities.

Local Authority run accommodation is governed by part 6 of the Social Services and Wellbeing (Wales) Act 2014 (SSW Act), by requiring local authorities to secure sufficient accommodation in their areas for the children they look after (section 75), and to accommodate children who (inter alia) are under police protection, in detention or on remand (sections 76 and 77). Section 119 also provides for the placement of children in secure accommodation.

Part 8 of the SSW Act reinforces the Local Authority's obligations and covers the Code of Practice for Directors of Social Services and includes at point 71 the Director's responsibility for ensuring that strategic plans are in place for children who are looked after and this involves "planning that embraces all aspects of a child's wellbeing including health and developmental needs, stability and permanence, and educational attainment, and focuses on improving outcomes for looked after children."

Additionally, The Care Planning, Placement and Case Review (Wales) Regulations (2015) sets out in detail the onus on the Local Authority to ensure that appropriate levels of health care and access to education are provided, noting that when a child is not placed within the responsible Authority's borders it should still be responsible for ensuring that a plan is completed that takes in to account that child's needs.

In terms of provision for children in custody on criminal justice grounds, this is a complicated matter due to the interface between the reserved area of criminal justice and devolved areas including health and education. The devolution of youth justice to Wales could create an opportunity to clarify this, depending on the approach to devolution taken.

### **Question 3:**

**Set out your understanding of the differences in the funding and commissioning processes between Hillside secure children's home and equivalent homes in England and the reasons for that difference?**

The difference in funding for Health Services at Hillside as opposed to their English equivalents has been set out. The Youth Custody Service (YCS) are responsible for commissioning of services and contractual management of private sector sites such as Hillside Secure Children's Home, as well as placing children and young people remanded or sentenced to custody. As this is a reserved service Welsh Government are not involved in contractual arrangements and therefore do not hold any information on the contract or financial information.

In terms of the funding for education, officials have liaised with counterparts at the Department for Education (DfE) who confirm that whilst DfE hold policy responsibility for Children's Services and oversees the statutory functions related to Secure Children's Homes in England, DfE does not provide any funding for operational purposes or linked to Education. There appears to have been some confusion in information shared with Neath Port Talbot CBC and Hillside around this, as NPT have advised Welsh Government that they were under the impression that Education was funded directly by DfE, this does not appear to be the case and education in the English SCHs is funded in the same manner as the education provision at Hillside is.

Further to this, DfE advised officials that the Secretary of State has the power to provide capital monies for Local Authority run secure children's homes under s.82 of the Children Act 1989 and for those owned and managed by private or voluntary organisations under s.14 of the Education Act 2002. This is not a duty to provide capital investment but a provision that means the Secretary of State can choose to provide this money.

I have already outlined the monies provided for capital funding at Hillside, which totals £3.88million since the 2009/2010 financial year.

## Future Planning:

We will continue to work with Neath Port Talbot CBC around how best Hillside can continue to support children and young people that require Secure Accommodation, this involves working alongside Hillside and our partner agencies to ensure that the service can best meet the needs of these individuals. In addition to this, Welsh Government are considering longer term plans for the Secure landscape in Wales, this may include moving towards smaller facilities which could provide regional secure accommodation (referred to as Small Homes). This move would be in line with that which is considered in the best interests of young people in Wales as this would provide children with placements closer to home, further to this research around secure provision for young people indicates that children feel safer in smaller units

In the short- medium term we continue to work closely with our partner agencies including the Ministry of Justice (MoJ) and DfE to collaborate where we can on ongoing work to improve the services for children placed at Hillside, including working with DfE around the transition of young people out of secure accommodation.

We are also working with the third sector and Local Authorities around the Early Intervention Services and Edge of Care Services available across Wales to help rebalance the distribution of services with the aspiration that fewer young people will become looked after and by intervening earlier the need for Secure Accommodation would lessen.

In addition to the above, we are working closely with Local Authorities to increase the availability of regional residential provisions for children and young people with complex needs, again we hope that by providing a holistic service, closer to the young person's home at an earlier juncture may reduce the demand for secure accommodation.

Thank you once again for your letter and I hope that my response is helpful.

Yours sincerely,



**Jane Hutt AS/MS**

Ysgrifennydd y Cabinet dros Ddiwylliant a Chyfiawnder  
Cymdeithasol, y Trefnydd a'r Prif Chwip  
Cabinet Secretary for Culture and Social Justice,  
Trefnydd and Chief Whip



**Dawn Bowden AS/MS**

Y Gweinidog Gofal  
Cymdeithasol  
Minister for Social Care

# Agenda Item 4.12

**Lynne Neagle AS/MS**  
Ysgrifennydd y Cabinet dros Addysg  
Cabinet Secretary for Education



Llywodraeth Cymru  
Welsh Government

Ein cyf/Our ref: MA/LN/5866/24  
Buffy Williams MS  
Chair  
Children, Young People and Education  
Committee Welsh Parliament  
Ty Hywel  
Cardiff Bay  
CF99 1SN

6 September 2024

Dear Buffy

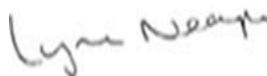
Thank you for your letter dated 24 June regarding your proposed inquiry into teacher recruitment and retention.

I share the committee's concerns on the recruitment of science specialist teachers and teachers able to teach through the medium of Welsh.

Teacher recruitment and retention is affected by a myriad of complex and interconnected factors. I have set out in the attached annex responses to the questions asked in your letter and trust they are useful as you continue scoping your inquiry into this area.

I look forward to working with you on your proposed inquiry so that we can ascertain what further actions and activity we can undertake to support our teaching workforce and education system in Wales.

Yours sincerely,



**Lynne Neagle AS/MS**  
Ysgrifennydd y Cabinet dros Addysg  
Cabinet Secretary for Education

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Lynne.Neagle@llyw.cymru](mailto:Gohebiaeth.Lynne.Neagle@llyw.cymru)  
[Correspondence.Lynne.Neagle@gov.wales](mailto:Correspondence.Lynne.Neagle@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

## Annex

### 1. What is your general assessment of the state of teacher recruitment and retention across Wales across the statutory age range, both in terms of the immediate staffing challenges facing schools and the Welsh Government’s longer-term aims to raise educational standards?

Initial teacher education (ITE) recruitment into the primary sector continues to be buoyant. However, recruitment into secondary remains challenging, with strong competition from other sectors for graduates with STEM specialities, compounded by even smaller numbers with Welsh language capability.

Staffing challenges faced by schools are highly contextual and national level fulfilments and concerns (such as the level of ITE recruitment into primary, STEM subjects and Welsh medium) may not be applicable at a local level. The responsibility for the employment of teachers in schools lies with local authorities and governing bodies as the employing bodies. They are responsible for ensuring that sufficient, suitable staff are employed or engaged to work at their school/s in order to provide education appropriate for the ages, aptitudes, abilities and needs of their learners. You note in your letter that school specific data on their science departments is lacking; this is held by the local authorities. However, the School Workforce Annual Census (SWAC) does collect information on the teaching of subjects in schools and the number of hours taught across a two-week timetable. Further information can be found in the [School Workforce Census Results](#) publication and on the [StatsWales](#) website.

Information from the School Workforce Annual Census (SWAC) shows the full-time equivalent (FTE) number of teachers in academic year (AY) 2023/24 has decreased by 2.9% since AY2021/22 but is slightly higher than AY2020/21.

#### Full-time equivalent (FTE) number of teachers by sector, AY2020/21 to AY2023/24

	2020/21	2021/22	2022/23	2023/24
Nursery and Primary schools	11,620	11,950	11,770	11,245
Middle Schools	1,205	1,245	1,470	1,605
Secondary Schools	10,135	10,425	10,280	9,965
Special Schools	780	825	860	875
Pupil Referral Units (PRU)	250	255	260	300
Total	23,985	24,700	24,640	23,995

Source: School Workforce Annual Census (SWAC)

The pupil-teacher ratio (PTR) has increased in nursery, primary and secondary schools in AY2023/24, but is lower in all sectors compared with AY2020/21.

#### Pupil-teacher ratio (PTR) by sector, AY2020/21 to AY2023/24

	2020/21	2021/22	2022/23	2023/24
Nursery	13.6	10.9	10.5	11.4
Primary	21.9	21.0	20.9	21.3
Middle	18.0	17.4	17.2	17.2
Secondary	17.2	16.8	16.6	17.0
Special	6.9	6.7	6.7	6.7
Total	18.4	18.5	18.4	18.6

Source: Pupil Level Annual School Census (PLASC)

The patterns seen in both the teacher numbers and pupil-teacher ratios may be partly due to the [Welsh Government funding](#) provided to schools under the Recruit, Recover and Raise Standards (RRRS) plan to recruit extra staff to support pupils during the coronavirus (COVID-19) pandemic. Welsh Government provided the RRRS funding to schools during the pandemic and the recovery period up to financial year (FY) 2023-24, though the amount distributed decreased since the initial funding in FY2020-21.

The average number of applications received per advertised post in AY2022/23 was 7.8, down from 12.0 in AY2020/21. This pattern is reflected in all sectors with advertised posts in primary schools receiving 12.3 applications on average in AY2022/23 compared to 4.6 for posts in secondary schools.

### **Average applications per advertised post by sector, AY2020/21 to AY2022/23**

	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>
Primary Schools	19.3	14.1	12.3
Secondary Schools	7.3	5.5	4.6
All Schools	12.0	9.1	7.8

Source: School Workforce Annual Census (SWAC)

[My recent statements](#) have confirmed that our priority is to enable a system that is focused on delivering sustained improvement in educational attainment so that every learner can fulfil their potential.

The work to ensure that our learners have the best possible educational experiences and outcomes begins by ensuring that they are in school with high quality and experienced teachers who have the highest expectations for them. We are already taking steps to develop further support for schools to raise standards as set out in my recent Oral Statement. I will be making a further statement on our plans to raise standards in the Autumn.

## **2. How do you respond to the concerns raised by the science bodies about the sufficiency of science specialist secondary school teachers in Wales? Are there any other subjects about which you have particular concerns (e.g. Welsh (as a subject), modern foreign languages, mathematics and IT)?**

I recognise the vital importance of having this specialism in our schools to enable learners' progression, and the Curriculum for Wales expects learners to be able to increasingly specialise as they move forward with their learning.

The ITE priority subjects and/or phases are determined annually using School Workforce Census Data (SWAC) and Higher Education Statistical Authority (HESA) Data. They represent the subject or phase where there are immediate issues in both ITE recruitment and within the workforce nationally (including the Welsh-medium workforce). Identification of these subjects and/or phases enables the Welsh Government to provide targeted incentivisation to graduates in these areas to consider entering ITE, and thereafter the teaching workforce, via the Priority Subject Incentive (PSI) scheme. It should be noted that this is not a statistical exercise alone and that contextual factors must be used in determining the final list of priority subjects.

For a number of years STEM subjects and languages (including Welsh) have been a priority, and in many instances recruitment into ITE has been insufficient as the pipeline of students, from A-level Welsh for example, has been small and is further compounded by smaller numbers [studying their undergraduate degree through the medium of Welsh](#). In addition, STEM graduates particularly have a wide range of competitive career options available to them. The current priority subjects are:

- Biology
- Chemistry
- Design & Technology
- Information Technology
- Mathematics
- Modern Foreign Languages
- Physics
- Welsh

We are also taking action to help build specialist capacity within the existing teaching workforce. In the 2024-25 financial year, the Welsh Government provided nearly £163,000 to the Institute of Physics to deliver the Stimulating Physics and Whole School Inclusion and Equity networks. The Stimulating Physics Network provides targeted coaching to early career and non-specialist practitioners to design inspiring and engaging physics lessons and improve their understanding of physics qualifications and career pathways. Our Global Futures Programme for international languages is also focused on building the skills, knowledge, and experiences practitioners need to plan and deliver effective international languages provision.

In terms of the data the average number of applications for posts advertised have decreased for all subjects between AY2020/21 and AY2022/23. The average number of applications for priority subject posts, as identified above, are consistently below the average number of applications for all secondary posts. Welsh (1.8 applications per post), Information Technology (2.2), Physics (2.3) and Chemistry (2.8) received the lowest number of applications per post in AY2022/23. This compares to History (9.7), Physical Education (6.9) and English (5.0) which consistently receive a greater number of applications per post on average.

#### **Average applications per advertised post for priority subjects and selected other subjects, AY2020/21 to AY2022/23**

	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>
Biology	4.5	4.3	3.5
Chemistry	6.4	3.6	2.8
Design & Technology	6.2	2.8	3.4
English	8.7	6.5	5.0
History	24.4	8.8	9.7
Information Technology	3.6	2.6	2.2
Mathematics	4.7	4.6	3.5
Modern Foreign Languages	7.8	4.5	3.5
Physical Education	14.3	10.3	6.9
Physics	3.7	2.4	2.3
Welsh	2.6	2.3	1.8
<i>Primary Schools</i>	<i>19.3</i>	<i>14.1</i>	<i>12.3</i>
<i>Secondary Schools</i>	<i>7.3</i>	<i>5.5</i>	<i>4.6</i>
<b>All Posts</b>	<b>12</b>	<b>9.1</b>	<b>7.8</b>

Source: School Workforce Annual Census (SWAC)

It should be noted that these are national subject priorities identified utilising national level data sets. There may be different recruitment concerns at a local authority or school specific level.

### 3. What is your assessment of the sufficiency of the education workforce who are able to teach through the medium of Welsh and the importance of this to the Welsh Government’s ambitions for the development of proficiency in Welsh in both Welsh-medium and English-medium schools?

Our ambition for a million Welsh speakers by 2050 demands far-reaching changes and actions to be taken. Our new curriculum puts the Welsh language at the heart of learning in Wales but if we are to create a nation where people speak and use the language as part of their everyday lives, increasing the number of learners in Welsh-medium schools is vital. For us to do that we need a strong and skilled workforce.

We published the [Welsh in Education Workforce Plan](#) in May 2022. The plan includes a range of actions for Welsh Government to take in partnership with stakeholders to address four key aims:

- Increasing the number of Welsh and Welsh-medium teachers
- Increasing the number of Welsh-medium teaching assistants
- Developing the Welsh language skills of all practitioners
- Increasing leadership capacity in the Welsh-medium sector and developing the leadership of Welsh in all schools.

The latest data on the number of Welsh-medium teachers can be found below. We are making gradual process, but it remains a huge challenge. We will continue to work with partners including schools, CYDAG, the Coleg Cymraeg Cenedlaethol and our ITE partnerships to support recruitment to our secondary sector. We have said on a number of occasions that we are open to any suggestions on any new ideas to support recruitment.

We will be publishing an update to the data analysis and WESP analysis documents that sit alongside the Welsh in education workforce plan in the autumn with the latest data on the workforce.

<b>Number of primary teachers who teach through the medium of Welsh</b>			
<b>2022/23 baseline</b> 2,874	<b>2031 target</b> 3,900	<b>Gap to target</b> 1,026	<b>Approx additional no. of teachers per year</b> 103
<b>Number of secondary teachers who teach Welsh as a subject or subjects through the medium of Welsh</b>			
<b>2022/23 baseline</b> 2,555	<b>2031 target</b> 4,100	<b>Gap to target</b> 1,545	<b>Approx additional no. of teachers per year</b> 170

An External Implementation Group has been established to monitor progress and will review the proposals for implementation in future years once the updated data analysis and WESP analysis documents are available.

We have also appointed a secondary headteacher on secondment to start in September 2024 who will lead on reviewing the actions taken to date and work with the sector and key partners to develop further actions that will support the workforce implications of the Welsh Language and Education Bill.

The key challenge is around the recruitment of secondary teachers for Welsh-medium schools and this has been the focus of the number of actions we have taken since 2022.

These actions include:

- Continuing to provide opportunities through the Cynllun Pontio for teachers who have been away from the profession to return to teaching; for primary teachers to cross over to the secondary sector, and for teachers from the English-medium sector to cross over to the Welsh-medium sector. A further 25 will start in September 2024 in key subject areas such as Welsh, maths and science.
- Supporting schools to develop innovative ways to solve some of their recruitment challenges through the Welsh-medium workforce capacity development grant (approximately £800k per academic year).
- Funding the Open University to expand its employment-based teaching pathway, to include design and technology and computer science from September 2023; these are subjects where there are a shortage of teachers and this route enables aspiring teachers to train in their communities and to be paid while training. The courses are available in both English and Welsh, however, for Welsh-medium schools the employment costs are fully funded by Welsh Government.
- Funding for the Coleg Cymraeg Cenedlaethol to establish Cadw Cyswllt (keeping connected) which promotes opportunities for students in England to return to Wales to prepare to teach.
- Funding for the Coleg Cymraeg Cenedlaethol to provide mentoring sessions to approximately 50 individuals as part of the Addysgu'r Dyfodol (future teaching) programme. The programme provides 3 online mentoring sessions to undergraduate students and the opportunity to undertake 2 work experience days in a school (primary/secondary, Welsh-medium or bilingual) to encourage them to go into teaching. A tracking system has been put in place to understand the impact of the programme.
- Establishing the Welsh in education Teacher Retention Bursary. £5,000 will be available to teachers who have achieved Qualified Teacher Status since August 2020, and who have completed three years of teaching Welsh, or three years of teaching through the medium of Welsh, in the secondary phase. This bursary will initially be available until Autumn 2028 and will provide us with data on whether the introduction of a bursary encourages teachers to enter and stay in the profession.

Alongside actions to support an increase in the number of secondary Welsh-medium teachers we have also been continuing to implement actions to support all practitioners to develop their Welsh language skills to be able to teach and use the language in all our schools.

We have developed guidance for local authorities to analyse workforce data in terms of practitioners' ability to teach through the medium of Welsh and the Welsh language skills of practitioners in the English medium sector. This will enable local authorities to report consistently on their workforce and training development needs as part of their Welsh in Education Strategic Plans.

The National Centre for Learning Welsh is now taking a co-ordinated role in planning the delivery of Welsh language professional learning for the education workforce.

A full scoping exercise has been undertaken, working with all local authorities and regional consortia to understand the Welsh language skills development needs at a local level. Based on the scoping, the Centre has now developed a plan for new delivery models to be piloted, including school-based support, residential courses, tutor-led online courses and professional learning resources. The full offer for the 2024/25 academic year has been agreed with local authorities and information will be available on the Centre's website soon.

From September 2025 the Centre will be managing the intensive courses available through the Sabbatical Scheme alongside other courses being developed for the education workforce. The Centre has also been working with ITE providers to provide resources to support students to develop their Welsh language skills while they are training. These have now been shared with all providers and will be incorporated into courses from September.

The Welsh Language and Education Bill sets new ambitions to enable all learners to use the language confidently. The workforce is crucial to the realisation of the aims set out in the Bill and the steps that we are taking will support the implementation.

#### **4. Do you believe that the bursaries currently offered to trainee teachers are sufficient, specifically within the context of higher bursaries offered in England?**

The issue of incentives is a complex one and needs to be set in the context of developing the profession as an attractive career proposition.

[2022 research](#) and [further 2023 research](#) (utilising England's ITE data and incentive scheme broadly equivalent to the PSI) shows consistent evidence that increases in incentives increases recruitment. Similar research has not been conducted on Wales' incentive schemes. The Minority Ethnic Incentive scheme (MEI) is too new for a suitable number of cohorts/eligible persons to conduct this analysis presently. Analysis work on retention aspects around the Priority Subject Incentive (PSI) scheme, which closely resembles England's incentive scheme, is in the course of being implemented.

Welsh [research into recruitment](#) (and retention) of teachers into the workforce (conducted by EWC on behalf of the Welsh Government), [Welsh Government research](#) and [OECD research](#) indicate that incentivising entry into ITE is not the only consideration for ITE applicants and should form part of a wider holistic package of policy interventions. These include considerations around graduate levels of pay and conditions, early years support and professional development, and actions around pay, workload and wellbeing.

We offer a range of incentives to attract applicants into ITE in Wales. These schemes are targeted at those areas and subjects where recruitment is most challenging; priority subjects, the Welsh-medium sector and attracting more entrants from ethnic minorities. Eligible individuals can avail themselves of each of the incentive schemes. In academic year 2024/25, a total amount of £25,000 is available to those that meet the requirements of all three schemes:

- [Priority Subject Incentive scheme](#) (£15,000)
- [Iaith Athrawon Yfory scheme](#) (£5,000)
- [Minority Ethnic Incentive scheme](#) (£5,000)

The Welsh Government recognises the competitive incentive scheme available to subject specialist student teachers in England and it's potential to attract Welsh domicile graduates to study English Initial Teacher Training (ITT). However, there are limited resources available to us to encourage individuals to enter Welsh ITE, and difficult decisions must be made in recognition of the fiscal landscape.

As outlined in response to question 3 above, we have also established the Welsh in education Teacher Retention Bursary for teachers who have achieved Qualified Teacher Status since August 2020, and who have completed three years of teaching Welsh, or three years of teaching through Welsh, in the secondary phase. This £5,000 bursary will initially be available until Autumn 2028 and will provide us with data on whether the introduction of a bursary encourages teachers to enter and stay in the profession to inform future plans.

**5. Do you wish to raise anything else with us that you believe is relevant to any future work we undertake relating to teacher recruitment and retention?**

a. National marketing and advocacy activity to support ITE recruitment.

Promoting teaching as a career, getting undergraduates and A-level students engaged earlier, and creating new opportunities for adults to join the profession are crucial to ensure a pipeline into ITE and thereafter the teaching profession. Teaching Wales is a Welsh Government marketing campaign to encourage people into teaching.

Following a review of Discover Teaching, a recruitment campaign run by the Education Consortia, responsibility for the website transferred to Education Workforce Council and Welsh Government commissioned research in 2018 to inform a teacher recruitment marketing campaign. Teaching Wales was launched by Welsh Government in January 2019. The Educators Wales website, part of the EWC's education workforce recruitment advocacy service was launched in June 2021. Since the outset Welsh Government and EWC have worked extremely closely together on promotion of teaching as a career, linking up the marketing campaign and the advocacy service.

Teaching Wales is the overarching 'campaign brand' for national teacher recruitment campaigns (which directly refers people to Educators Wales and individual ITE centres to follow up contact). The initial priority of Teaching Wales was the promotion of priority subjects in secondary schools. The other two key strands developed since then has been attracting more people who can speak and teach in Welsh into the profession which also includes the Cynllun Pontio (the Welsh-medium conversion programme) activity and attracting more Black, Asian and Minority Ethnic individuals to teach. During the year we will be looking to expand the campaign into attracting more individuals to become teachers in special schools. Primary target audiences include; undergraduates and A-level students, Welsh speakers, Teaching Assistants, STEM under graduates and graduates, career changers, Black, Asian, and Minority Ethnic individuals, stay at home parent/carers and freelancers.

The Teaching Wales campaign, featuring real teachers in Wales, runs throughout the year with bursts at key decision making times (July to September and Jan to March). Activity includes a wide range of communication techniques including targeted social media, online advertising, Radio, TV catch-up, PR, outdoor advertising, and key events. There are close working relationships with each of the ITE Partnerships in Wales with regular updates and sharing of campaign activity to support the sector and join up our efforts to recruit more teachers into the profession. Since the end of October 2023, the campaign has generated over 4,500 click throughs from the Educators Wales website to ITE Partnerships.

Because of the need to increase the numbers of people who can teach in Welsh, a specific marketing working group has been established comprising Welsh Government, EWC, Coleg Cenedlaethol Cymraeg, and more recently the National Centre for Learning Welsh. The purpose of the group is to collaborate, share information and work together to develop a three-year marketing communications strategy. The focus of the first year has been looking at opportunities to work together and raise the profile of teaching through Welsh as a career, including attendance at the Urdd, National Eisteddfod and other major summer events. The work has also included meeting with all ITE Partnerships to understand students' motivations and barriers into choosing teaching as a career, ITE Partnerships' recruitment strategies and identifying opportunities to facilitate more joint working.

The [Educators Wales](#) recruitment, advocacy, and support service (led by the EWC and funded by Welsh Government) was launched in September 2021 and has engaged with over 27,000 individuals (correct as of January 2024) interested in a career in education.

The service seeks out opportunities for partnership working, such as supporting ITE Partnerships with innovative ideas to implement activity in their own recruitment strategies and plans, such as on campus promotion of ITE. Educators Wales also deliver information sessions on careers within education in Wales in schools and school careers fairs alongside larger scale events such as the Eisteddfod.

In addition to the above, the ITE Partnerships are required under their accreditation guidelines to have their own recruitment strategies in place. Welsh Government communications team work closely with EWC and HEIs' marketing teams to ensure synergy, value for money and aligned messaging across all Welsh Government, EWC and ITE Partnerships promotional activity in the ITE recruitment space.

The numbers applying to teach during Covid rose and has fallen again. To ensure our Teaching Wales campaigns are based on current insight and evidence, work is underway in to update our insight to understand motivations and barriers to going into teaching from our various audiences. This has included desk research, focus groups/1:1s, social media listening and now developing personas and messaging to inform the next steps in the campaign.

b. Student finance in Wales and information on Welsh undergraduates

In recent years Wales has set a precedent for providing the most generous student finance package available to eligible Welsh students. The PGCE attracts the annual [undergraduate financial support package](#) so ensuring the best possible support for student teachers. This means that an eligible student may apply for up to £10,315 or £15,170 maintenance support, subject to where they are living while studying, and a tuition fee loan of up to £9,250 for each year of their PGCE course. Other grants are available for those with dependants. If a student chooses to study part time their support will be pro-rated.

The committee will wish to note the below HESA data regarding the undergraduate population from AY2021/22; undergraduates are the recruitment pool from which PGCE secondary subject specialists are recruited from. A degree is required to become a qualified school teacher.

Note that subject of study and module subject differ and are therefore not comparable. More information is available on this in Section B of [Welsh Language in Higher Education, 2021/22 \(gov.wales\)](#).

**Welsh domiciled undergraduates by country of provider and subject of study  
(AY2021/22)**

	<b>Wales</b>	<b>Other UK</b>	<b>Total UK</b>
Medicine and dentistry	930	1,240	<b>2,170</b>
Subjects allied to medicine	9,060	3,130	<b>12,190</b>
Biological and sport sciences	3,450	1,640	<b>5,090</b>
Psychology	4,500	1,210	<b>5,710</b>
Veterinary sciences	100	350	<b>450</b>
Agriculture, food and related studies	430	470	<b>900</b>
Physical sciences	1,040	1,045	<b>2,085</b>
Mathematical sciences	600	550	<b>1,150</b>
Engineering and technology	3,350	1,795	<b>5,145</b>
Computing	3,670	1,000	<b>4,665</b>
Architecture, building and planning	885	650	<b>1,530</b>
Geography, earth and environmental studies (natural sciences)	725	515	<b>1,240</b>
<b>Total Science</b>	<b>28,735</b>	<b>13,595</b>	<b>42,325</b>
Social sciences	7,735	2,680	<b>10,415</b>
Law	4,095	1,355	<b>5,450</b>
Business and management	5,465	2,660	<b>8,120</b>
Language and area studies	1,675	1,060	<b>2,735</b>
Historical, philosophical and religious studies	1,340	1,000	<b>2,345</b>
Education and teaching	3,785	675	<b>4,460</b>
Combined and general studies	3,265	140	<b>3,405</b>
Media, journalism and communications	655	525	<b>1,185</b>
Design, and creative and performing arts	3,220	3,340	<b>6,560</b>
Geography, earth and environmental studies (social sciences)	140	130	<b>265</b>
<b>Total Non-Science</b>	<b>31,375</b>	<b>13,565</b>	<b>44,940</b>
<b>Total</b>	<b>60,110</b>	<b>27,160</b>	<b>87,270</b>

*Source: HESA Student and Student Alternative records via Welsh Government*

**Notes:**

Numbers based on enrolments for students who are:

1. In the Standard Higher Education registration population
2. Of Welsh domicile
3. Studying at Undergraduate level

Numbers are rounded to the nearest 5

Numbers may not sum to totals due to rounding

Figures calculated based on the full person equivalent (FPE). This means that if a student on a course studies more than one subject, the course is apportioned between those subjects. For example, a student studying 0.5 Business studies and 0.5 French will be counted as 0.5 FPE in Business & administrative studies and 0.5 FPE in Languages.

**Data for subject of study (or course subject) and module subjects differ. Figures for the two should not be compared.**

Welsh domiciled undergraduates in Wales by provider and Welsh speaker status (AY2021/22)

	Fluent Welsh speaker	Welsh speaker not fluent	Not a Welsh speaker	Unknown	All	% who are fluent Welsh speakers	% who are non-fluent Welsh speakers
<b>Higher education institutions</b>	<b>7,840</b>	<b>7,995</b>	<b>36,350</b>	<b>6,795</b>	<b>58,980</b>	<b>15%</b>	<b>15%</b>
<i>Aberystwyth University</i>	655	420	1,015	20	2,115	31%	20%
<i>Bangor University</i>	1,115	420	1,465	0	2,995	37%	14%
<i>Cardiff University</i>	1,400	1,225	5,365	10	8,000	18%	15%
<i>Cardiff Metropolitan University</i>	685	690	3,485	60	4,915	14%	14%
<i>Swansea University</i>	1,215	1,210	4,885	0	7,315	17%	17%
<i>University of Wales Trinity St David</i>	835	990	4,575	115	6,510	13%	15%
<i>University of South Wales</i>	1,010	1,310	7,815	105	10,235	10%	13%
<i>Wrexham University</i>	290	500	2,155	65	3,010	10%	17%
<i>Open University</i>	640	1,225	5,595	6,425	13,880	9%	16%
<b>Further education institutions</b>	<b>315</b>	<b>220</b>	<b>585</b>	<b>10</b>	<b>1,125</b>	<b>28%</b>	<b>15%</b>
<i>Gower College Swansea</i>	10	5	30	0	50	26%	15%
<i>Grwp Llandrillo Menai</i>	275	190	435	0	900	31%	21%
<i>NPTC Group</i>	25	20	120	5	180	16%	13%
<b>All enrolments</b>	<b>8,155</b>	<b>8,215</b>	<b>36,935</b>	<b>6,805</b>	<b>60,110</b>	<b>15%</b>	<b>15%</b>

[Source: HESA Student record via Welsh Government \[View the data\]](#)

Notes:

Numbers based on enrolments for students who are:

1. In the Standard Higher Education registration population
2. Of Welsh domicile
3. Studying in Wales (including the Welsh national centre of the Open University)
4. Studying at undergraduate level

Numbers are rounded to the nearest 5

Numbers may not sum to totals due to rounding

Percentages calculations are based on the students whose Welsh speaker status is known.

This means that students with unknown Welsh speaker status are excluded from calculations.

**Undergraduate students in Wales by HECOS module subject and Welsh medium teaching status (2021/22)**

	Some teaching through Welsh	No teaching through Welsh	Percentage with teaching through Welsh (%)
Medicine and dentistry	250	2,810	8%
Subjects allied to medicine	850	10,755	7%
Biological and sport sciences	275	9,145	3%
Psychology	130	6,035	2%
Veterinary sciences	0	85	0%
Agriculture, food and related studies	115	640	15%
Physical sciences	5	3,020	<1%
Mathematical sciences	35	2,410	1%
Engineering and technology	130	7,385	2%
Computing	150	6,035	2%
Geography, earth and environmental studies	45	2,735	2%
Architecture, building and planning	40	1,755	2%
Social sciences	695	11,790	6%
Law	210	7,210	3%
Business and management	380	13,260	3%
Media, journalism and communications	135	1,525	8%
Language and area studies	265	5,200	5%
Welsh studies	240	10	96%
Other Celtic Language	10	15	37%
Other European Language	5	1,560	<1%
Historical, philosophical and religious studies	160	2,875	5%
Design, and creative and performing arts	895	4,885	15%
Drama	145	515	22%
Music	5	900	1%
Cinematics and photography	110	655	14%
Education and teaching	725	3,475	17%
Teacher Training	150	470	24%
Studies in Education	575	3,010	16%
Combined and general studies	135	1,725	7%
<b>All Subjects</b>	<b>5,630</b>	<b>104,755</b>	<b>5%</b>

[Source: HESA Student record via Welsh Government \[View the data\]](#)

**Notes:**

Numbers based on enrolments for students who are:

1. In the Standard Higher Education registration population
2. Studying in Wales (including the Welsh national centre of the Open University)
3. Studying at undergraduate level

Numbers are rounded to the nearest 5

Numbers may not sum to totals due to rounding

Subjects reported in Full-Person Equivalents (FPE) split each student across the module subjects they study. If half a student's modules were Maths modules, and half were law modules, they would count as half a student (0.5) studying Maths and half a student studying Law. Once a student's subjects are calculated in FPE, we check if any part of a subject was studied through Welsh. This means if half a student's course is Maths (0.5 FPE), and they study some Maths through the Welsh-medium, then they also count as half a student studying Maths through Welsh (0.5 FPE).

**Data for subject of study (or course subject) and module subjects differ. Figures for the two should not be compared.**

### c. Initial Teacher Education

Welsh Government considers high quality ITE that is fully engaged with the wider education sector an important factor to attracting graduates and ensuring a supply of new teachers into the teaching profession. The reformation of the ITE system in Wales was implemented following the [Teaching Tomorrows' Teachers](#) report. This reform was supported by other interconnected and interdependent reforms including new professional standards, our new curriculum, and changes to student finance.

The [Criteria for the accreditation of ITE programmes in Wales](#) (the 'criteria') set out a model whereby both schools and HEIs have their equal part to play in offering the balance of theoretical and practical input to ensure a high-quality experience for our future teachers. These partnerships extend to schools being an equal partner in the initial development and ongoing quality assurance of their ITE programmes, staff training, and recruitment strategies and activities. Promising teacher preparation (ITE) practices highlighted under the OECD's [Flying Start report](#) highlighted our approach to recognise 'schools as an important partner in the design and delivery of initial teacher education programmes and the creation and use of research' as a strength.

It is important to note the reformed and increased role of schools in Wales' ITE system. The ITE Partnership arrangements between schools and universities support a system that is self-improving with the profession working for its own improvement and for others. Schools within Wales ITE Partnerships are responsible for, and are a vital component of, ensuring ITE student teacher recruitment nationally.

As part of the ITE reforms the Welsh Government procured and continues to support the pan-Wales alternative ITE routes. The Open University (OU) won the contract and developed the [Salaried PGCE](#) and the Part-time PGCE. These PGCE's are intended to support graduates wishing to enter the teaching profession who would not otherwise be able to via 'traditional' full-time PGCE (such as career changers, parents/adult-carers, those from low-income households/backgrounds, and those living in rural areas unable to access a regional university). Both PGCEs have been available since AY2020/21 and analysis undertaken by the OU on their student teachers indicates that they are a unique cohort, representing additional student teachers studying to become a teacher that would not have otherwise been able to do so. The secondary subjects available have been expanded several times in recognition of evidenced demand from applicants and schools and the priorities of Welsh Government. Except for modern foreign languages (and the inclusion of English and Primary) all priority subjects including the sciences can be studied via the Part-time PGCE or Salaried PGCE. Student finance (see section 5b) is available to student teachers studying the Part-time PGCE and we have committed to supporting the student teachers and their employing schools on the Salaried PGCE via grant funding for a further three academic years (2024-25 to 2026-27). This includes the cost of their PGCE, and a level of salary contribution provided to support their employing schools.

We remain committed, that all student teachers, **regardless of ITE route taken, are entitled to, and receive high quality ITE that prepares them to enter the teaching workforce.** All ITE programmes in Wales that award qualified teacher status (QTS) are held to the same high standards via our [evidence informed](#) regulatory framework (see also Welsh Journal of Education: [Furlong, 2016](#), and [Furlong, 2020](#)). This protects against a two-tier workforce and ensures properly prepared, high-quality teachers in Wales' schools.

#### d. Early career support and professional learning

There is growing recognition that supporting teachers' professional learning from the beginning to the end of their career is critical to fostering high-quality teaching.

Ensuring all practitioners have access to guaranteed career-long professional learning is integral to our vision for education in Wales to ensure that practitioners are supported to develop throughout their careers and remain within the profession.

Newly qualified teachers are supported during their first year of teaching with a funded mentor and a professional learning programme to provide the support they need as they embark on their careers. As part of our early career support package, we also fund a National Masters in Education (MA) for up to 200 individuals per year. I also recently announced the launch of the National Doctorate in Education (EdD) which will be available from January 2025. Together these provide an accredited academic pathway for our practitioners.

The National Professional Learning Entitlement, launched in September 2022, aims to ensure that all practitioners have access to [quality professional learning](#) to enable them to deliver high standards and aspirations for all learners. We continue to provide a total of 6 INSET days and the professional learning grant, worth £12m per annum, to support schools to enable practitioners to engage with professional learning.

#### e. Teacher Professional Identity

We are currently engaging with OECD on a global [new professionalism research study](#), to inform our ambitions for the future of teaching in Wales. In conjunction with wider research, OECD findings will provide opportunities to raise the profile of teaching as a career, support teacher and teaching assistant retention in schools and settings and positively impact on the experiences of learners as a direct result.

The Curriculum for Wales also presents an opportunity to change perceptions and raise the profile of teaching. This fundamental change not just to what we teach, but how we teach and the understanding of why we teach it, offers a new opportunity to inspire the next generation of teachers to join the profession. The ways of working that underpin the curriculum – teacher creativity, agency, and leadership at all levels – also have the potential to encourage more into the profession. We will continue to showcase what practitioners in Wales are achieving and how they are supporting their learners to reach their potential through the Curriculum for Wales.

#### f. Teachers' Pay

For teachers' pay and conditions in Wales there is an agreed annual process in place involving a combination of social partnership and independent expertise from the Independent Welsh Pay Review Body (IWPRB). We are fully committed to these social partnership structures and the established process for deciding on teachers' pay and conditions in Wales and continue to address any issues and concerns through our social partnership network with a view to making the teaching profession in Wales an attractive environment which will encourage and support recruitment into the profession.

By taking a social partnership approach and our commitment to 'no detriment' for teachers, we support the teaching profession by ensuring their pay, terms and conditions are designed to best suit the profession here in Wales and currently provide higher salaries and allowances for both new and more experienced teachers than in England.

The agreed annual process has also allowed us to introduce some key changes requested by the profession to further improve the teachers' pay system over the last 4 years. Positive changes have included the reintroduction of pay portability and removal of performance-based pay progression. Last year, we also removed the strict pro-rata principle for TLR allowances making these allowances more accessible and much fairer for part time teachers.

Moving forward, the IWPRBs Strategic Review and recommendations into Teachers' Pay and Conditions was published via a written statement on 9<sup>th</sup> April 2024 and discussions with stakeholders on the report and recommendations are ongoing. The annual process for Teachers Pay for AY2024/25 is also currently ongoing and will provide us with further opportunities to develop a more distinct national system here in Wales that not only improves and enhances the system but is also fairer and more transparent for all teachers

#### g. Teacher Wellbeing

Recognising the inextricable link between workload and well-being, we are funding Education Support for the fourth consecutive year. Education Support is a charity with decades of expertise in supporting the education workforce with their mental health and well-being. The wide range of support that Education Support provides includes free advice and support for schools across Wales; bespoke mental health and wellbeing support via their School Wellbeing Service; webinars and workshops; peer to peer support; resilience training, and a dedicated website which has its own range of resources, many of which are accessible in Welsh. Details can be found on the Education Support [Teachers Hub](#).

In March 2021 we published the [Framework on embedding a whole school approach to emotional and mental wellbeing](#). The framework is statutory for all maintained schools and local authorities and is aimed at the needs of school-age learners and the workforce which supports their learning. It seeks to create a supportive environment where young people are encouraged to fulfil their personal and academic potential, where they thrive, learn and emotionally develop, supported by teachers who operate in a culture that equally values their own well-being.

#### h. Teacher Workload

We recognise the pressures facing education staff, the inextricable link between workload and wellbeing and that workload is cited as one of the main reasons for leaving the profession. During this last year in particular, by taking a social partnership approach, we have undertaken sustained engagement and worked constructively with our key stakeholders, including leadership and teacher unions, to identify and tackle the causes of workload and bureaucracy.

We have restructured and refocused our engagement arrangements with partners around the new, independently chaired, Strategic Workload Coordination Group (SWCG). The SWCG oversees all issues linked to reducing workload and bureaucracy in schools to ensure a consistent and achievable approach. Underpinning this are three working groups focussing on finance; reporting and engagement; and policy development and implementation. All working groups are independently chaired by representatives of our key stakeholders and each group has an action plan, with key deliverables and targets, looking at the particular causes of workload pressure in these areas and focussing on what action can be taken to make tangible change which will reduce burden.

We will continue to work collaboratively and at pace to deliver these practical changes. This includes direct action by Welsh Government as we continue to work internally and with our key stakeholders in developing our workload impact assessment. This considers the potential impact of workload on education staff of any new Welsh Government policies.

By taking this action and continuing to work in partnership, we want to make a real impact at school level, reduce burden and create space for teachers to teach.

**Pwyllgor Diwylliant, Cyfathrebu, y Gymraeg,  
Chwaraeon, a Chysylltiadau Rhyngwladol**

**Culture, Communications, Welsh Language,  
Sport, and International Relations  
Committee**

Buffy Williams MS  
Chair  
Children, Young People and Education  
Committee

**Senedd Cymru**

Bae Caerdydd, Caerdydd, CF99 1SN  
SeneddDiwylliant@senedd.cymru  
senedd.cymru/SeneddDiwylliant  
0300 200 6565

**Welsh Parliament**

Cardiff Bay, Cardiff, CF99 1SN  
SeneddCulture@senedd.wales  
senedd.wales/SeneddCulture  
0300 200 6565

13 September 2024

**Welsh Language and Education (Wales) Bill**

Dear Buffy

Thank you for your letter (dated 5 August 2024) and for hosting the Committee at a recent Welsh Government briefing on the Bill.

Following a discussion on 17 July 2024, the Committee agreed that Heledd Fychan MS and Lee Waters MS would participate in your evidence sessions for Stage 1 of the Bill.

I look forward to the continued joint-working between the two committees.

Yours sincerely



**Delyth Jewell MS**  
**Committee Chair**

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

# Agenda Item 7

By virtue of paragraph(s) vi of Standing Order 17.42

Document is Restricted