On behalf of the National Children’s Charities Policy Group, which is chaired and facilitated by Children in Wales, we welcome your inquiry into the impact of COVID-19 on children and young people, and wish to offer a list of some of the initial issues which have emerged following Government guidelines, school closures and moves towards services working remotely.

This is being submitted in advance of more detailed submissions from individual organisations in respect of some of the issues identified.

1. **Context**

1.1 The impact of COVID-19 on children, young people and families in Wales has been profound and unprecedented. Some children are disproportionately more at risk than others, due to their characteristics, their status or through disadvantage owing to poverty. Many previously vulnerable children will have become more vulnerable and at greater risk, whilst families previously ‘getting by’ and above the vulnerability threshold for service support and intervention, will have found their needs increased and their wellbeing compromised.

1.2 Social distancing and social isolation will have a particular effect on children and young people, and we therefore consider, in line with the UNCRC, that special attention should be given to children in all decisions affecting them.

1.3 Government policy and practice responses must both take account of
a) Children in the here and now, and
b) Children when current restrictions are relaxed and lifted.

1.4 We have particular concerns around the visibility of vulnerable children, and the additional barriers they are facing, placing them at increased risk. We welcome the statement issued by Welsh Government in respect of vulnerable children and the creation of a vulnerable children working group.
1.5 We also welcome the urgent steps Governments and public bodies have taken to provide for, and safeguard children and young people, through for example announcements in respect of Free School Meals, guidance to inform the delivery of children’s social care services and recent pledges to address digital exclusion.

The following is a snapshot of the issues which have emerged over previous weeks since restrictions on movement, social distancing and school closures came into force.

2. Children’s Rights
There is a legal requirement for Ministers to pay close attention to the interests of children in the management of Covid-19 as a consequence of the duty to have due regard to the UNCRC under the Rights of Children and Young Persons (Wales) Measure 2011. While we fully appreciate that the speed with which initial guidance, regulations and announcements were made may have limited the scope to undertake Child Rights Impact Assessment we believe that subsequent guidance and functions of Ministers should be subject to the Impact Assessment process.

3. Access to education & support for learners
We welcome the steps which Welsh Government have taken to safeguard pupils and to provide learning opportunities through schools and early years settings. The issues we wish to raise are

- That some children are not able being enabled to engage in education and are at risk of falling behind their peers. We are particularly concerned by the low numbers of vulnerable children accessing education opportunities.
- We are aware that the ability of some parents to be able to support their children’s learning due to low levels of adult literacy, time, capacity and resources is limited.
- There are additional barriers for children attending Welsh Medium education with non-welsh speaking parents in their household.
- There is a lack of resources in some homes for parents to engage children in creative play, craft and home learning opportunities e.g. availability of stationary and printers.
- We are concerned about the final grades of children presently struggling to complete assessed work at home.
- We have concerns in relation to young people in year 11 transitioning to further education without having fully completed year 11 and without the usual support.
- Discussions around reopening schools and supporting children’s learning are focused on school-aged children and support for schools,
with little recognition that younger children are also at risk of falling behind. We are particularly concerned about two-to four-year-olds, as this is a key point in children's development.

- Any measures to support children back into education must include children in the early years, alongside school-age children.

4. **Care experienced young people**

We welcome the Guidance issued by Welsh Government, and note the increased activities underway to engage and support the wellbeing of care experienced young people at this time. The issues we wish to raise are

- The increased risk of breakdown of foster care placements
- The increased risk of care experienced children going missing
- Support arrangements for children placed out of county
- The impact of the transition from face to face engagement to remote engagement
- Accessing Personal Advisors has been disrupted and has not been consistent
- Inconsistency in the number of referrals for advocacy services across regions
- Any changes brought about through recently published guidance and the relaxation of existing legislation should be subject to on-going monitoring, evaluation and review.

5. **Young carers**

We welcome the inclusion of Young Carers as a vulnerable group in recent Welsh Government guidance. The issues we wish to raise are

- Young Carers are particularly vulnerable and under additional pressure due to their caring responsibilities, and may suffer additional trauma, and possible grief and loss, due to COVID-19
- That the process of being offered a childcare place at school, is challenging due to the difficult selection panel process that have to get through. This then creates a time delay from a lengthy referral form being submitted to weekly panel, to then a letter being sent to family offering place and then the family having to complete a booking form and go through the booking process.

6. **Digital Inclusion**

We welcome the recent announcement and funding by the Minister for Education, in ensuring that schools can provide digital devices to children. Some of the points below may well be addressed by this in time. The issues we wish to raise are
• The lack of access to on-line devices and other internet infrastructure to engage with on-line learning tasks provided by schools is raising concerns about children falling behind their peers
• Some children are having to share sole devices with parents and siblings, causing tensions
• The disproportionate impact on low income families
• A barrier to maintaining contact with family, friends and social networks
• A barrier for services in being able to carry out visual welfare checks with children and for children to be able to access mental health support independently
• There is a need to monitor and evaluate the additional support now being offered by the recent Welsh Government announcement, to ensure that digital devices are reaching and aiding young people as intended
• There is a need to ensure that ongoing technical support is available as part of this new digital offer for children.
• Geographical differences in effective infrastructure to access the internet are barriers for some young people

7. Safeguarding and abuse
We welcome the recent Welsh Government statement setting out 5 ways in which children and young people can stay safe during the COVID-19 lockdown, emphasising that home is not a safe place for every child and the advice services still available. The issues we wish to raise are
• The decrease in the number of child protection referrals made and that some vulnerable children are not being seen by professionals.
• Services concerned that they are not able to visually see some children to check on their welfare, and therefore not able to ensure that children are not at any additional risk
• The increasing number of children and adults accessing help and advice lines
• The increased risk of abuse of children in unsafe home environments
• The increase in physical and emotional abuse being reported by helplines
• The pressure being brought to bear on already difficult family relationships and the emotional impact on children and young people as a consequence of the lockdown

8. Emotional and mental health
The impact of huge societal changes over a short period of time cannot be underestimated. There is an increase in the number of children and young people contacting helplines with concerns about their emotional and mental
health and with suicidal thoughts and feelings. We are concerned that children and young people are struggling with emotional and mental health problems at home and are reluctant to seek support from services and unsure how to access that support. When schools resume and communities start to come out of lockdown, mental health services will need to be ready for a surge in demand. More holistic and universal responses to address the needs of children and young people and their families will be required. The agility of third sector services in reaching out and adapting to presenting need has been acknowledged during the crisis months. There is potential to further harness this important resource as we emerge from the crisis and meet the challenges that children, young people and families bring. The issues we wish to raise are

- We are hearing that children and young people have reduced support for their existing mental health conditions
- An increase in emotional distress for those that already suffer from mental health problems such as anxiety and depression
- Loneliness and isolation has increased amongst some children due to school closures and not being able to physically maintain links with their peers and family/social network
- Some concerns around the amount of time children are spending online
- Access to school counselling services now that schools have closed
- Some children will be experiencing grief, loss and trauma during this period due to bereavement. The impact of this can be long lasting if the right support is not made available now and into the future.
- Concerns that some children may not be accessing support and help despite increasing levels of need

9. Child poverty & families at risk of poverty
Many children in low income families were disproportionately struggling compared to their peers prior to COVID 19, with the pandemic exasperating previous challenges as well as pushing more families into financial difficulties. The issues we wish to raise are

- Reduced household income and increased financial pressures on families due to the economic downturn, loss of employment and reduction in salaries (including for those subject to the UK Job Retention Scheme). Likely to be an increase in unemployment when this much needed scheme comes to an end.
- Increase in the number of families accessing Universal Credit and other benefits, and the delay in receiving payments
- Whether families claiming UC for the first time are being sufficiently signposted to other forms if income they can claim e.g. DAF, FSM
• Additional pressures placed upon families already struggling due to on-going debt
• Childcare considerations after lockdown should be planned for now. As well as continuing to support key workers, childcare should be prioritised for low income families and those in greatest need, some of whom will be returning to work sooner than other parts of the population.
• Welcome the additional investment in the Discretionary Assistance Fund (DAF) but the promotion of the scheme could be enhanced, to ensure that more families in hardship are aware of the additional financial support available during this crisis. Promotion should be prioritised through, for example existing information channels for parents and through schools.
• Pressure on families in relation to payments for utility bills including access to broadband and housing costs
• An increase in the numbers of young people presenting as homeless
• Support increased representation being made to the UK Government in respect of calls for an uplift in the child element of Universal Credit, child tax credits and other welfare benefit entitlements
• Welsh Government should continue work previously underway in considering ways in which some benefits could be devolved to wales in the future
• Continue to implement the new socio economic duty placed on some public bodies taking the lived experiences of children and young people into account
• Take forward the recommendations of the End Child Poverty Network Cymru
• Ensure that all decisions made when current lockdown restrictions are lifted are ‘poverty proofed’. The impact of decision making on children in low income families should be a priority consideration.

10. Food insecurity
Welcome the announcement and funding for Free school meals, including the extension into the summer holidays. The issues we wish to raise are
• We are seeing many families struggling to access food.
• There is a huge reliance on third sector charities to support access to food banks who have seen a huge percentage increase in demand for food parcels for children compared with this point last year.
• The new ways in which families receive cash for school meals should be kept under review. This should include monitoring ways in which families are able to access food, and their ability to prepare and meet the cost of preparing and storing food.
11. Domestic abuse
We welcome the additional investment for domestic abuse services and greater promotion of advice lines to support victims of violence during this period. The issues we wish to raise are

- Services are witnessing greater stress, strain and tensions in the family home which is creating an environment where domestic abuse prevails
- There has been a reported increase in calls to helplines services. There needs to be a clear message that where there are children in these households they too will be victims of domestic abuse, either directly or as witnesses, and that this information needs to be captured and appropriately addressed.
- How will the recent funding announcement by the UK Government be distributed in Wales

12. Online safety
Increased access to the internet presents many opportunities for children and young people, yet also risks and dangers. The issues we wish to raise are

- Internet use is a lifeline, but some children will be groomed and exploited. Parents must be better supported to ensure children are safe online
- We are concerned that vulnerable children and young people are being groomed and criminally exploited as they spend more time online. We have already seen one service user being charged in connection with the supply of class A drugs.

13. Play
The importance and value of play to children should not be disregarded during a period of social distancing and restrictions on interactions between friends and family

- Many parks and playgrounds have been closed to children, limiting their access to play opportunities
- Additional challenges for disabled children in accessing play opportunities make them isolated and potentially vulnerable.
- Announcements around exercising have been predominantly aimed at adult
- No announcement has been made in respect of the importance and value of play, now and for when schools return
- Many services have been able to adapt by opening virtual clubs and sharing resources.
- Whilst some families are being remarkable resilient and creative, others are lacking the necessary parenting skills, space, resources or time to compensate for loss of play opportunities
14. Shared parenting
Children and young people subject to shared parenting arrangements are facing additional hurdles presently. The issues we wish to raise are

- Concerned that many children who are subject to shared parenting arrangements may not be having access to one of their parents or siblings due to restrictions on movement.
- Some services have reported an increase in requests for mediation regarding shared parenting.

Our paper has been an attempt to capture the immediate impact of restrictions placed on children, young people and families during this unprecedented period. We must not however lose sight of the fact that many children already faced challenges, barriers and risk prior to the pandemic emerging.

The post-pandemic response must consider all of the learning which has emerged during this early period to ensure that when restrictions are relaxed and Wales gradually emerges from lockdown, that we create a society which better prioritises the needs and rights of children, and invests in the services which enables them to flourish.