

I write to you ahead of the Children, Young People and Education Committee's scrutiny session of the Deputy Minister for Social Services on radical reform for care experienced children and young people.

NSPCC Cymru welcomes the Committee's report and the clear commitment to listen and make positive recommendations for change for children and young people in the care system and their families. It is particularly heartening to see the extensive engagement the Committee has had with young people, parents and project staff across Wales. We also welcome Welsh Government's commitment to radically transform the delivery of children's services in Wales, as outlined in the Programme for Government.

Despite ongoing work to make this commitment a reality, we feel that there is a need for greater transparency to enable regular scrutiny of progress in this crucial area of work. This is why the NSPCC has been calling for the publication of a detailed, fully resourced roadmap on transforming children's social care, with measurable outcomes. We believe it is crucial to clearly outline what actions the Welsh Government are taking to ensure children are protected and abuse and neglect are prevented from the offset. Children's voices must inform the roadmap and we want to see a young people advisory group set up to monitor delivery and outcomes.

Below are some of the areas we believe must also be addressed as a priority:

#### **Before care**

In our evidence, we called on the Committee to focus on what work needs to be done to ensure safe, nurturing home environments where babies and children grow up with responsive and attuned care-giving relationships, and free from abuse and neglect. We also asked the Committee to explore evidence looking at what preventative approaches have worked best and what can be done to ensure these approaches are maximised. **We therefore particularly welcome Recommendation 8 which calls on the Welsh Government to ensure nationwide access to preventative services such as Barnardo's Baby and Me and to develop a nationwide, long term, sustainable funding model for them. While we are pleased that Welsh Government have committed to reviewing the evaluation of such programmes before deciding on next steps and roll out, we remain of the view that the issue of sustainable, long term funding must be addressed to ensure parity and continued access to support for families across Wales.**

Our response also highlighted the negative impact of poverty on vulnerable families and the increased risk of abuse and neglect for children when families are under intense pressure and are not having their own needs met. We are delighted that the Committee has clearly identified poverty as a driver for family break up. **While we appreciate that some of the levers to alleviate poverty are**

**non-devolved, we are disappointed not to see a clearer call to Welsh Government to do all it can to mitigate the impact of poverty on vulnerable families. We are disappointed that the link between poverty and social care involvement has not been outlined in the draft revised Child Poverty Strategy and would urge Members of the Senedd to continue to call for this.**

In addition, we highlighted concerns about number of babies and infants that are entering care. The Nuffield Family Justice Observatory report *'Born into care'* (2019) shows that disproportionate numbers of infants are appearing in care proceedings compared to any other aged child in Wales. It is also extremely important to protect the mental health and wellbeing of expectant and new parents as research demonstrates that maternal mental health is a crucial determinant of a child's mental health. To reduce the number of infants taken into care, more must be done to develop strong working relationships between health and social care in order to strengthen the pre-birth support available for vulnerable families. There also needs to be more emphasis placed on identifying and addressing perinatal mental health problems within social work pre-birth assessments, with flexible outreach to engage and support mums early. **We urge Members of the Senedd to scrutinise the development of Welsh Government forthcoming mental health strategy, ensuring it accounts for the needs of vulnerable babies and infants who are at risk of going into care.**

### **In Care**

We are pleased that the Committee report placed renewed emphasis on the difficulties care experienced young people encounter when trying to access specialist mental health services across Wales. This is evidenced in our 2019 NSPCC Cymru Listen, Act, Thrive research: all participants talked about how challenging it is for those in care to access CAMHS services because of the high threshold for referral. Many spoke about needing to have a mental health diagnosis or be in 'crisis' before receiving support. They also spoke about long waiting times to access CAMHS and how a young person would be placed at the bottom of the waiting list if they moved placements. Despite the requirement for mental health assessments to be conducted on entry into care, our Listen Act Thrive research also found that assessments are inadequate, guidance is lacking and training for staff is needed. Recent evidence from Care Inspectorate Wales also points to a lack of availability of emotional and therapeutic support for care experienced young people. **This is why we are disappointed that Welsh Government has only accepted in part Recommendation 5 relating to legislation to introduce a statutory right to specialist therapeutic mental health support. We recognise that positive steps are being taken with the introduction of the NEST/NYTH framework but we must see a commitment to regularly review implementation to ensure that care experienced young people can access support when they need it.**

The Committee report rightly highlights the importance of children and young people being heard in the care system. We were pleased to see Recommendations 12 and 13 on a statutory right to advocacy for children, including those in residential care. **It is disappointing that despite the evidence submitted to the Committee, Welsh Government has rejected both recommendations. It is crucial that we see a review of the implementation of the National Approach to ensure that it is delivering on its intention.**

I would be grateful if you would consider raising these points during the session on Thursday,

Yours sincerely

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**NSPCC**