



Comisiynydd Plant Cymru
Children's Commissioner for Wales

Buffy Williams AS,

Cadeirydd Pwyllgor Plant, Pobl Ifanc ac Addysg

Chair of the Children, Young People and Education Committee

8 Ionawr 2025

8 January 2025

Re: Follow up to Annual Scrutiny Session

Annual Buffy,

Thank you for your letter with the additional questions to follow up November's annual scrutiny session.

Please see the responses to the questions as follows.

- 1. The Committee has scrutinised a range of significant education related issues - including curriculum and ALN reforms, school standards, teacher recruitment and retention, pupil absence and peer on peer sexual harassment. We also know the Welsh Youth Parliament are looking at behaviour in schools. To what extent would you say the combination of these education issues could create the 'perfect storm' for compulsory age education that will need addressing in the Seventh Senedd? How concerned are you about these combination of challenges facing education?**

I am very concerned that the challenges outlined are significantly impacting children's experiences of and right to education. I sincerely hope that these issues are effectively addressed during the seventh Senedd, and it is imperative that such challenges are considered by hearing directly from children and young people, as well as through an intersectional lens.

Following the National Behaviour Summit chaired by the Cabinet Secretary for Education in the summer of 2025, I wrote a [position paper](#) outlining my concerns. In this paper, I called for a national listening exercise to hear directly from young people on this topic. Much of the debate to-date has centred around the relatively small minority of learners whose behaviour is complex and unacceptable, but there has

been no systemic capturing of evidence from all learners on the issue. Furthermore, I called for complex behaviour to be viewed as a symptom of a problem, and not the problem itself, and that we must recognise complex behaviours as a multi-faceted issue with a range of root causes and solutions including wider national strategies including Welsh Government's Child Poverty Strategy, the Mental Health Strategy, Youth Work Strategy and the ongoing evaluation of the ALN Act. A holistic approach is a must – this cannot be framed purely as an educational problem for schools to resolve alone, rather it is a whole society challenge that all our national structures should play a part in resolving

My office is currently carrying out work with stakeholders to understand challenges within Emotional-Based School Avoidance (EBSA). To inform this work we have sought advice from Professor Carl Hughes, who spoke at the Behaviour summit, and we have since identified specific cohorts of children and young people who may be more prone to low attendance/EBSA, including children in receipt of FSM, children from Gypsy, Roma, Traveller communities and families of children with ALN.

I was pleased to read the announcement of the review of school governance. As one of my manifesto calls, I had asked that such a review would also consider diversity of board membership and routes to remuneration. Following conversations with the Cabinet Secretary for Education and officials, I was pleased to see these additions included within the scope of this review.

Regarding children with ALN, I am looking forward to the publication of the Audit Wales review with a particular interest in their findings on transparency of funding.

I was present in the Senedd when the Youth Parliament launched their excellent report into Behaviour in Schools and I fully support all of its recommendations. At that event, I was pleased to hear commitment from the Cabinet Secretary for Education to working with Senedd leuencid and my office to take forward this work.

- 2. To what extent are you aware that the wording “boosting standards in schools and colleges” has been removed from the First Minister’s four stated priorities, and do you consider this change to signal a reduced emphasis on educational improvement? This was raised by the Committee of the Scrutiny of the First Minister in a [letter](#) to First Minister and the [response](#) dated 17 September?**

I was not aware of the removal of this wording from the First Minister’s four stated priorities, although I had previously raised with the FM during my annual meeting with her in 2024 that the wording of the four priorities, as first announced in 2024, did not

directly reference children, and so children may not see themselves reflected in the priorities of her government. I felt then and continue to feel that children were not sufficiently foregrounded within the four priorities. I am further disappointed with the evolution of the priority initially called ‘Opportunity for every family’ which had ‘included a focus on boosting standards in schools and colleges to its iteration as presented during the Senedd debate of 15th July 2025 which focused primarily on Homes and Housing and not on Education. Whilst adequate housing is also a children’s rights issue which my office has undertaken work on and flagged during this year, I would welcome greater focus on the importance of educational improvement.

3. Your Annual Report says that your casework included a “high volume of concerns” about social services, particularly placement breakdowns, delays in assessments, and access to advocacy for children in care. How would you assess the impact of our Committee’s scrutiny on the radical reform of support for care experienced children. Has anything changed since our report was published in 2023?

I welcome the scrutiny that the Committee has provided on arrangements for children’s social care during this Senedd. The ‘If Not Now, When?’ report, published in 2023, was a landmark piece of work that set out bold recommendations to reform children’s social care in Wales and to ensure that Welsh Government’s commitments in its Programme for Government were realised. A key development that has transpired is the passing of legislation to eliminate profit from children’s social care. This was a key call of mine, and it is welcome that work is underway to implement the policy.

Since the publication of the ‘If Not Now, When?’ report, I also welcome the consultation and proposed changes to the Part 6 Code of Practice to the Social Service and Wellbeing (Wales) Act 2014. We undertook work with a group of care-experienced young people – the Hope Group – and developed recommendations for Welsh Government, particularly on enabling young people to participate in the packing of their personal belongings and including young people in their own care meetings. Their recommendations are included in the impact report produced by my office [here](#). It is welcome that these recommendations will be addressed in the proposed changes to the code of practice.

I should also acknowledge that policy change can take time, and that the Committee has continued to scrutinise Welsh Government on the matter of reforming children’s

social care since its 2023 report was published. However, issues persist that should be brought to the Committee's attention and that the next Welsh Government needs to address.

Data from our Advice and Assistance Team show that issues relating to social services accounted for around a quarter of all issues raised with our Advice and Assistance Service between April 2024 and March 2025. The largest category within social services-related enquiries was complaints, which made up 38% of all issues. These complaints most commonly came from parents who felt dissatisfied with the service they received from children's services departments, including a lack of communication, delays in decision-making, or feeling that their concerns were not taken seriously. Many families described feeling "pushed from service to service," and struggling to get clarity about what help their child was entitled to or when actions would be taken.

Concerns about placement stability represented 11% of social services issues. These cases included children experiencing multiple placement breakdowns, children being moved with very little notice, or situations where families were worried about the suitability of a placement. These cases are typically complex and involve coordination between several agencies. We continue to see the emotional toll these disruptions take on children and young people.

Other categories included:

- Funding decisions (5%) – often relating to financial support for kinship carers, access to support packages, or disputes about responsibility between teams.
- Safeguarding (6%) – usually where parents felt safeguarding concerns had not been taken seriously or where communication about safeguarding processes was unclear.
- Provision of services (8%) – where families reported delays in receiving support, limited availability of services, or high thresholds preventing access.
- Smaller proportions related to advocacy (4%), child protection concerns (2%), and assessment issues (1%).

Taken together, the data highlight a pattern of children and families experiencing delays, uncertainty, and inconsistent communication.

It is also useful to consider this with the previous years since the 'If Not Now, When?' report's publication. Data from our Advice and Assistance Team show that Social Services accounted for 28% and 29% of our casework in 2022/23 and 2023/24

respectively, and that some issues within our Social Services casework have remained similar in number, particularly complaints and the need for advice. This tells us that, unfortunately, issues remain for children and families and a lack of significant improvement since the 2023 report remains the case. Whilst I reiterate my acknowledgment that the impact of policy change can take time to materialise, as well as my thanks to the Committee for its work on this area during this Senedd, I urge the Committee to continue its scrutiny and ensure that the next Welsh Government prioritises children's social care and brings about the improvements needed to care and support for care-experienced children and young people.

It is also disappointing that there has been inaction on Welsh Government's part to put to work some of the "If Not Now, When?" recommendations that it accepted, albeit partly. For example, the Committee recommended that all care leavers should have access to a personal advisor up to the age of 25 (as we called for in our 2016 [‘Hidden Ambitions’ report](#)), and that a review of the When I'm Ready scheme should take place. Welsh Government accepted both recommendations in part, but the review of the When I'm Ready scheme has not taken place, and although some care-experienced young people up to the age of 25 have access to a Personal Advisor, they are young people who are in education or training, meaning that not all care-experienced young people, up to the age of 25, have access to a Personal Advisor. It is crucial that the age limit for accessing holistic support for care-experienced young people is extended to 25, so as to ensure that they receive the support that they need as they transition to independent living and that they are able to access opportunities that are available to their peers who are not care-experienced. The next Welsh Government must fulfil this work, and the Children, Young People and Education Committee must continue its work of scrutinising government and ensure that its commitments to care-experienced children and young people are fulfilled.

4. Transport is an issue which has arisen in several of our inquiries and your Manifesto for the Senedd Elections calls for free public transport for under 18s and also for a full review of the Learner Travel Measure 2008 and associated guidance. What's your assessment of how the current £1 fares pilot is going? To what extent will this address some of the learner travel issues that you deal with?

I welcome the introduction of the pilot. As reflected in my [manifesto](#): *“Young people across the whole breadth of Wales raise the prohibitive costs and poor availability of public transport with us at every turn. They feel let down, unable*

to get to school or college safely and on time, and prevented from socialising with friends, seeing family members, or attending clubs and leisure activities.”

The manifesto calls for:

- Expanding upon the current £1 fares pilot, to provide free public transport (to include bus and rail travel) for under 18s.
- Undertaking a full review of the Learner Travel Measure 2008 and associated guidance.

Without these changes, children will not have full access to all their rights including access to education, attending health appointments, seeing friends and family, joining clubs and engaging in sport and leisure opportunities. Those from poorer backgrounds will be disproportionately disadvantaged; poorer access to education, health, employment and training opportunities will have life-long and even inter-generational effects. In addition to this, climate targets will not be achieved without a significant change in everyday travel habits, and the worst effects of climate change will impact most severely on the most vulnerable children.

During November 2025, we asked children and young people about public transport. The surveys were a part of an ongoing series of topical questions we ask children and young people monthly to hear their views on a variety of issues, called Monthly Matters. A snapshot summary of the findings can be found [here](#).

The findings from this engagement work indicate that there is more work to be done in raising awareness of the £1 pilot and My Travel Pass. Before doing the survey 70% of respondents were not aware of ‘the new low bus fares for children and young people’. The responses to the survey also highlighted that parents and teachers were not aware of the scheme. There were also concerns raised about broader issues in accessing public transport such as reliability, safety and frequency which requires ongoing work.

While I welcome the pilot, the reduced fares still amount to £3 per day - a monthly cost of approximately £60 - which remains a significant barrier for low-income families. Continued focus on the Learner Travel Measure must remain a priority and should not be conflated with this pilot.

- 5. You have published a Manifesto for the Senedd Elections 2026. What do you see as the absolute priority for legislative change in the first year of the Seventh Senedd?**

I believe the priority for legislative change during the full Seventh Senedd term should be full incorporation of the UNCRC and changes to the way my office is funded in order to fully safeguard children's rights for current and future generations of children and young people. The full rationale for this is set out in my [manifesto](#). However, it is likely that this legislative change will take longer than one year.

Therefore, my priority for legislative change during the first year of the Seventh Senedd would be progressing work support young people's access to transport and education by fully reviewing and amending the 2008 Learner Travel (Wales) Measure. Young people across Wales have consistently raised the prohibitive costs and poor availability of school transport with us through our direct engagement with them. They feel let down and face barriers in getting to school or college safely and on time. We have even heard of some children missing school completely because they cannot afford to get there.

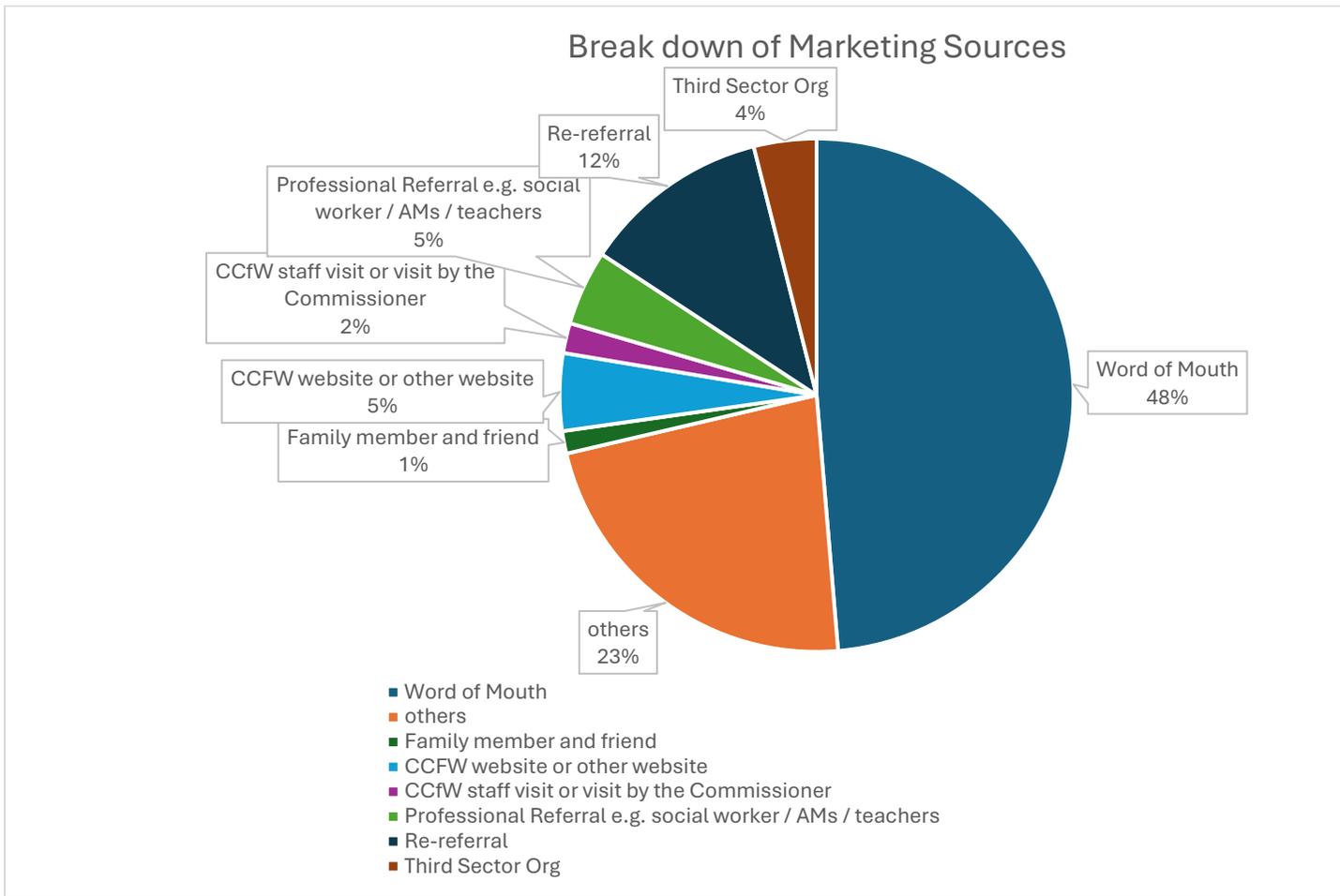
To address this, I am calling for the next Welsh Government to make learner travel more accessible for more pupils, and to do so by reviewing the 2008 Learner Travel Measure, which is currently not fit for purpose. We cannot rely on the policies of individual local authorities to provide more accessible learner travel – change must happen on a national level.

In its recent 2025 progress report on its Child Poverty Strategy, Welsh Government note the Bus Services (Wales) Bill and the accompanying Child Rights Impact Assessment, which “highlighted the importance of affordable, reliable and safe bus travel for children to meet with friends, go to school and attend appointments, and that this can be challenging in more rural areas of Wales.” The progress report also notes the £1 bus pilot “designed to support young people in accessing education, employment, training opportunities and leisure activities.” Although we welcome the pilot, it is a temporary scheme, and it is no replacement for provision placed on a statutory basis. Whilst the pilot is welcome, only changes to the Learner Travel Measure can secure lasting and accessible school transport for pupils. The Bus Services (Wales) Bill presents an opportunity to ensure that changes to bus services in Wales serve children and young people – failing to review the Learner Travel Measure as the provisions of the bill are implemented would be a missed opportunity. I see this as an urgent next step in terms of legislative change during the first year of the Seventh Senedd, but continue to call for all public transport for children and young people to be made free for children up to the age of 18.

The Committee will also know that Welsh Government will undertake a review of safeguarding governance which is expected to be completed by Spring 2026.

Although I wish to avoid preempting the outcome of the review, this is an opportunity to strengthen safeguarding arrangements in Wales, particularly safeguarding arrangements for children. If the review concludes that the strengthening of arrangements is required, such as by establishing a Child Protection Authority, those changes should be put on a statutory basis, so I would welcome legislative activity to that end during the first year of the next Senedd, and I would consider it a legislative priority for the next Welsh Government.

6. There was also an agreement that you would provide statistics to the Committee about how the children and young people who request assistance from your team, first heard about your casework function.



Our data shows that the majority of children, young people and families who contact the Advice and Assistance Service do so through *word of mouth*, which accounts for 48% of all enquiries. This reflects the strong reputation of the service among families and communities, particularly in areas such as ALN and education.

A further 23% of enquiries fall under “other” sources, which includes a range of routes such as community networks and general online searches.

Re-referrals make up 12%, demonstrating that many families return to us for support with new or ongoing issues. This indicates confidence in the service and a positive experience of previous contact.

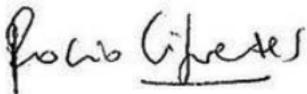
Enquiries arising from third-sector organisations account for 4%, while professional referrals — including from social workers, schools, teachers, or Members of the Senedd — make up 5%.

A smaller proportion, 5%, reach us via the Children’s Commissioner for Wales’ website or other online platforms. A further 2% arise from CCfW staff outreach or visits by the Commissioner, and 1% come through family and friends.

Overall, the data demonstrates that personal recommendation remains the most significant route into the service, with increasing visibility through online and professional channels. This reinforces the value of strengthening both our outreach and digital presence in the coming year.

If you would like any additional information, please let me know.

Yn gywir,

A handwritten signature in black ink that reads "Rocio Cifuentes". The signature is written in a cursive style with a horizontal line under the name.

Rocio Cifuentes MBE

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