

# A Plan for all Children and Young People, 2019 - 2022



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# The Children's Commissioner's ambitions for Wales in 2022



## Wales: a country where rights become reality

- **Wales:** a country where services work together to give children and young people a one-stop, 'no wrong door' support for mental health and wellbeing
- **Wales:** a country where public organisations from every sector, including health, local authorities, police, sport, arts and leisure are prioritising children's rights when designing and delivering services for children and young people
- **Wales:** a country that is proud to enshrine children's human rights in its laws and policies

## Learning, understanding and experiencing rights

- **Wales:** a country where all children learn about their rights in schools
- **Wales:** a country where children not only learn about their mental health and wellbeing, but are supported by all those around them in school to grow up happily and healthily
- **Wales:** a country whose government has taken new steps to reduce child poverty and its impact

## Protecting your rights, wherever you are

- **Wales:** a country which will give children the same protection from physical punishment as adults
- **Wales:** a country which respects children's rights in all education settings, including those who are educated at home
- **Wales:** a country with sufficient safe accommodation for our children with the most complex mental health and behavioural needs who need to live away from home

## Being accountable to children in Wales

- **Wales:** a country whose children's commissioner is fully accountable to the democratically-elected body of young people, the Senedd Ieuentid

# Our purpose

**The Children's Commissioner for Wales is an independent children's human rights institution established in 2001. The Commissioner's principal aim is to safeguard and promote the rights and welfare of children and young people.**



Professor Sally Holland took up her post as the Commissioner from 20 April 2015, having been appointed by the First Minister for a seven-year term.

Two laws set out rules about how the Commissioner can carry out her work. These laws also give her certain powers. These are the Care Standards Act 2000 and the Children's Commissioner for Wales Act 2001 (which amended the Care Standards Act 2000).

**[You can read a summary of the Commissioner's powers here.](#)**

# Our values

Children and young people play a clear and genuine part in informing and helping direct our work.

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We ensure that children and young people with whom we have contact are kept safe through our policies and practice.

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We aim to combat discrimination in all forms and adhere to equalities legislation in all spheres of our work.

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We give English and Welsh languages equal status in our organisation and external communications and encourage the use of Welsh as an everyday language in our office.

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We adhere to the One Welsh Public Services Values and principles of our work.

**“I aspire to a Wales where all children and young people have an equal chance to be the best that they can be.”**

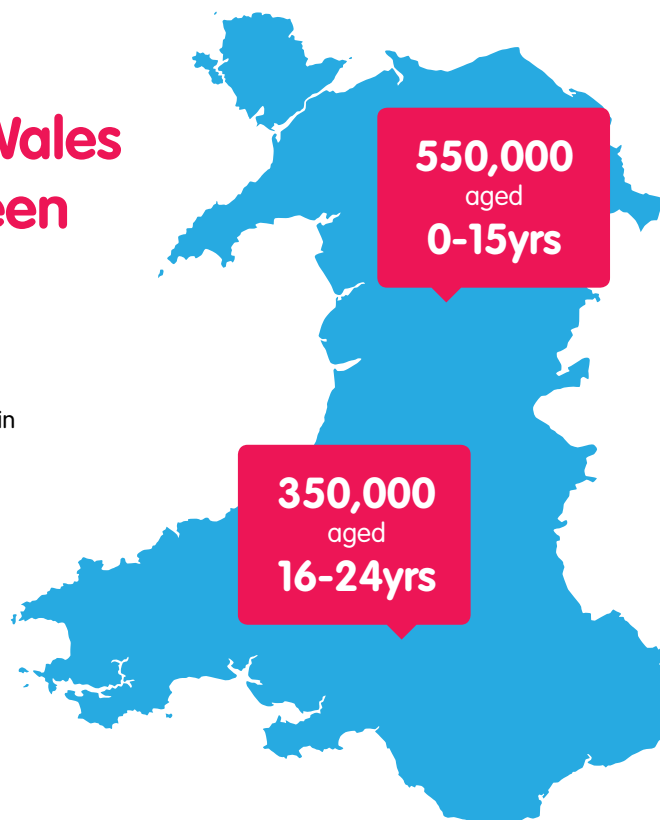
Sally Holland,  
Children’s Commissioner for Wales

# Our Wales

There are just over 550,000 children age 0 – 15 living in Wales and a further 350,000 between the ages of 16 – 24.

As the Children’s Commissioner for Wales, our role is to promote and protect the rights and welfare of children up to the age of 18 or 25 in certain circumstances.

Every three years the Commissioner publishes a three-year plan, outlining what we’ll be working on to improve the life chances of children in Wales. This plan is developed from current research evidence about children’s access to their rights in Wales and our own consultation with Welsh children and adults. To help shape Sally Holland’s final plan as the Commissioner, we split the consultation work into three phases:



## Phase 1 (Apr - Sept 2018):

### **Meetings and face-to-face consultation**

work were undertaken by the Commissioner and the team with education and health organisations, including health boards, patient groups, and child health specialists, academic institutions, community groups, Commissioner’s Ambassador groups, non-governmental organisations and children and young people aged 3+ attending the Urdd Eisteddfod.

This phase also included a separate [nationwide survey with 6392 pupils and 391 teachers](#) from our Ambassadors schemes, measuring how far children and young people in Wales are experiencing the five principles of a children’s rights approach in their education.

## Phase 2 (Oct 2018):

We considered the [national information](#) which is already collected about children and young people, including routine administrative data as well as quantitative and qualitative data which is self-reported by children and young people in surveys and research studies, the results of which were published in a comprehensive evidence review.

## Phase 3 (Oct - Nov 2018):

**Beth Nawr? | What Now? Surveys** for children, young people, parents/carers and professionals, seeking views about issues that are important to them, how they think some of them should be tackled and what they believe should be the focus of the Commissioner’s work over the next three years. Over 10,000 children and young people aged 3-18 took part in Phase 3, including 847 2-7 year olds who took part in age-appropriate workshops.

# Key findings

## Phase 1.

The mental health of children and young people was the most pressing issue that emerged from our **early meetings and workshops**; a number of concerns were raised about the provision and accessibility of services for children as well as the impact of electronic devices and social media on children's mental health and general well-being.



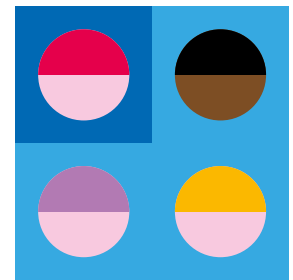
### Bullying within schools

especially for those with protected characteristics, was highlighted as a key concern and was one of the most frequently selected issues by children who took part in this phase of work.



### Poverty and social inequality

was the other major challenge identified and those living in rural areas were considered to be disadvantaged in terms of accessing services and extra-curricular opportunities, with poor public transport exacerbating the issue. Issues facing children from the poorest families were shared as concerns, including food poverty, limited access to additional support and difficulties affording school trips and uniforms.

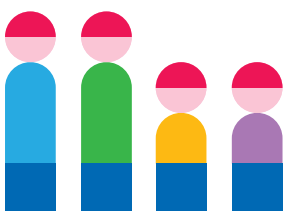


### Discrimination

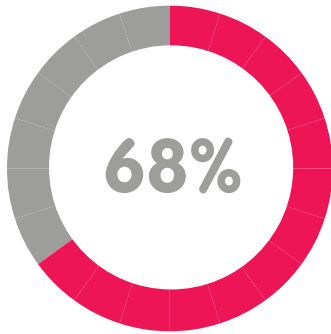
A number of groups of children were identified as being vulnerable due to discrimination, including children from Muslim families, those identifying as LGBT+, those from minority ethnic backgrounds and traveller communities. Disadvantages in terms of access to resources and support were also experienced by children with learning difficulties, young carers, children with parents in prison, homeless children, children from refugee and asylum seeking families, and children attending pupil referral units.

### Safety

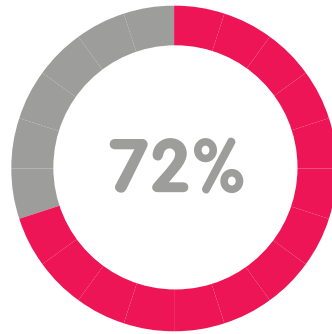
Safety within families and communities was also commonly discussed, with younger children discussing the centrality of family and safe play in the community, and professionals emphasising the need for family support for struggling families and protecting children from domestic abuse and other violence. Others spoke about the need for more action to raise awareness of children's rights.



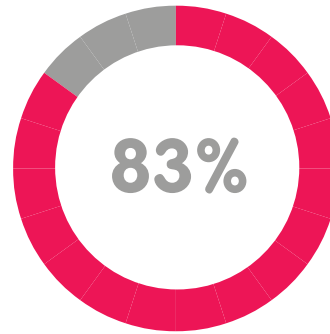
Our [nationwide survey](#) of rights in schools included some real positives about children's experiences in schools:



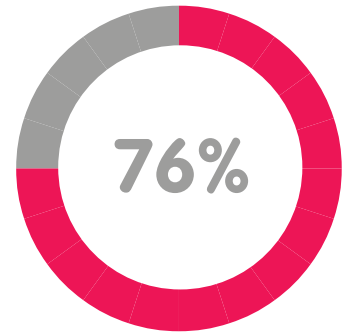
68%  
said all children feel welcome in their school.



72%  
of primary aged children said they had a chance to take part in decisions in their school.

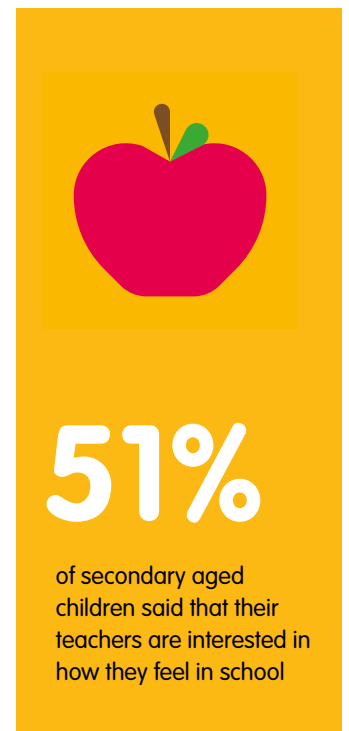
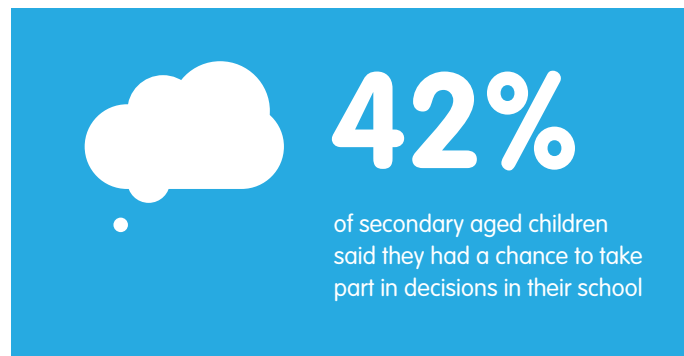


83%  
of primary aged children said teachers are interested in how they feel in school.



76%  
of secondary aged children said they can share their opinions about learning.

Yet there remain areas of concern:



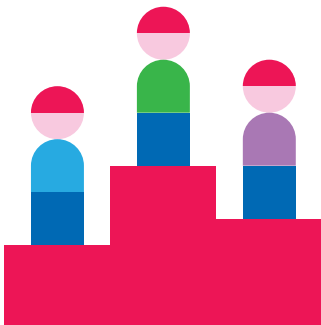


## Phase 2.

# 'The Human Rights of Children in Wales'

The key points from the evidence review fall into twelve areas:

1



### Children from different social groups have different experiences and prospects:

persistent income inequalities remain as a key underlying factor associated with different experiences and outcomes for children. Although there are a number of wide-scale initiatives to reduce inequalities in education, and educational outcomes for all groups have improved, the gap between groups remains persistent.

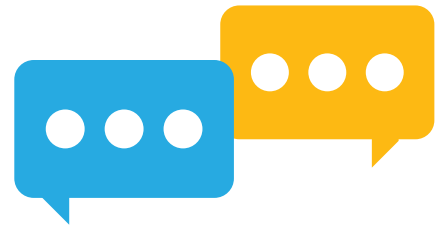
2

### Direct discrimination and bullying:

New guidance on preventing and tackling bullying in schools is due but there is currently no obligation on schools to record instances of bullying in school when they are related to someone's protected characteristics. Without this information available at a school level, it cannot inform schools in evaluating and improving their approach to direct discrimination and bullying.



3



### Participation:

Every school in Wales must have a school council and every local authority has a participation mechanism e.g youth forum. There is some evidence that the effectiveness of these are varied across Wales and greater understanding is needed of how to ensure that all children and young people feel that they can have a say in their school and community.

4

### Health and well-being:

Some of the most positive trends in children's lives in recent years have been in relation to health. However, there are concerning trends in relation to obesity and fruit and vegetable consumption, with Wales' children more likely to be over-weight than those in England.

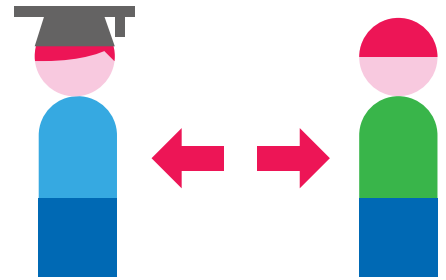


5

**Poverty and homelessness:**  
Unless changes are made to eligibility rules for free school meals and implementation of Universal Credit, the prospect for child poverty in Wales are very likely to worsen.



6

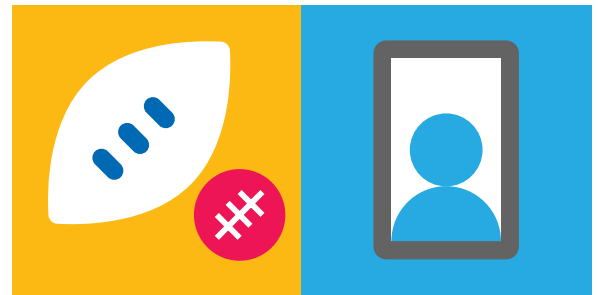


**Education:**

There has been a steady rate of improvement in educational achievements at each stage but due to this rate of increase applying to all social groups, gaps in attainment between groups remain.

7

**Play, arts and leisure activities**  
Wales' legislation reflects the right to play on a statutory level and there's been a steady increase in sports participation among children. However, these positives are constantly under threat with local authority funding pressures leading to the closure of some play, youth and leisure services in Wales. The impact of screen time on children's physical and emotional health is also an emerging concern.



8

**Family environment and alternative care:**  
The significant challenges facing Wales in this area have been recognised through the formation of an active Ministerial Advisory Group that engages local authorities, charities, government officials and others in a range of activities which aim to reduce numbers in care and improve the experiences of those in the care system.



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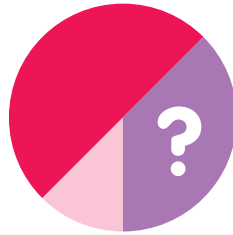
**Violence, abuse and neglect:**  
Prevention and intervention in neglect and abuse cases required both a general public health approach to improve parenting overall as well as direct child protection intervention where abuse and neglect are present. Survey results demonstrate that physical punishment of children is declining in Wales but there is a rise in sexual abuse involving online exploitation.



10

### Asylum-seeking and refugee children:

There is a major gap in data on asylum-seeking and refugee children in Wales.



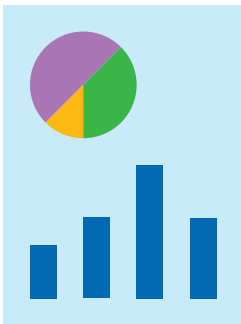
11

### Children in the youth justice system:

Despite the reduction in the number of children serving custodial sentences in Wales, concerns have been raised about the lack of facilities in Wales for young offenders and the safety of children held in custodial institutions.



12



### Data availability and quality:

Welsh Government needs to collect more information on some areas of children's lives in Wales in order to understand more about their experiences of accessing their rights.

This evidence review shows that some aspects of children's lives in Wales are improving, including areas of health such as lower infant mortality, better dental health, less smoking and drinking and much lower rates of teenage pregnancy. Yet, significant challenges remain with two areas posing great concern: the income and social inequalities that affect children's life experiences and the mental health and well-being of children and young people, both in and out of the school environment.

## Phase 3.

# Beth Nawr? / What Now?

Surveys designed to enable children, parents and professionals to contribute their views on issues and priorities for the Commissioner were completed by:

**6902** children aged **7 -11**

**2300** young people aged **11 – 18**

**34** children aged between **10 and 18** chose to complete the accessible survey

**585** professionals

**647** parents / carers

Additionally **847** children aged **2-7** took part in teacher-led consultation workshops

**TOTAL: 11,315**

The findings and full analysis of each survey have been published in full here, but below are highlights of the worries of each age group and the views of what the Commissioner's priorities should be.

## Under 7s

- 13 nursery and school settings
- 847 children under the age of 7 took part in workshops.

The workshops explained who Sally Holland is and what rights are, based on a concept of wants and needs, asking "What do you need to grow up happy, healthy and safe?"

Feedback from children in every setting mentioned parents and extended family members as key to ensuring that they were happy, healthy and safe. Teachers and some other professionals were also regularly mentioned.

**'make sure grown-ups are happy and kind'**

**"We are happy to learn more about our rights. We know we can ask lots of different people if we need help or if something upsets us."**

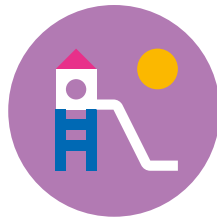
### What helps you be happy, healthy and safe?

There were frequent references to 'healthy food' and fruits, vegetables and water. The majority of responses also mentioned the importance of exercise.



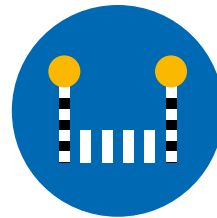
#### Activities

Groups also mentioned the importance of activities such as playing, colouring, art and after school clubs.



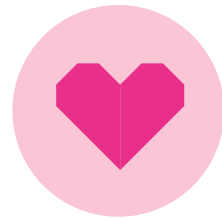
#### Locations

a 'safe playground' and a 'safe place to live.' 'schools should have a safe place to go if they (children) need to talk.'



#### Boundaries and being kept safe

'we would all like to learn how to cross the road' 'have good school rules,'



#### Relationships

people who 'love you,' 'listen to you,' and 'look after you.'

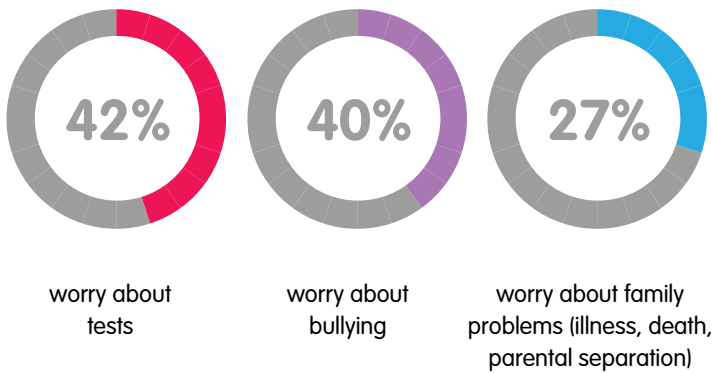
**"Sally should do Mindfulness to keep her relaxed like us."**

**"more  opportunity to exercise"**

**"please can we start doing daily miles to keep us healthy"**

# Children aged 7 – 11

## Worries

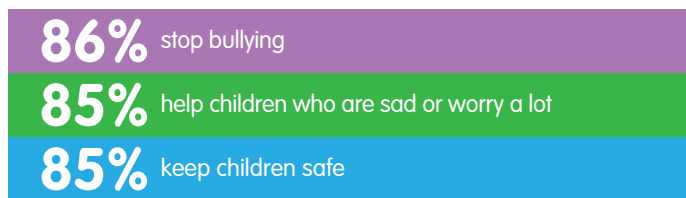


**"I get worried that my dad will leave our family again."**  
(Girl, 10)

**"...because (parents) won't listen to me or anything or attend to my needs when they are on their mobile phone."**  
(Girl, 10)

**"People being mean to me online"**  
(Boy, 9)

## Commissioner's priorities should be:



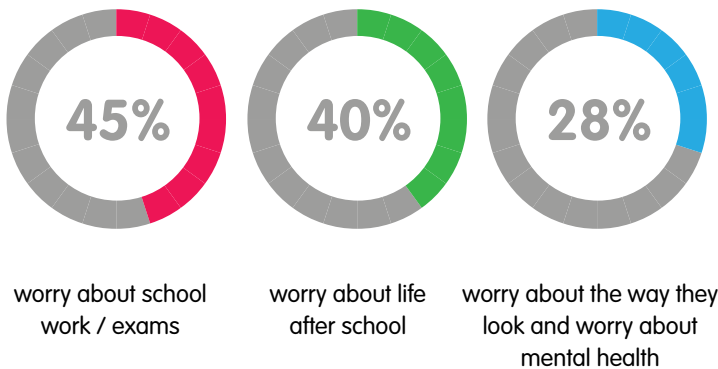
## Top Priorities:



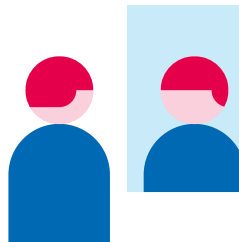
**"I sometimes worry about tests as I am under a lot of pressure."**  
(Girl, 9)

# Young people aged 11 – 18

## Worries



On most questions about worries or concerns, girls expressed higher levels of concern than boys, as did children from more materially deprived backgrounds than those from wealthier backgrounds.

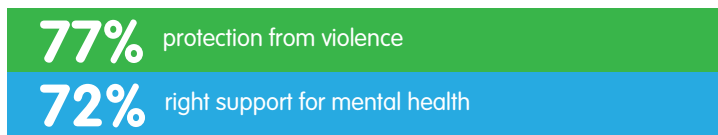


**“Not being able to get a job when I’m bigger coz I have learning problems and understanding problems.”**  
(Girl, 10)

**“In general, I worry a lot about many things on a day to day basis.”**  
(Girl, 14)

**“I’m worried mostly about GCSEs.”**  
(Boy, 11)

## Commissioner’s priorities should be:



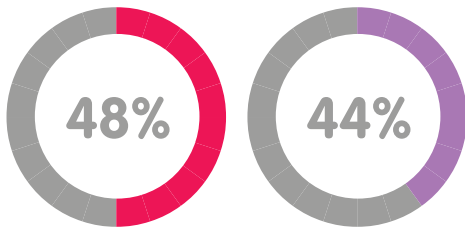
## Top Priority:



# Accessible version

(children who accessed our survey for children with additional learning needs)

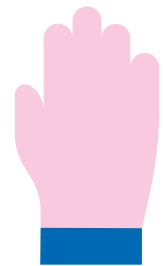
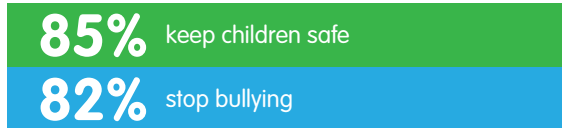
## Worries



worried about family problems

worry about bullying

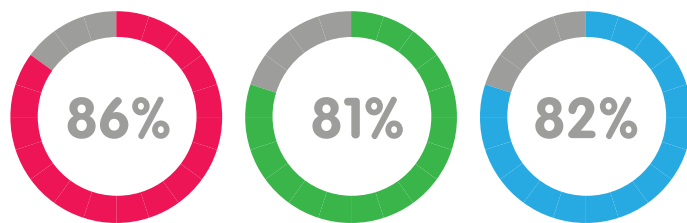
## Commissioner's priorities should be:



## Professionals

## Parents' and carers

## Worries

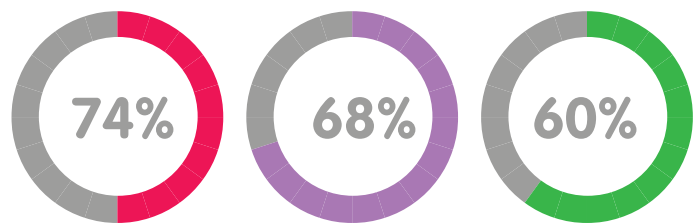


worry about the mental health of children

worry about effect of social media

worry about family problems

## Worries



worry about mental health

worry about bullying

worry about effect of social media

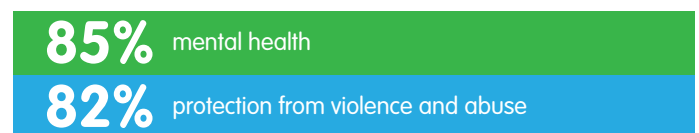
## Commissioner's priorities should be:



## Top Priority:

**46%** right help for mental health or emotional problems

## Commissioner's priorities should be:



## Top Priority:

**34%** right help for mental health or emotional problems



# Our ambitions

From speaking with over **10,000** children, young people and those who care and work for them, and reviewing the best available evidence, we have identified four new ambitions for the team to deliver over the next three years. They are:

1

Wales: a country where rights become reality

2

Protecting rights, wherever you are

3

Learning, understanding and experiencing rights

4

Being accountable to children in Wales

We explain more about these ambitions on pages 21-24

# Our 'Right Way'

In March 2017, we published 'The Right Way: A Children's Rights Approach in Wales'. It is a principled and practical framework for working with children, grounded in the UN Convention on the Rights of the Child (UNCRC). Its main purpose is to encourage public bodies and organisations in Wales to adopt a children's rights approach which, in turn, will help deliver real changes in children's everyday quality of life and equal chances to fulfil their potential. Included in the framework are five principles:

1

**Embedding children's rights:** children's rights should be at the core of planning and service delivery.

2

**Equality and non-discrimination:** is about ensuring that every child has an equal opportunity to make the most of their lives and talents, and that no child has to endure poor life chances due to discrimination.

3

**Empowering children:** means enhancing children's capabilities as individuals so that they are better able to take advantage of rights, and to engage with, influence and hold accountable those individuals and institutions that affect their lives.

4

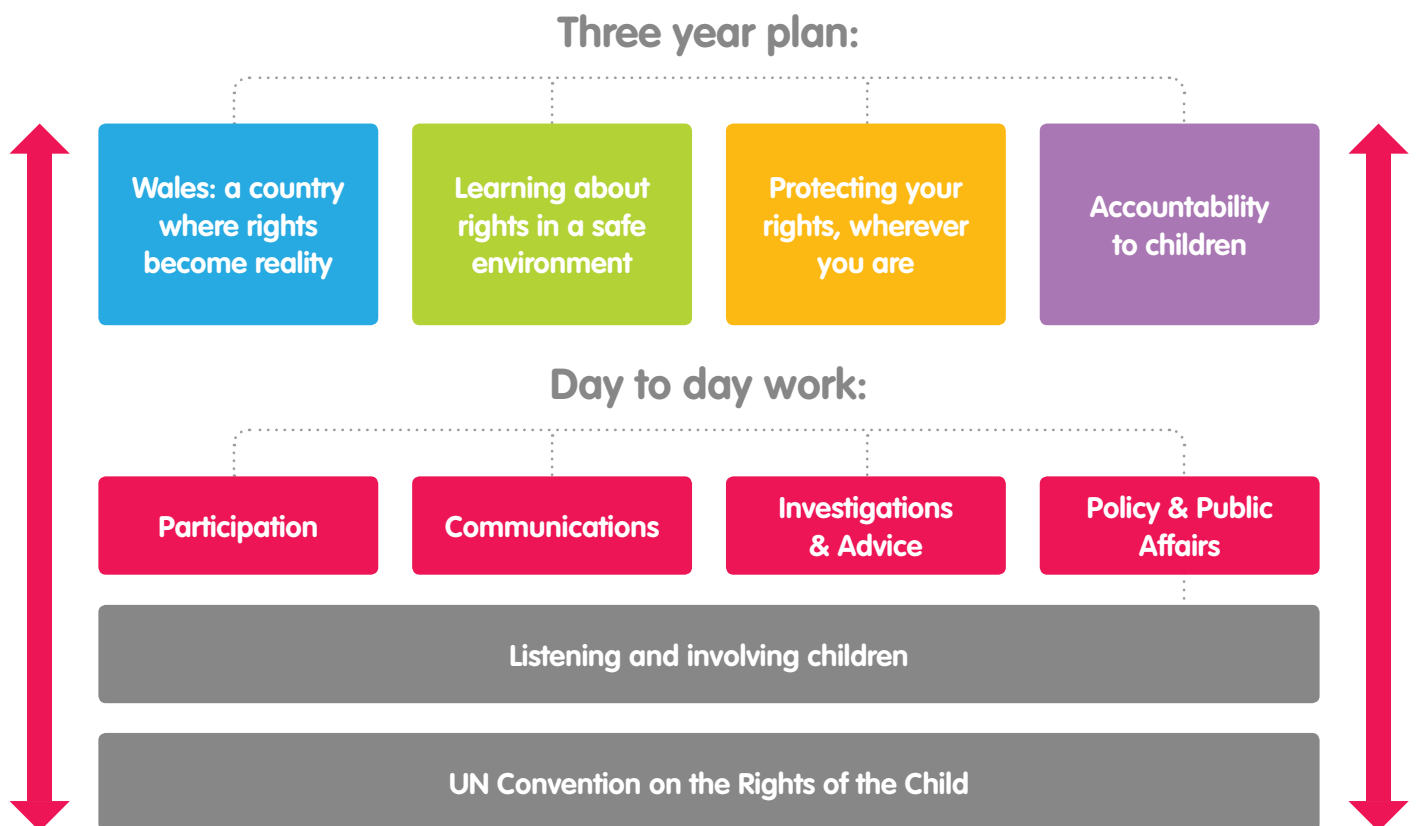
**Participation:** means listening to children and taking their views meaningfully into account.

5

**Accountability:** authorities should be accountable to children for decisions and actions which affect their lives.

# Three year plan:

Here is how we work to help deliver real changes in children's lives; this is our 'Right Way' from 2019 - 2022



## In practice this means:

1

### **Embedding children's rights:**

the UNCRC underpins all our work and we continue to influence other public bodies in Wales to adopt a similar approach.

Our policy and influencing work ensures that laws, policies and practice across all levels of Government in Wales protect children's rights.

2

### **Equality and non-discrimination:**

Our Investigations and Advice service plays a critical role in delivering this principle by helping individual children and their families who feel they've got nowhere else to go with their issues.

Through key projects – all of which are expected to be planned with a full equalities impact assessment - we strive to tackle equality and discrimination issues head-on to ensure every child in Wales has an equal chance to be the best that they can be.

3

### **Empowering children:**

Our communications work is focused on increasing awareness of children's rights and the role of the Commissioner, so that children themselves have access to information which enables them to understand and exercise their rights.

4

### **Participation:**

Every member of our staff team has a responsibility to engage with children and young people in all four corners of Wales. We aim to make sure all our work with children and young people is inclusive and accessible. Children's views and opinions inform all our projects and we've listened to over 10000 children and young people's views to us to help shape this three-year plan.

5

### **Accountability:**

Investing in a children's rights approach enables us to have a real focus on the particular needs of children and ensures we create a platform where children and young people can hold us to account on what we promised to deliver. Our advisory panels of young people provide strategic support to the Commissioner and the team and plans are afoot to ensure the Commissioner becomes accountable to the democratically-elected Senedd Ieuencid (Youth Parliament) for Wales.

## The Commissioner has a 23-strong team of officers to deliver this day-to-day work and project work. They work in four distinct, yet interlinked, functions:

- 1. Investigations & Advice:** a team of officers who advise children, young people and those who care for them if they feel they've got nowhere else to go with their problems.
- 2. Policy & Public Affairs:** a team of advisers who influence government and other organisations who say they're going to make a difference to children's lives, making sure they keep their promises to children and young people.
- 3. Participation:** a team of officers who support children and young people to find out about children's rights and listen to them to find out what's important to them e.g. our Ambassadors scheme.
- 4. Communications:** a team of officers who help speak up for children and young people nationally on important issues.

# Wales: a country where rights become reality



## What's the issue children and young people have told us about?

Our public services still do not meet the needs of our children and young people effectively. Children and their families have to navigate complex systems and are often not helped because they do not fit neat categories or are not helped until they are in crisis. This is a particular problem in our mental health services and disabled children's services. This was a strong message from young people, parents and professionals in Beth Nawr.



## What will we do about it?

### Project work in Year 1 (2019/20)

- Actively challenge those responsible for our public services nationally and locally to ensure that our systems work together to be responsive to children's and their families' needs – especially in relation to mental health and disability
- We will work with public bodies including health boards, local authorities and the police to ensure they use children's rights to guide their work with children, using our 'The Right Way' framework.
- We will work with government on opportunities to extend children's rights in law, including further incorporation of the UNCRC into Welsh domestic law.
- We will report on Wales' progress and commitment to children's rights following the UN Committee on the Rights of the Child's Concluding Observations 2016

### Day-to-day work

- We will continue to operate within a children's rights framework ourselves.
- We will continue to press Government and others to deliver what they promise for children and young people, through our policy and public affairs work.

## What are we trying to achieve?

We want to ensure children and young people across Wales are given meaningful opportunities to be informed, involved citizens and that children's rights are embedded across the country's public services.

# Learning, understanding and experiencing rights



## What's the issue children and young people have told us about?

There is a strong demand from children, parents and professionals for schools to be centres of excellence for wellbeing, inclusion and to equip Wales' children to make positive contribution to society as citizens. This means that they are supported emotionally, learn and experience healthy relationships with others and they understand and respect the human rights of those from diverse backgrounds.

Our evidence review and consultation revealed that bullying continues to be a concern for children and young people.



## What will we do about it?

### Project work in Year 1 (2019/20)

- We will celebrate 30 years of the UNCRC in Wales, in 2019 and use this year to publicise children's rights.
- We will explore rights in the early years by extending our ambassador scheme to cover early years' settings and providing information and resources for parents.
- Look in detail at the quality of participation of children and young people in decision-making, including in school settings.

### Day-to-day work

- We will work to influence and scrutinise Government on the creation of the new curriculum to ensure through legislation that children learn about their human rights, learn in an environment that protect their rights, and are therefore equipped to protect and promote the rights of others in society.
- We will continue to work with government to ensure children, wherever they're educated, have access to the very best education.
- We will continue recruiting to and supporting our Super Ambassadors, Student Ambassadors and Community Ambassadors.
- We will scrutinise those implementing the Additional Learning Needs and Education Tribunal (Wales) Act 2018 to pay particular attention to their new duty to pay due regard to children's rights.

## What are we trying to achieve?

We want to ensure children and young people across Wales have an inclusive, rights-based education.

# Protecting rights, wherever you are



## What's the issue children and young people have told us about?

The importance of keeping children safe from harm or abuse emerged as a high or top priority across most age groups in Beth Nawr, from 3 year olds through to professionals.

There was also wide-spread concern about groups of children that face unequal chances due to poverty, disability, mental health issues and family problems from Beth Nawr and face-to-face consultations with children and adults.

Our evidence review also revealed inequalities brought about by poverty as a major challenge for Wales, alongside the challenges of supporting children's mental health and those with disabilities.



## What will we do about it?

### Project work in Years 1 - 3

- We will investigate the experiences of children who face the most challenges to take up their rights through a series of thematic reviews.
- Working with colleagues in Wales and internationally, we will work to promote children's digital rights in 2019-20.

### Day-to-day work

- We will continue to highlight the need to protect the rights of children who may be particularly vulnerable because they are marginalised or hidden from view. This includes those 'under the radar' of universal services, children in out-of-home care, including mental health care and residential schools, refugees and homeless children.
- We will continue to listen to children and young people who may be particularly vulnerable through our Community Ambassador scheme.
- We will continue to chair the national Child Sexual Abuse and Exploitation Roundtable.
- Our influencing work will ensure our recommendations relating to bullying, including cyberbullying, and child poverty from key publications are implemented in full.

## What are we trying to achieve?

We want to protect the rights of children and young people, wherever they may be in Wales, on-line and off-line.

# Being accountable to children in Wales



## What's the issue children and young people have told us about?

The law which established the office states the Commissioner should protect and promote children's rights and welfare in Wales. We believe that for the Commissioner to be a true children's champion, she must be held accountable by the country's children, for the decisions and actions which may affect their lives.



## What will we do about it?

### Project work in Years 1 - 3

- We will ensure our office is as accessible as possible to staff and members of the public.
- We will ensure our advisory panels, including our young people's panel, are having meaningful impact on our work.
- We will ensure the information we process is managed responsibly.
- We will review the impact of our first three-year plan and publish the findings.

### Day-to-day work

- We will work with Wales' new Youth Parliament to establish a mechanism for the Commissioner to be scrutinised annually by the democratically-elected body.
- We will ensure our participation work is guided by Wales' National Participation Standards.
- We will report our work, including our financial and risk work, to our Audit and Risk Assurance Committee and our advisory panels on a quarterly basis.
- We will work in a sustainable way, and aim to embed the principles of the Well-being of Future Generations (Wales) Act 2015 in our practice.
- We will ensure we deliver value for money and commit to providing transparent estimates of our financial needs to the Welsh Government and ensure we have sound internal controls.

## What are we trying to achieve?

We want our office to epitomise a children's rights-based approach.



# How will we know we're making a difference?

**We evaluate every aspect of our project and day-to-day work and publish highlights of the impact we have made in our annual report to the First Minister for Wales.**

**We will publish an evaluation of the impact of our 2016-19 work programme in autumn 2019 and will publish an evaluation of the impact of this 2019-22 work programme after it is completed.**

## How we will work to deliver this

With a modest annual budget of around £1.5m set by the Welsh Government, we want to make sure we're effective, efficient and continually evaluate our work and impact. Here are our principles for delivery:

- We deliver the best value we can with our public money.
- All activities are linked clearly to the organisation's strategic plan.
- We are as transparent as possible, internally and externally, regarding how we have made decisions about priorities and methods of delivery.
- We maintain clear, logical and strong governance structures and quality assurance mechanisms.
- Wherever possible, the organisation measures the impact of its activities.
- We develop and maintain logical and efficient systems management for storing, retrieving, analysing, monitoring and reporting data.
- We work alongside other organisations where this will be of benefit to further the rights of children in Wales, but we retain the ability to independently scrutinise public bodies.
- We treat all people who contact our office with respect and courtesy at all times. We maintain a clear and accessible complaints policy.
- We are an employer that values and enables employees' contributions and gives them an opportunity to develop their skills.

For more information about our work,  
please visit our website:

**[www.childrenscommissioner.wales](http://www.childrenscommissioner.wales)**

**T: 01792 765600**

**E: [post@childcomwales.org.uk](mailto:post@childcomwales.org.uk)**



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