



# Comisiynydd Plant Cymru Children's Commissioner for Wales

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## Ymateb i Ymgynghoriad / Consultation Response

**Date / Dyddiad:** 9<sup>th</sup> September 2016

**Subject / Pwnc:** National Assembly for Wales' Children, Young People and Education Committee Inquiry into Youth Work

### Background information about the Children's Commissioner for Wales

The Children's Commissioner for Wales is an independent children's rights institution established in 2001. The Commissioner's principal aim, under the Care Standards Act 2000, is to safeguard and promote the rights and welfare of children. In exercising their functions, the Commissioner must have regard to the United Nations Convention on the Rights of the Child (UNCRC), as stipulated in regulation 22 of the Children's Commissioner for Wales Regulations 2001. The Commissioner's remit covers all areas of the devolved powers of the National Assembly for Wales insofar as they affect children's rights and welfare.

The UNCRC is an international human rights treaty that applies to all children and young people up to the age of 18. It is the most widely ratified international human rights instrument and gives children and young people a wide range of civil, political, economic, social and cultural rights which State Parties to the Convention are expected to implement. In 2004, the Welsh Assembly Government adopted the UNCRC as the basis of all policy making for children and young people and in 2011, Welsh Government passed the Rights of Children and Young Persons (Wales) Measure, which places a duty on Welsh Ministers, in exercising their functions, to have 'due regard' to the UNCRC.

This response is not confidential. I have not responded to every consultation question but only to those of direct relevance to my remit.

Submitted by:

**Professor Sally Holland**

**Children's Commissioner for Wales**

## Introduction

Youth work plays a crucial role in supporting young people to reach their full potential and live fulfilled lives. Through youth work, young people learn about and access their rights outlined in the United Nations Convention on the Rights of the Child (UNCRC), build capacity and resilience, and have access to experiences enabling them to gain confidence and competence which help to prepare them for adulthood.

My response focuses on:

- the need to update fourteen year old statutory guidance to incorporate more recent legislation and provide an overarching framework for youth work policy;
- the strengthening of youth work policy sitting underneath statutory guidance;
- cuts to youth work in Wales;
- the introduction of Youth Work Sufficiency Assessments as part of Population Needs Assessments; and
- greater involvement of young people and the wider youth work profession in the development of policy and delivery of services.

## Availability for oral evidence sessions

I am attending the Children, Young People and Education Committee on 6 October 2016 and I would be happy to schedule additional time on this date to provide oral evidence in relation to this Inquiry, if required.

**Question 1: What are your views on young people's access to youth work services, including, for example:**

- levels of provision across Wales and any regional variation; and
- issues relating to access for specific groups of young people e.g. language, disability, rurality, ethnicity

It is vital that the needs of young people themselves remain at the heart of youth work provision in Wales. *Extending Entitlement* (2002)<sup>1</sup> stipulates that all young people should have access to universal youth services, in line with children's rights around freedom of association (Article 15 of the UNCRC), goals of education (Article 23 of the UNCRC), leisure, play and culture (Article 31 of the UNCRC), and the provision of services referred to under section 123 of the Learning and Skills Act 2000. However, amidst relentless budget and resource cuts to the youth work sector, youth workers across the UK have reported an erosion of universal youth work provision<sup>2</sup> and early intervention services. Although the National Youth Work Strategy for Wales (2014 – 2018)<sup>3</sup> suggests a balance between open access (universal) and targeted youth work, which is a useful feature on which to build to ensure access of services to all young people, it is my view that further investment is required to uphold this commitment. Along with my counterparts across the UK I have expressed concerns around a lack of investment in and reduced access to local universal services, putting further pressure on services for those most in need. I maintain the need for further investment in universal preventative and early intervention services<sup>4</sup>. Youth work provisions closing within deprived neighbourhoods will leave disadvantaged and vulnerable young people with a lack of opportunities for play,

<sup>1</sup> Welsh Assembly Government (2002) *Extending Entitlement: Support for 11 to 25 year olds in Wales - Directions and Guidance* <<https://www.npted.org/section/youth-service/Downloads/Extending%20Entitlement%20directions%20and%20guidance.pdf>> [accessed on 29 April 2016]

<sup>2</sup> UNISON (2016) *A Future at Risk: Cuts in Youth Services* <<https://www.unison.org.uk/content/uploads>> [accessed on 6 September 2016]

<sup>3</sup> Welsh Government (2014) *National Youth Work Strategy for Wales 2014-18* <<http://dera.ioe.ac.uk/19353/1/140221-national-youth-work-strategy-en.pdf>> [accessed on 4 May 2016]

<sup>4</sup> United Kingdom Children's Commissioners (2015) *Report of the UK Children's Commissioners: UN Committee on the Rights of the Child Examination of the Fifth Periodic Report of the United Kingdom of Great Britain and Northern Ireland* <http://www.childcomwales.org.uk/wp-content/uploads/2016/04/Report-of-the-UK-CCs-UNCRC-Examination-of-the-Fifth-Periodic-Report.pdf> [accessed on 4 May 2016]

access to wider support services particularly early intervention services around mental health, and could lead to young people becoming further marginalised as members of society. Enabling access to high quality youth work services are particularly challenging in rural areas, where transport costs and poverty may be prevalent issues.<sup>5</sup> With numerous youth work provisions reducing<sup>6</sup> or no longer in existence, anecdotal evidence suggests that remaining youth work provisions are uncertain about their future, and the quality and range of youth work provision has therefore become inconsistent across Wales. Through our 'Beth nesa' I What next<sup>7</sup> consultation and through contact with my office from a number of individual young people, I am aware that increasing numbers of young people are finding themselves with limited access to youth work services, are feeling more isolated and have access to fewer opportunities to enable them to live full lives and reach their full potential.

Research from UNISON confirmed that in 180 local authorities across the UK between 2014 and 2016, youth services lost 244 youth centres, on top of the 359 which closed in the previous 2 years, totalling over 600. Almost 98,000 youth service places for young people were cut between 2014 and 2016, on top of the 41,000 which were lost in the previous 2 years, totalling almost 139,000. Around 1660 youth work jobs were lost, on top of the almost 2000 in the previous 2 years, totalling around 3660.<sup>8</sup> The total spend for youth work provision in 2014-15 was £35.5 million across these 21 local authorities, a decrease of 14% compared with 2013-14.

I believe that reduced levels of youth work services have led to the youth work workforce becoming decreasingly preventative and less able to engage with young people within their areas. This is of particular concern given the propensity of the youth work sector in accessing those vulnerable and 'hard to reach' young people, who may be disengaged from other types of provision or sectors.

I am well aware that there is an ongoing dialogue across the youth work sector about aspects of the current position of youth work services and links between youth work services and youth support services, as well as an openness to work collaboratively to better meet young people's needs<sup>9</sup>, evolving the delivery methods of youth work whilst ensuring that youth work values are not diminished. It is my view that a comprehensive picture of current provision, and the risks to the sustainability of such provision, is vital in understanding the extent of issues in relation to young people's access to youth work services. I have previously stated that the proposed outcomes chart within Welsh Government's *National Outcomes Framework for Youth Work*<sup>10</sup> is unable to provide the data and analysis necessary to determine the availability of youth work across Wales.

**If you believe that there are particular problems, how do you think they could be resolved?**

I have previously called for Youth Work Sufficiency Assessments<sup>11</sup> to effectively assess the availability of youth work provision across both statutory and voluntary sectors, to ensure that youth work services are appropriately resourced to deliver positive outcomes for children and young people across Wales. Although such assessments would not guarantee improved outcomes for young people, they would provide a positive contribution in a similar manner to existing Play Sufficiency Assessments across Wales. Youth Work Sufficiency Assessments would support a fuller understanding of what steps need to be taken to provide

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<sup>5</sup> Wylie, T. (2016) *Developing Youth Work in Wales* <<http://gov.wales/docs/dcells/publications/160318-developing-youth-work-in-wales-en.pdf>> [accessed on 03 May 2016]

<sup>6</sup> UNISON (2016) *A Future at Risk: Cuts in Youth Services* <<https://www.unison.org.uk/content/uploads/2016/08/23996.pdf>> [accessed on 6 September 2016]

<sup>7</sup> Children's Commissioner for Wales (2015) <<http://www.childcomwales.org.uk/wp-content/uploads/2016/04/Overview-English-FINAL.compressed.pdf>> [Accessed on 03 May 2016]

<sup>8</sup> UNISON (2016) *A Future at Risk: Cuts in Youth Services* <<https://www.unison.org.uk/content/uploads/2016/08/23996.pdf>> [accessed on 6 September 2016]

<sup>9</sup> Wylie, T. (2016) *Developing Youth Work in Wales* <<http://gov.wales/docs/dcells/publications/160318-developing-youth-work-in-wales-en.pdf>> [accessed on 03 May 2016]

<sup>10</sup> Children's Commissioner for Wales (2016) *Consultation Response: Welsh Government's National Outcomes Framework for Youth Work*. Available on request.

<sup>11</sup> Children's Commissioner for Wales (2016) *Consultation Response: Welsh Government's National Outcomes Framework for Youth Work*. Available on request.

consistent access to youth work services for young people across Wales. This could also link to a Youth Work offer across Wales which reflects the diverse and changing needs of young people, supporting local authorities and their partners to more effectively coordinate “*the maximum extent of their available resources*” (Article 4 of the UNCRC) to furthering children’s rights and to meeting the statutory duties issued under Section 123 of the Learning and Skills Act 2000, Section 25 of the Children Act 2004 and Section 3 of the Wellbeing of Future Generations (Wales) Act 2015. This would increase the visibility of children and young people in wider budget setting processes and would bring it into line with the obligations laid down by the UN Committee on the Rights of the Child’s *General Comment No. 5 – General Measures of Implementation*<sup>12</sup>.

It is my view that youth work sufficiency assessments should:

- Involve young people in assessing sufficiency of youth work provision;
- Establish a baseline of youth work provision;
- Identify gaps in information, provision, service delivery and policy implementation relating to youth work;
- Support the establishment of evidence to give an indication of progress made in relation to youth work sufficiency;
- Highlight the contribution that youth work can make to the development and delivery of local wellbeing plans as required by Section 39 of the Wellbeing of Future Generations (Wales) Act 2015;
- Highlight opportunities for appropriate collaboration and identify ways of addressing issues relating to partnership working;
- Identify appropriate mechanisms to improve the levels of awareness and knowledge of youth work amongst decision-makers and partners;
- Establish a monitoring system which will involve and improve communication between professions;
- Identify good practice examples; and
- Identify actions for a ‘securing youth work sufficiency action plan’.

Local Authorities and Local Health Boards are now required to undertake Population Needs Assessments which will feed into Wellbeing Assessments under section 39 of the Wellbeing of Future Generations (Wales) Act 2015, to ensure that they provide the services that are required to meet needs in their local area. Children and Young People, People with Disabilities and Carers (including young carers) are all core themes that must be addressed in the Assessment. In addition, the Assessment needs to include preventative services, which contribute towards a reduction in criminal and family proceedings and children committing criminal offences. Although not all youth work is provided by local authorities, it is my view that these Assessments should include Youth Work Sufficiency Assessments mapping the current level of youth work provision from all providers in the local authority area, in order to ensure that any gaps in youth work and support provision are identified and addressed.

I have previously called for child focussed impact assessments of potential cuts to budgets as fundamental to local authorities’ decision making<sup>13</sup> and along with the other UK Children’s Commissioners have called for children’s rights-based analyses of both budget and economic decision-making, processes and outcomes<sup>14</sup>. It is my view that undertaking full Children’s Rights Impact Assessments in relation to local, regional and national budget setting processes would further increase the visibility of children and young people within

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<sup>12</sup> UN Committee on the Rights of the Child (2003) *General Comment No. 5: General Measures of Implementation of the Convention on the Rights of the Child*

<<http://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2fPPRICAqhKb7yhsiQal8gX5Zxh0cQqSRzx6Zd2%2fQRsDnCTcaruSeZhPr2vUevjbn6t6GGSi1fheVp%2bj5Jer1JAcdCHPFRKeD69Ql4JkGsijg4QeTW0QYyXSpJcw> > [accessed on 5 May 2016]

<sup>13</sup> Children’s Commissioner for Wales (2014) *Annual Report 2013-14: Policy and Public Affairs* <http://www.childcomwales.org.uk/wp-content/uploads/2016/04/Overview-English-FINAL.compressed.pdf>

<sup>14</sup> United Kingdom Children’s Commissioners (2015) *Report of the UK Children’s Commissioners’: UN Committee on the Rights of the Child Examination of the Fifth Periodic Report of the United Kingdom of Great Britain and Northern Ireland* < <http://www.childcomwales.org.uk/wp-content/uploads/2016/04/Report-of-the-UK-CCs-UNCRC-Examination-of-the-Fifth-Periodic-Report.pdf> >

wider budget setting processes and would enable proper consideration to the impact that decisions will have on the wellbeing of children and young people.

**Question 2: How effective do you think the Welsh Government strategy and policy on youth work is?**

**In considering this question you may wish to think about:**

- the Welsh Government's specific youth work policy and strategy such as 'The Youth Work offer'; The Wales Charter for Youth Work; The National Youth Work Strategy for Wales 2014 to 2018;
- Welsh Government departmental responsibilities and whether there is a cross-departmental and co-ordinated approach to support youth work provision.

Being fourteen years old, the statutory guidance underpinning youth work, *Extending Entitlement*, does not incorporate or reflect the Rights of Children and Young Persons (Wales) Measure 2011, the Social Services and Wellbeing (Wales) Act 2014, or the Wellbeing of Future Generations (Wales) Act 2015, nor does it fit with the aims of the new curriculum development. There is a need for a coherent set of documents reflecting the UNCRC, the Social Services and Wellbeing (Wales) Act 2014 and the Wellbeing of Future Generations (Wales) Act 2015. This should be underpinned by updated statutory guidance which will act as an overarching framework for other youth work policy documentation. I will go on to discuss how some of the policy documentation sitting alongside this statutory guidance should be improved overall.

While I welcome a clear strategy document to develop youth work across Wales up to 2018, it appears that the provisions under *Extending Entitlement* have been diluted through a lack of join up to documents such as *The National Youth Work Strategy for Wales 2014 – 2018*, *The Wales Charter for Youth Work*, the *National Occupational Standards for Youth Work*, the *Principle and Purposes for Youth Work in Wales* and the *Quality Mark for Youth Work in Wales*, resulting in a lack of a co-ordinated approach to the direction of youth work across Wales.

It is my view that there is a need for greater and more robust strategic co-ordination in relation to youth work in Wales, in relation to specific youth work policy and strategy, as well as that affecting children, young people and families. The need to ensure a consistent and coherent approach to specific youth work is paramount. Effective cross-departmental communication and collaborative working within Welsh Government and with all relevant aspects of the wider workforce is therefore vital in ensuring a co-ordinated approach.

The *Wales Charter for Youth Work* itself is a welcome development in principle. Yet it was disappointing to note that it has been approved without public consultation<sup>15</sup>. I have also raised concerns about the Charter not sufficiently reflecting the perspectives and views and needs of children and young people in Wales and being developed in isolation from existing policy documents informing the sector, including the *National Occupational Standards for Youth Work*, the *Principle and Purposes for Youth Work in Wales* and the *Quality Mark for Youth Work in Wales*.<sup>16</sup> It is my view that the Charter does not provide an effective enough framework 'capable of securing a consistent youth work offer across all parts of Wales.'<sup>17</sup> Provisions within the Charter are ambiguous and do not reflect the challenges facing youth work delivery on the ground, and are not measureable or robust enough in setting out the '*minimum expectation for youth work*'.<sup>18</sup>

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<sup>15</sup> Wylie, T. (2016) *Developing Youth Work in Wales* <<http://gov.wales/docs/dcells/publications/160318-developing-youth-work-in-wales-en.pdf>> [accessed on 03 May 2016]

<sup>16</sup> Children's Commissioner for Wales (2016) *Consultation Response: Welsh Government's National Outcomes Framework for Youth Work* Available on request.

<sup>17</sup> Welsh Government (2016) *Written Statement – The Wales Charter for Youth Work*. [html] Available online at: <http://gov.wales/about/cabinet/cabinetstatements/previous-administration/2016/youthcharter/?lang=en> Accessed on: 12/05/2016

<sup>18</sup> Welsh Government (2016) *Written Statement – The Wales Charter for Youth Work* < <http://gov.wales/about/cabinet/cabinetstatements/previous-administration/2016/youthcharter/?lang=en> > [accessed on 12 May 2016]

I also welcomed the intention to establish a *National Outcomes Framework* for youth work in Wales to more effectively evidence youth work's contribution to the lives of children and young people. I have concerns around the National Outcomes Framework consultation document, and therefore its effectiveness, in relation to the need to:

- Clarify the status and reporting requirements of the proposed National Outcomes Framework for Youth Work;
- Support the youth work sector in Wales to establish a rights-based outcomes framework that appropriately makes use of objective and subjective outcome measures to capture its contribution to improving children and young people's personal, social, physical, emotional and civic development;
- Focus outcome alignment with wider curriculum reform and the Wellbeing of Future Generations (Wales) Act 2015;
- Build on the existing Youth Service Youth Work Audit to co-develop a separate Youth Work Sufficiency Assessment process to determine the availability of youth work provision across localities across local authority and voluntary sector provision; and
- Ensure that due regard has been fully given to children's rights in the accompanying Children's Rights Impact Assessment.<sup>19</sup>

In 2013, my Office called upon Welsh Government "*to ensure that the rights based approach to youth services in line with the UNCRC as presented in Extending Entitlement is not lost*" (p.69)<sup>20</sup>. It is my view that through coherent guidance reflecting the UNCRC, the Social Services and Wellbeing (Wales) Act 2014 and the Wellbeing of Future Generations (Wales) Act 2015, Welsh Government strategy and policy could be substantially improved to effectively communicate how a rights-based approach underpins the co-ordination and delivery of youth work across Wales.

**How do you think the Welsh Government could approach its youth work strategy and policy differently / to better effect?**

I would welcome further clarity around how Welsh Government plans to take the vision of *Extending Entitlement*<sup>21</sup> through to ensure that the rights and entitlements of children and young people are upheld up to 2018. It is my assertion that there is a need for the revision of *Extending Entitlement* as the statutory guidance underpinning section 123 of the Learning and Skills Act 2000 and the provision of youth work in Wales, to bring statutory guidance in line with new legislative requirements as set out in the Social Services and Wellbeing (Wales) Act 2014 and the Wellbeing of Future Generations (Wales) Act 2015. Revising the statutory guidance in relation to youth work will provide an overarching framework which can be put into practice at a local level which takes account of legislative and strategic policy developments over the past fourteen years.

Strong leadership at national government level is required in order to place a greater emphasis on robust strategic co-ordination in relation to youth work in Wales. The approach to youth work should be appropriately structurally maintained, and could effectively be in the form of national professional governing body or association for the youth work profession.

The participation of the wider workforce is paramount in ensuring policy and strategy is produced and embedded in an effective manner. Welsh Government should therefore ensure effective participation in

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<sup>19</sup> Children's Commissioner for Wales (2016) *Consultation Response: Welsh Government's National Outcomes Framework for Youth Work*. Available on request.

<sup>20</sup> Children's Commissioner for Wales (2013) *Annual Report & Accounts 2012-13* <<http://www.childcomwales.org.uk/uploads/publications/400.pdf> > [accessed on 29 April 2016]

<sup>21</sup> Welsh Assembly Government (2002) *Extending Entitlement: Support for 11 to 25 year olds in Wales - Directions and Guidance* <<https://www.npted.org/section/youth-service/Downloads/Extending%20Entitlement%20directions%20and%20guidance.pdf> > [accessed on 29 April 2016]

the development of all youth work related strategy and policy. As I have previously indicated, it is my view that the proposed registration requirements provide a key mechanism to Welsh Government and the Education Workforce Council to co-ordinate further opportunities that allow greater involvement of young people and the wider workforce in strategic decision-making for youth work in Wales<sup>22</sup>.

It is my view that Welsh Government should ensure that the rights based approach to youth services in line with the UNCRC as presented in *Extending Entitlement* is not lost. Welsh Government should ensure that Children's Rights Impact Assessments fully consider due regard in relation to children's rights in specific youth work policy and strategy, effectively communicating how a rights-based approach underpins the co-ordination and delivery of youth work across Wales and how policy and strategy documentation may give greater effect to the UNCRC.

Furthermore, the *Wales Charter for Youth Work* would be more effective if it was reinforced by the creation of a Youth Work Sufficiency Assessment and Annual Action Planning Process, supporting local authorities and their partners to identify how they can more effectively coordinate "*the maximum extent of their available resources*" (Article 4 of the UNCRC) to furthering children's rights and to meeting the statutory duties issued under Section 123 of the Learning and Skills Act 2000, Section 25 of the Children Act 2004 and Section 3 of the Wellbeing of Future Generations (Wales) Act 2015. Doing so would increase the visibility of children and young people in wider budget setting processes and would sit it in line with the obligations laid down by the UN Committee on the Rights of the Child's *General Comment No. 5 – General Measures of Implementation*<sup>23</sup>. Further details regarding the development of a youth work sufficiency assessment can be found in my consultation response to Welsh Government's National Outcomes Framework for Youth Work.<sup>24</sup> To be fully effective the Charter should be articulated and co-ordinated on a local basis, to ensure relevance across Wales.

It is my view that the *National Outcomes Framework* for youth work in Wales would more effectively evidence youth work's contribution to the lives of children and young people by taking actions as detailed above, in relation to:

- status and reporting requirements;
- a rights-based outcomes framework that appropriately captures youth work's contributions;
- aligning outcomes with wider curriculum reform and the Wellbeing of Future Generations (Wales) Act 2015;
- a Youth Work Sufficiency Assessment; and
- due regard being fully given to children's rights through Children's Rights Impact Assessments.

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<sup>22</sup> Children's Commissioner for Wales (2016) *Consultation Response: Welsh Government proposal for the registration of youth workers with the Education Workforce Council for Wales*. Available on request.

<sup>23</sup> UN Committee on the Rights of the Child (2003) *General Comment No. 5: General Measures of Implementation of the Convention on the Rights of the Child*.

<http://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2fPPRiCAqhKb7yhsiQql8gX5Zxh0cQqSRzx6Zd2%2fQRsDnCTcaruSeZhPr2vUevjbn6t6G5i1fheVp%2bj5Jer1JAcdCHPFrKeD69Ql4JkGsjig4QeTW0QYyXSpJcw> [accessed on 05 May 2016]

<sup>24</sup> Children's Commissioner for Wales (2016) *Consultation Response: Welsh Government's National Outcomes Framework for Youth Work*. Available on request.

**Question 3: What are your views on the funding available for youth work, including through Local Authority, Welsh Government, European Union, and Third Sector. If you believe there are problems in this area, how do you think they could be resolved?**

In the climate of austerity, severe budget cuts continue to contribute to the erosion of youth services. It is important, therefore, to ensure consistency and quality for youth work services across the board in Wales and to explore alternative methods of delivery including partnership and collaborative working whilst not diluting the essence of youth work. I note Tom Wylie's views around funding for the sector, which highlight a limited evidence base to attract funding, a funding base too dependent overall on government resources and wide discrepancies in spending of the RSG across local authorities.<sup>25</sup> In 2014-15, Welsh Government statistics confirmed that the core youth service budget across Wales totalled 73% of the Local Government Review Settlement, with 4 local authorities in Wales receiving less than 50% of the Local Government Review Settlement.<sup>26</sup> Additional concerns over the impact of Brexit and European funding for the youth work sector creates increasing uncertainty and decreased motivation and morale across the workforce.

**Question 4: Are there any other issues you consider relevant to the Inquiry that you think the Committee should be made aware of? (for example: workforce related issues; the Quality Mark for Youth Work in Wales; buildings and infrastructure; youth work in schools; transport issues; access to digital technology; Welsh Government's consultation on proposals to register and inspect some out of school education settings)**

Youth workers in schools can develop and enhance young people's learning, emotional wellbeing and resilience, supporting young people to reach their full potential within formal learning environments. The National Youth Work Strategy 2014 - 2018 states that relationships between schools and youth work services appear inconsistent across Wales and therefore must be more effectively developed and aligned<sup>27</sup>. It is my view that youth work should be protected and celebrated as a distinct profession in its own right. Recognition should be given to the significant contributions youth work has to make to wider agendas, including education, health and emotional wellbeing. There is strong evidence, for example, that promotion of strong relationships<sup>28</sup>, bonding, attachment and positive relationships<sup>29</sup> are key mitigating factors in tackling low mental health and preventing Adverse Childhood Experiences. We know there are substantial gains to be had if targeted actions are taken to prevent Adverse Childhood Experiences and youth work professionals play a crucial role in providing and enhancing trusted relationships between adults and young people.

With Curriculum Reform moving forward, the contribution of statutory and voluntary youth work services has not been fully recognised. In my consultation response to Donaldson's *Successful Futures* Independent Review<sup>30</sup>, I urged Welsh Government to recognise the breadth of children and young people's learning experiences and to ensure that all educational leadership structures and professionals are supported<sup>31</sup>. It

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<sup>25</sup> Wylie, T. (2016) *Developing Youth Work in Wales* <<http://gov.wales/docs/dcells/publications/160318-developing-youth-work-in-wales-en.pdf>> [accessed on 03 May 2016]

<sup>26</sup> Welsh Government (2015) *Statistical Release: Youth Work in Wales 2014-15* <<http://gov.wales/statistics-and-research/youth-services/?skip=1&lang=en>> [accessed on 07 September 2016]

<sup>27</sup> Welsh Government (2014) *National Youth Work Strategy for Wales 2014-18* <<http://dera.ioe.ac.uk/19353/1/140221-national-youth-work-strategy-en.pdf>> [accessed on 04 May 2016]

<sup>28</sup> Public Health Wales (2016) *Welsh Adverse Childhood Experiences (ACE) Study: Adverse Childhood Experiences and their association with Mental Well-being in the Welsh adult population*.

<[http://www2.nphs.wales.nhs.uk:8080/PRIDDocs.nsf/7c21215d6d0c613e80256f490030c05a/9a2fe7f1e063c61b80257fdc003ab86f/\\$FILE/ACE%20&%20Mental%20Well-being%20Report%20E.pdf](http://www2.nphs.wales.nhs.uk:8080/PRIDDocs.nsf/7c21215d6d0c613e80256f490030c05a/9a2fe7f1e063c61b80257fdc003ab86f/$FILE/ACE%20&%20Mental%20Well-being%20Report%20E.pdf)> [accessed on 08 September 2016]

<sup>29</sup> Public Health Wales (2015) *Welsh Adverse Childhood Experiences (ACE) Study: ACEs and their impact on health-harming behaviours in the Welsh adult population*

<[http://www2.nphs.wales.nhs.uk:8080/PRIDDocs.nsf/7c21215d6d0c613e80256f490030c05a/d488a3852491bc1d80257f370038919e/\\$FILE/ACE%20Report%20FINAL%20\(E\).pdf](http://www2.nphs.wales.nhs.uk:8080/PRIDDocs.nsf/7c21215d6d0c613e80256f490030c05a/d488a3852491bc1d80257f370038919e/$FILE/ACE%20Report%20FINAL%20(E).pdf)> [accessed on 08 September 2016]

<sup>30</sup> Donaldson, G. (2015) *Successful Futures: Independent Review of Curriculum and Assessment Arrangements in Wales* <<https://hwbplus.wales.gov.uk/schools/6714052/Documents/Donaldson%20Report.pdf>> [accessed on 06 May 2016]

<sup>31</sup> Children's Commissioner for Wales (2015) *Consultation Response: Donaldson 'Successful Futures' Independent Review* Available on request

has been disappointing to see a lack of engagement with wider youth services within the Curriculum Reform work undertaken to date, who I believe have a significant role to play in realised Wales's *Curriculum for Life*<sup>32</sup> ambitions.

I welcome the proposal for the professional registration of youth workers in Wales as a means of support and investment in the sector. I previously raised concerns in relation to focussing on achieving professional parity with other professions including teaching and social work, the importance of embedding continuous professional development, and extending the proposed registration requirements to include Youth Support Workers within paid employment within the voluntary sector<sup>33</sup>. I believe that extending registration requirements to the youth work sector in Wales and safeguarding the Joint Negotiating Committee's terms and conditions for Youth and Community workers<sup>34</sup> in Wales would safeguard against uncertainty, demonstrate fairness across the sector, and solidify Wales's commitment to meeting high quality professional learning requirements for youth work.

I believe that relevant, accurate and accessible information is vital for children and young people to become active members of society. An increasing number of children and young people require high quality information and support through online technology and the digital competence framework being finalised as part of the curriculum reform recognises the need for an increased focus on access to digital technology. However, it must be recognised that not all children and young people have easy access to digital technology, particularly in more deprived or rural communities, therefore the development of digital technology as a replacement delivery tool for youth work should be approached with caution; my Office has previously advocated for a range of methods to be adopted for youth service delivery across Wales<sup>35</sup>.

**Question 5: If you had to make one recommendation to the Welsh Government from all the points you have made, what would that recommendation be?**

I recommend the revision of *Extending Entitlement* as the statutory guidance underpinning the provision of youth work in Wales, to ensure that the statutory guidance published fourteen years ago is brought in line with new legislative requirements as set out in the Social Services and Wellbeing (Wales) Act 2014 and the Wellbeing of Future Generations (Wales) Act 2015. Revising the statutory guidance in relation to youth work will provide an underpinning structure which can be put into practice at a local level which takes account of more recent legislative and strategic policy developments.

The revision of this statutory guidance should aim to inspire a co-ordinated national approach to consistently drive and champion best practice in relation to youth work across Wales, ensuring that youth work is governed in a more conjoined and less disparate manner. This could be achieved through the introduction of Youth Work Sufficiency Assessments and Annual Action Planning process, the undertaking of full Children's Rights Impact Assessments in relation to local, regional and national budget setting processes, and utilising proposed registration requirements to provide a key mechanism to enable greater workforce involvement in strategic decision-making for youth work in Wales<sup>36</sup>.

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<sup>32</sup> Welsh Government (2015) *Qualified for Life: A curriculum for Wales – a curriculum for life* <

<http://gov.wales/docs/dcells/publications/151021-a-curriculum-for-wales-a-curriculum-for-life-en.pdf> > [accessed on 11 March 2016]

<sup>33</sup> Children's Commissioner for Wales (2016) *Consultation Response: Welsh Government proposal for the registration of youth workers with the Education Workforce Council for Wales*. Available on request

<sup>34</sup> Joint Negotiating Committee (2005) *Report of the Joint Negotiating Committee for Youth and Community Workers* <

[http://www.local.gov.uk/c/document\\_library/get\\_file?uuid=ccbe2a85-3f13-4f82-ae15-a05456582a53&groupId=10180](http://www.local.gov.uk/c/document_library/get_file?uuid=ccbe2a85-3f13-4f82-ae15-a05456582a53&groupId=10180) > [accessed on 11 March 2016]

<sup>35</sup> Children's Commissioner for Wales (2013) *Consultation Response: A vision for a new National Youth Work Strategy for Wales 2014 – 2018*. Available on request

<sup>36</sup> Children's Commissioner for Wales (2016) *Consultation Response: Welsh Government proposal for the registration of youth workers with the Education Workforce Council for Wales*. Available on request