



A manifesto for the
Senedd elections 2021
from The Children's Society

**The
Children's
Society**

The 2021 Senedd election follows an incredibly challenging year. The Covid-19 pandemic has brought about a number of difficulties for children and families across Wales, and the task of the next Welsh Government will be to chart a course to recovery.

This crisis has required swift action and new ways of working. It has also demonstrated the resilience of the Welsh people, and their resolve to see the injustices which plague our society put right. This election ought to be seen by all parties as the opportunity to set out a bold vision for the future of Wales, and to ensure that recovery does not mean a return to the days of old.

This means a renewed focus on how Welsh Government can support children and young people, whose well-being has been in decline for much of the past decade. This decline has only been worsened by Covid-19, poverty has worsened and children and young people are exposed to new risks. Their well-being is affected by a number of different factors, and this is particularly the case for children and young people who face particular hardship or difficulty – whether they are at risk of or experiencing exploitation, are unable to access appropriate mental health support, or are living in poverty.

The pandemic has exposed the challenges facing so many children, young people and families in Wales. But this upcoming election offers the next Welsh Government the opportunity to set an ambitious course to turn around the decline in children's well-being by doubling down on reducing child poverty, tackling the mental health crisis facing our young people, and introducing bold new measures to protect children from new and pernicious threats to their safety.

We are calling on all parties and candidates to be ambitious for every child in Wales. They deserve no less.

This document sets out The Children's Society's policy proposals which if implemented would help turn around the decline in children's well-being. The work of the next Welsh Government must be grounded in a commitment to improve children's subjective well-being – how they feel about their own lives.

A golden thread – improving children's well-being

'Well-being' is used to refer to a range of things in everyday life, such as being happy, not being ill, feeling fulfilled and being financially secure.

Successive Welsh Governments have emphasised the importance of improving well-being, having introduced major pieces of legislation which provide a framework for improving well-being in Wales and making well-being a key element of the new curriculum.

Two key pieces of legislation that place duties on public bodies in Wales to promote well-being are the Social Services and Well-being Act and the Well-being of Future Generations Act. While it is welcome that these major pieces of legislation exist, the well-being goals that the Acts aim to achieve focus on 'objective well-being' – that is, access to education, educational attainment, housing, access to rights, and access to work and training. These are important goals, however they do not take into account the importance of subjective elements of well-being, meaning how children feel about their lives – for example, whether they feel safe where they live or whether they enjoy school.

The Children's Society's research has found that low subjective well-being can be linked to poorer mental health and educational outcomes, but also wider factors such as self-esteem and confidence which in turn can influence a wide range of outcomes.



In our 2020 Good Childhood Report, we asked young people in Wales how they felt about their lives and how they felt they have coped with the changes brought about by COVID-19:

- Children in Wales were happiest with their family, health, and home.
- They were least happy with the future, school, and the amount of choice they have.
- With coping with life under lockdown, children and young people in Wales felt they had coped best with handwashing and social distancing, and coped least well with not being able to see their friends and family.

We are able to learn a great deal more about children and young people's lives by asking them about these aspects and how

they impact their lives. Good policy requires good evidence and an absence of data on children's subjective well-being remains a barrier to improving children's lives. Whilst children are required to learn about how to look after their well-being, policymakers in Wales do not know how children feel about their lives and what they need to help them to live a fulfilling life and achieve their ambitions in the difficult times ahead.

The next Welsh Government needs to prioritise improving data on children's subjective well-being. This could have positive implications for the development and implementation of policy relating to education, public health, social care, planning and housing at national and local levels. Importantly it could help provide a consistent objective of

policy and spending decisions and a narrative on children and young people for the next Welsh Government – to improve children's well-being.

We are calling on all parties to make a commitment to improve children's well-being the golden thread running through their proposals to form the next Welsh Government. This thread needs to be guided by a commitment to comprehensively measure children's subjective well-being and provide data at local authority and national level. This would enable young people's voices to have a greater impact on decisions that affect that their lives, and on the support developed to improve their lives.

Proposal one: Tackling Child Criminal Exploitation

Child Criminal Exploitation (CCE) takes a variety of forms, but ultimately it is the grooming of children into criminality. The current reality is that children caught up in CCE are often treated as criminals by statutory agencies rather than as victims of exploitation. CCE can include children being forced to work in cannabis factories, move drugs or money across the country, shoplift or pickpocket, or threaten other young people. Recently, Child Criminal Exploitation has become strongly associated with one specific model known as 'county lines'. In this model, organised criminal networks typically exploit young people and vulnerable groups to distribute drugs and money across the country from cities to rural and seaside towns through dedicated mobile phone lines.

It is hard to know the exact scale of CCE in Wales, but the National Crime Agency predicts that more than 100 criminal groups are operating in Wales, linked to networks in major cities in England.¹ This corresponds with what we have seen in our direct practice with children from Birmingham who are being trafficked into Wales for the purposes of transporting drugs. We also know that the models used by perpetrators are consistently evolving to avoid detection – for example recruiting children from children's homes, targeting children within rural and coastal towns which form their new markets for drugs, or children being forced out of school during the day to work a 'shift' before returning a short while later to avoid being reported as missing.

As part of our 2019 report on CCE, **Counting Lives**, we submitted Freedom of Information (FOI) requests to every local authority in Wales to learn about their procedures for responding to children who have been criminally exploited. Our findings highlight that there is no consistency across the country in terms of how children are identified and supported. Our findings showed the following:

- **8 out of 22** local authorities told us that they record information on the number of children under 18 referred to the National Referral Mechanism, a framework for identifying and referring potential victims of exploitation or modern slavery and ensuring that they receive the support that they need.
- **3 of out 22** local authorities told us that they record information on children classed as at risk of criminal exploitation.
- **3 of out 22** local authorities told us that they record information on children who are looked after and are classed as at risk of criminal exploitation.
- **8 out of 22** local authorities told us that they record information on children missing from home and are classed as at risk of criminal exploitation.
- **6 out of 22** local authorities told us that they record information on children missing from care and are classed as at risk of criminal exploitation.
- **3 out of 22** local authorities told us that they have a policy or protocol for children who are at risk of criminal exploitation.

More than 100
criminal groups
are operating
in Wales

¹ www.bbc.co.uk/news/uk-wales-48193917

To further understand the nature and scale of CCE, we have examined the number of arrests made by all four police forces in Wales of young people who were in possession of drugs or weapons (Fig 1), which are proxy measures linked to child criminal exploitation:²

Fig 1 – Arrests of children and young people for possession of drugs or weapons offences

	2017-18	2018-19	2019-20
Dyfed Powys Police Force	103	137	131
Gwent Police Force	172	182	176
North Wales Police Force	247	195	341
South Wales Police Force	371	534	519

In 2020,
108 children
in Wales were
referred to
the NRM

Alongside this, it is also useful to consider the number of referrals made by police forces in Wales to the National Referral Mechanism (NRM). That is, how many children have been formally referred to the route which will identify them as victims of exploitation:³

- In 2019 (Q2-4), 100 children in Wales were referred to the NRM.
- In 2020 (Q1-3), 108 children in Wales were referred to the NRM.

NB: No data is collected for Quarter 1 of 2019, and up until Quarter 4 of 2019, Child Criminal Exploitation was categorised as 'labour exploitation'.

Our research shows that there is a significant under-reporting to the NRM, so these figures likely present just a small fraction of the children actually experiencing CCE in Wales.

Both sets of data show that there are far more arrests of young people than referrals to the NRM, meaning that many young people are being treated as criminals rather than as victims of exploitation who require support.

We welcome existing provision for CCE in the Wales Safeguarding Procedures, but more must be done to prevent this form of exploitation from happening in the first instance and to ensure that victims are identified and supported. Whilst there is a national approach to other forms of child abuse and exploitation – such as the National Action Plan Preventing and Responding to Child Sexual Abuse – there is no equivalent for Child Criminal Exploitation. The evidence is clear that there is a need for a more strategic national response to CCE in Wales.

² www.gov.uk/government/statistics/police-powers-and-procedures-england-and-wales-year-ending-31-march-2020

³ www.gov.uk/government/collections/national-referral-mechanism-statistics

Service case study: Prevention

The Children's Society national child exploitation Prevention Programme works across Wales and England to tackle and prevent Child Sexual Abuse and Exploitation, Child Criminal Exploitation, Modern Day Slavery and Human Trafficking on a regional and national basis. The programme consists of a network of specialist prevention officers, each covering a designated policing region. They work in partnership with Regional Organised Crime Units (ROCU), Health, Education, Social Care and other Voluntary, Community and Faith sector organisations.

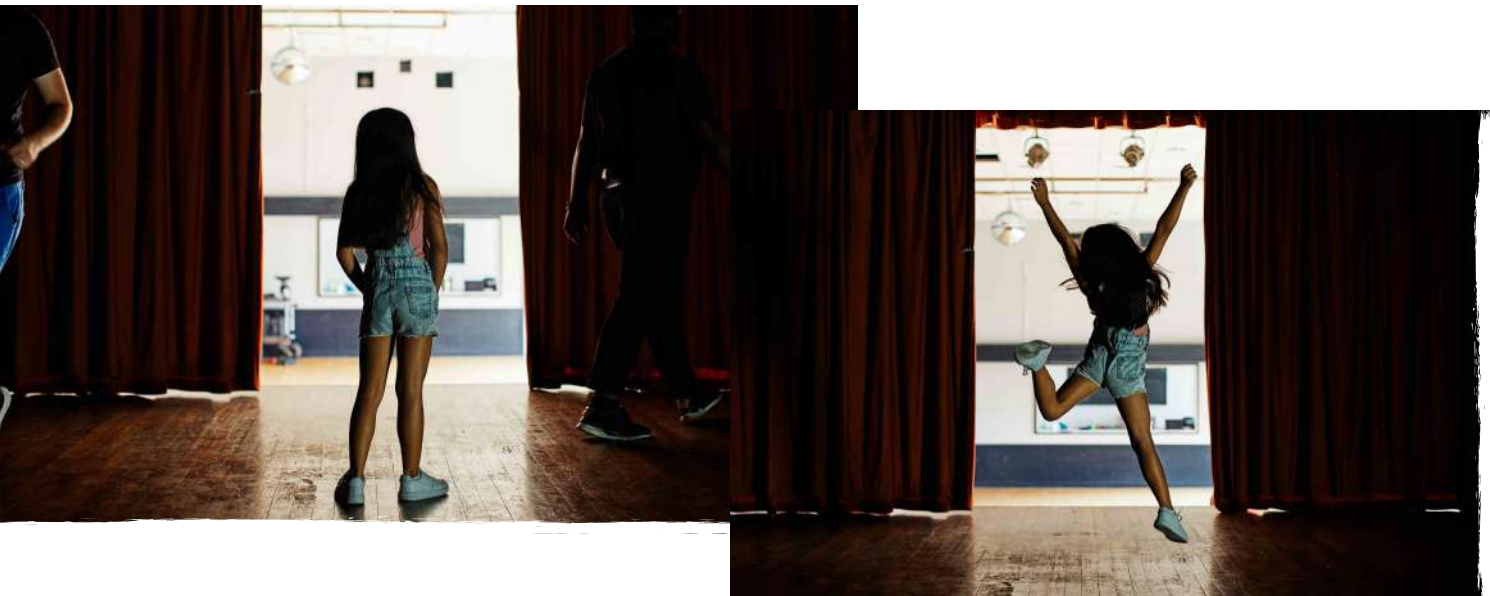
In Wales we are concerned about the number of 'county lines' coming into the country from different areas of England, and the need for improved information sharing across police forces and local authorities.

The programme leads the national #LookCloser campaign in partnership with the British Transport Police and the National County Lines Coordination Centre. In February 2021, the programme worked closely with police, statutory services, third sector organisations and businesses in Wales for a 'week of action'. The regional Prevention Officer delivered virtual webinars alongside the County Lines Co-ordinator and worked to spread awareness in places where child exploitation could be most visible during lockdown including parks, supermarkets and the online space.

The programme has also provided training on exploitation for children's homes in Wales. Children's homes are well documented as a site from which children are targeted by exploiters. This training is helping children's homes understand how to manage the risk that exploitation poses to children in their care. The programme also provides advice and training on CSE/A and has worked with the ROCU to develop a co-authored product on the rise in self-generated images, making recommendations for practice including working with the SchoolBeat programme.

There is no quick and easy fix to a complex issue such as CCE, but it is a heinous form of child abuse which has a life altering impact on victims' well-being and as such needs urgent attention. Cracking down on this form of exploitation will require cooperation and collaboration from all agencies, levels of government and the voluntary sector working in concert. Some of the required responses to CCE are outside the gift of Welsh Government, but the 2021 Senedd election presents an opportunity for parties set out how they would plan to work with councils and police forces across Wales to use the powers at hand to drive a strategic response to CCE.

We are calling for parties to commit to tackling child criminal exploitation in their manifesto. We propose that a national strategy is required to ensure that social care, police, education and health and youth justice all actively consider how they can identify child criminal exploitation, respond and ultimately prevent it.



Proposal 2: Ensuring Free School Meals (FSM) are available for every child who needs them

Currently, growing up in poverty in Wales is no guarantee of receiving a Free School Meal. Thousands of children in households in receipt of Universal Credit, and children whose parents have no recourse to public funds (NRPF), are currently ineligible for Free School Meals.

Since January 2019, an earnings limit of £7,400 has been applied to eligibility criteria for accessing Free School Meals, meaning that children from families who earn over this threshold would no longer be eligible for a daily meal when temporary transitional protections end.

Under previous legislation before the earnings limit was introduced, all families in Wales claiming Universal Credit were entitled to Free School Meals.

Entitlement under the legacy benefits system was complicated, but families were normally entitled if they were not

eligible for Working Tax Credit – this means that they were working under 16 hours per week (or 24 hours for couples) and their income were under £16,190 per annum.

Recent analysis from The Children's Society finds that 14% of parents whose children do not receive FSM have struggled with the cost of school food during recent months, with parents resorting to cutting down on food for themselves, delaying paying household bills, borrowing from friends or families or in a small number of cases using a food bank.⁴

Progress has been made during the pandemic to prevent holiday hunger through future school holidays. However, the need to expand the eligibility criteria for FSM remains.

Recent data from the Child Poverty Action Group shows that over 70,000 children living in poverty are not eligible for Free School Meals⁵, meaning that these children will continue to miss out under the £7,400 earnings limit policy, thereby not accessing vital support that they need.

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children living in poverty are not eligible for Free School Meals

⁴ www.jrf.org.uk/file/56856/download?token=KQV2npcS&filetype=briefing

⁵ <https://cpag.org.uk/sites/default/files/files/policypost/CPAG-briefing-for-MPs-and-MSs-on-expanding-FSMs-English.pdf>

Free School Meals are worth around £400 a year per child to a family.⁶ This cost can represent a substantial proportion of a struggling family's income (even if they are in work) – over £1,000 per year for a family with three children. A family with three children currently earning just under the proposed £7,400 earnings limit would lose around £1,200 each year if they were to work a few more hours or get a pay rise. To make up for this they would have to increase their annual wages by almost £3,000 -equivalent to almost a day of extra work every week at the National Living Wage. Even a similar family with just one child would have to work two additional hours every week to make up for the loss of Free School Meals. This also means that many families currently earning just over the proposed earnings limit will be better off overall if they work less or take a pay cut.

In addition, Free School Meals often act as a passport to other support, such as help with school clothing, trips or music lessons, or discounted access to leisure facilities. This means that entitlement to Free School Meals can be worth significantly more to struggling families than just the direct meal value itself.

Free School Meals enable children to have an adequate meal when food may be tight at home. For some disadvantaged children a free school lunch may often be the only healthy cooked food they get, and for some it can be their only meal of the day. Additionally, inaccessibility to this can negatively affect a child's energy levels, mood and engagement with school, which in turn can affect their well-being. The importance of making sure all children in poverty can access a free school meal is clear.

This may be particularly true of children growing up in low income migrant households, who may not be able to access the majority of support provided through the social security system which acts as the gateway to receiving Free School Meals. When schools were closed due to Covid-19, local authorities in Wales were advised to 'exercise their discretion to allow the children of these families to benefit from local authority Free School Meal'⁷, recognising the important role that FSM provision can play in providing targeted support to these children.⁸ Beyond this crisis, it is important that as part of Wales' next parliament, children from families with no recourse to public funds are able to continue accessing Free School Meals.

May's election provides an opportunity for the next Welsh Government to address these issues and ensure that children living in poverty do not miss out on the vital support that Free School Meals provide.

We're calling for parties to commit to removing the £7,400 earnings limit and enable all children of Universal Credit claimants to be eligible for Free School Meals, and to extend eligibility for children with No Recourse to Public Funds to receive Free School Meals.

Free School
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⁶ XXXXXXXX

⁷ <https://gov.wales/free-school-meals-coronavirus-guidance-schools>

⁸ <https://gov.wales/free-school-meals-coronavirus-guidance-schools>

Proposal 3: Improving support for families who are experiencing a financial crisis

For children and young people living in families from low-income households, Covid-19 has added significant additional strain on pre-existing financial hardship. The virus has resulted in people losing their jobs or being furloughed, meaning that parents and carers have lost income and the ability to provide for their children.

This loss of income can and does lead to financial crisis, during which families cannot pay for food, gas and electricity, and other essential items. This can lead not only to poverty, but can also negatively affect the well-being and mental health of children and young people and their parents or carers.

It is during such times of financial crisis that support can be offered via the Discretionary Assistance Fund (DAF). This fund can provide vital support for children and young people and their families, who have lost their jobs, or who are waiting for their first benefits payment to reach them.

In response to the Covid-19 crisis, Welsh Government invested an additional £11 million into the DAF and made the eligibility criteria for accessing the support more flexible (one grant within a 28 day period, and three grant awards in a year).

The most recent data from Welsh Government show that between 18 March 2020 and 18 February 2021 there were 159,706 Covid-19 related Emergency Assistance Payments, with a total paid value of £10.56 million. Additionally, Covid-19-related reasons applicants are presenting include having to stop or reduce work, delays to a benefit claim, and increased energy and food costs due to the family being at home.⁹

With social security remaining a non-devolved area, the DAF is a key lever at Welsh Government's disposal for supporting individuals and families who are facing or experiencing financial hardship or crisis. However, we believe that to bolster the support provided by the DAF, a more comprehensive package of support attached to the DAF should be available for those who need it. Specifically, we believe that as well as financial support, there also should be support offered to individuals and families so as to understand and address the cause of the crisis, thereby best ensuring that they do not require repeat access to the DAF in the future.

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⁹ <https://gov.wales/summary-data-about-coronavirus-covid-19-and-response-it-25-february-2021.html#section-63714>

The DAF is a crucial form of support for individuals and families during a difficult time in their lives. This support is particularly important during the crisis brought about by the Covid-19 pandemic, the effects of which will continue for some time to come. But to enhance this already-important service, an opportunity presents itself for the next Welsh Government to offer an additional service along with the DAF, which would provide support for individuals and families so as to best ensure that they do not need to access the DAF repeatedly in the future.

We are calling on parties to commit to investing in the DAF so as to ensure its long-term future. We also call on parties to ensure that the DAF is a part of a wider package of crisis support, including assistance for applicants who might struggle to access the DAF; referrals to other services and support such as food and furniture providers; and advice and support for claimants to help prevent the need for repeat applications to the DAF such as welfare rights, income maximisation.

Case study – Coordinated Community Support Programme

Accessing emergency financial support can be challenging – with awareness of statutory and other forms of assistance varying, and provision itself patchy across Wales. Closer collaboration and communication between statutory and Voluntary, Community and Faith sector providers is necessary to facilitate equity of access to crisis support schemes.

The locally-led Coordinated Community Support (CCS) programme is being piloted in Swansea with the aim of improving coordination of support available to individuals and families facing financial crisis, and increasing referrals from emergency support providers to other forms of appropriate assistance. In the financial year 2020/21, between April and August a total of £504,531 in DAF payments were awarded in the Swansea local authority area.¹⁰

In helping to build financial resilience and prevent recurrent crises, it is hoped that applications for repeat support will be reduced. The DAF does not currently include identification of applicants' underlying needs or provide follow-up aftercare. The Swansea CCS pilot presents an opportunity to explore the impact giving consideration to these factors would have on repeat applications to the fund.

Ongoing learning from the Swansea CCS pilot will also enable comparison to be made with three pilot areas in England, where no centrally controlled emergency assistance fund exists.



Proposal 4: Make sure young people have access to mental health support when and where they need it.

Children and young people's well-being and mental health has been an issue that has received significant attention during the Fifth Parliament.

Waiting times for Child and Adolescent Mental Health Services (CAMHS) have been a prominent issue in recent years. There is a target for 80% of children and young people to access CAMHS within 28 days of the initial referral. In the most recent data available, it is welcome to see that this target was achieved in January 2020. However, it is important to note that this was before the Covid-19 pandemic, during which children's emotional and mental health has worsened. Furthermore, clinical support is not always the appropriate form of support for a young person, and if they are referred to CAMHS only to be refused access to its support after the waiting time, that can exacerbate the existing issue with which the young person presents. This is why community-based support is so crucial.

While there has been important work done in schools to enable children and young people to access mental health support, such as through school-based counselling, support that is available outside of school settings but that does not require accessing specialist or clinical services is inconsistent across Wales. We refer to these services as 'sub-threshold', meaning that a child can present in a community setting with an issue that does not require clinical support. Responses from our FOI requests last year show the variation in the services that are available across Wales – in one health board there are 19 sub-threshold emotional well-being services for children and young people, and in another health board there are no sub-threshold emotional well-being services.

In their 2018 report *Mind over Matter*, the Children, Young People and Education Committee recommended that 'ring-fenced resource is needed to make schools community hubs of cross-sector and cross-professional support for emotional and mental well-being,' and that other forms of mental health support, such as the role of youth work-led support, has seen 'an alarming decline in provision in recent years.'

Provision in the community outside of the school setting, such as youth work-led support, can be vital for young people who require support and who do not have access to school-based support. It is crucial that young people who do not require specialist services can access more appropriate forms of support in the community. If focus is put on school-based support and specialist services only, a vital third form of provision that can be accessed in a community setting will be missed, thereby leaving young people who need it either unable to access support from schools, or accessing support that may mean a long waiting time or that may not be appropriate for their needs.

Recent Freedom of Information data show that across a number of health boards in Wales during 2018/19 and 2019/20, 7,015 children and young people were referred to CAMHS but did not reach the threshold for requiring access to CAMHS.

This outcome can be very damaging, because both the waiting time and the rejection of support could exacerbate a young person's presenting issue. This is an issue that could be addressed with appropriate support that can be accessed in the community. This would mean an end to referrals to support that is not appropriate, and removes the risk of waiting up to four weeks or more for support only to not be granted access to it.

Community services are crucial in providing preventative and early intervention support to prevent difficulties escalating, and in avoiding additional pressure being placed on specialist services later down the line.

Community-based support can be delivered through open-access hubs which are designed to offer easy-to-access, drop-in support on a self-referral basis for young people with emotional health and well-being needs, up to age 25. These services can be delivered through the NHS, in partnership with local authorities, or through the voluntary sector. A mix of clinical staff, counsellors, youth workers and volunteers provide a range of support on issues related to well-being, while different services can be co-located under one roof, offering wrap-around support across, for example, psychological therapies, housing advice, youth services, employment support and sexual health – areas that are known to have a negative impact on mental health and well-being if left unaddressed.

Research has shown that young people respond better to services that are youth specific. Many of these services take a youth work approach to support, where work is centred on the young person in terms of their strengths and needs, and listening to their voice. What is more, involving young people in the systems that relate better to their needs has been noted as an important step in engaging them in their mental health treatment.

The 2021 election provides the next Welsh Government an opportunity to ensure that all young people are able to access support suited to their needs, and that is accessible to them. This means giving as much attention and resource to community-based support as has been given to school-based support and clinical support. Although there are health board areas in Wales in which there is good provision for young people, this is not consistent across the country, meaning many are unable to access this crucial form of support.

We are calling for parties to commit to investing in community-based emotional well-being and mental health support, to ensure that every child and young person is able to access support at a time and place that works for them, wherever they live in Wales. This includes children who may not be able to access services in schools and for whom a clinical level intervention is not appropriate.

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Building a Wales that works for all children

The Covid-19 pandemic has affected the lives of everyone, and for many it had brought incredible hardship or exacerbated difficulties that had already existed.

The work to recover from this pandemic has begun, and the decisions of the next Welsh Government will define the futures of a generation whose lives have been turned upside down. The next Welsh Government will not only need to address the long-term impacts of Covid-19, it will need to do so in a way that puts children's well-being first.

Every party standing on 6 May needs to set out an ambitious vision for every child in Wales. The next Welsh Government will not be able to achieve this vision alone. It will require partnership, coordination and long-term thinking. The Children's Society is ready to work with the next Welsh Government and the next Welsh Parliament to tackle the issues holding too many children back – such as poverty, abuse and exploitation, and mental ill health – in order to build a society that works for every child.

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