



Buffy Williams MS  
Chair  
Children, Young People and Education Committee

[seneddhealth@senedd.wales](mailto:seneddhealth@senedd.wales)

18 September 2025

Dear Buffy

Thank you for your letter of 17 July and for sharing the detailed correspondence from Cerebra about paediatric continence care.

The issues highlighted in Cerebra's 2025 report, *Inaccessible, Unacceptable and Unaccountable*, about perceived restrictions on continence product provision, the psychological and social impact on children, and the financial burden on families across England, Scotland and Wales are troubling and underscore the need for a compassionate, rights-based approach to continence care.

Following the publication of this report, we have adopted a UK-wide approach to reviewing continence product provision guidance and the issues raised in the report. We have proactively engaged with Bladder and Bowel UK (BBUK) to examine the UK-wide guidance and engage with a cross sector of stakeholders in Wales, regarding the Welsh-specific guidance, to ensure alignment with best practice and legal obligations.

We have also received comments from parents who have been informed by individual services that they are unable to access additional or alternative products, due to interpretations of the guidance despite both the BBUK disclaimer and the Welsh Government guidance clearly stating that product provision should be based on individual clinical assessment. We are working to ensure this principle is consistently understood and applied across services.

The Welsh Government's current guidance, WHC/2022/004, is based on the 2021 consensus document developed by BBUK. This guidance was informed by an expert advisory group comprising clinicians, NHS professionals, and third-sector representatives—many of whom also contributed to the 2017 guidance (WHC/2017/044). The 2017 circular explicitly recognised the need for dignity, individualised assessment, and flexibility in pad provision, and it cautioned against arbitrary limits.

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

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

[Gohebiaeth.Jeremy.Miles@llyw.cymru](mailto:Gohebiaeth.Jeremy.Miles@llyw.cymru)  
[Correspondence.Jeremy.Miles@gov.wales](mailto:Correspondence.Jeremy.Miles@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.

While the 2022 circular aimed to build on this foundation, we acknowledge that its interpretation of the Equality Act 2010 and Human Rights Act 1998 has raised legitimate concerns. In particular, the suggestion that providing night-time products to disabled children could be discriminatory, and the blanket restriction on products for children under five, are being reviewed in light of legal and ethical obligations. Hence the review of BBUK guidance. In parallel, Welsh Government officials have sought feedback from a wide range of NHS professionals, including paediatric continence nurses, community health teams, and health board leads. Their insights are invaluable in shaping practical, implementable guidance which meets the needs of children and families.

We are also working closely with colleagues in the Welsh Government's Disability Rights, Education and Children's Policy teams to ensure our approach aligns with broader commitments to equality, inclusion and children's rights.

The current Welsh guidance references a maximum of four pads per day. This figure was derived from the same advisory group that informed the 2017 guidance, based on clinical norms and service delivery considerations. However, it is important to emphasise that the guidance is exactly that – guidance. It explicitly allows for professional judgement and flexibility based on individual assessment. The intention is not to impose a rigid ceiling, but to provide a benchmark that can be exceeded where clinically justified. We are working with health boards to reinforce the importance of individualised care and professional discretion.

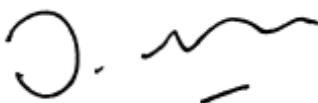
We are committed to the following actions:

- Evaluating the forthcoming BBUK (2025) guidance and considering its endorsement, subject to legal and clinical review.
- Reviewing WHC/2022/004 to ensure compliance with BBUK guidance (2025) equalities and human rights legislation.
- Continuing engagement with stakeholders, including families, clinicians, and third-sector organisations.

As part of the UK and Welsh review, BBUK has explained the rationale behind some of the statements Cerebra found concerning, to their legal representative, who has in turn offered helpful suggestions, which we are adopting. We are also working to streamline the guidance to make it more user-friendly and ensure clinicians can access the key information more easily.

We are grateful for the committee's attention to this important issue and for the powerful testimonies shared by families. We remain committed to ensuring all children in Wales receive the dignified, individualised continence care they deserve.

Yours sincerely,



**Jeremy Miles AS/MS**

Ysgrifennydd y Cabinet dros Iechyd a Gofal Cymdeithasol  
Cabinet Secretary for Health and Social Care