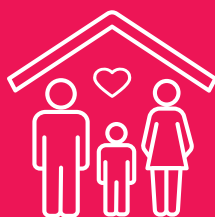




**Comisiynydd
Plant Cymru**

Children's
Commissioner
for Wales

Annual Report & Accounts 2023-24



www.childrenscommissioner.wales



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**Comisiynydd
Plant Cymru**

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Mae fersiwn Cymraeg o'r adroddiad yma ar gael ar ein gwefan, o dan 'Cyhoeddiadau'. A Welsh language version of this report is available on our website, under 'Publications'.

01 FOREWORD

by the Children's Commissioner
for Wales

Welcome to my annual report
which details the work undertaken
by myself and my team during
my second year as Children's
Commissioner for Wales.



It's my role as Commissioner to be here for all children, so this is why I purposefully set out to reach a diverse range of children and young people and I'm proud to say that during the year I've continued to meet and hear directly from thousands of children right across Wales, and have visited children in every single local authority in Wales.

I've heard directly from children and young people from a wide range of backgrounds and in many different settings, including children and young people in residential settings, in hospitals, youth clubs and schools, and with disabled, ethnic minority and refugee children and young people, as well as those who identify as LGBTQ+. In January 2024, my office launched a new way of hearing from children and young people via an initiative called Monthly Matters, where we've heard from around 1500 children and young people every month, on topics so far including school dinners, and priorities for the new First Minister.

I also want to be **a rights realiser** – to turn children's rights into reality – and I'm pleased to report that this year my Advice team supported hundreds of children on a range of issues, including a high number of these on issues related to children's right to education, as well as children involved with social services. Following a pilot project, this service (previously called the Investigations and Advice service) was renamed as the Children's Rights Advice and Assistance service – we hope this is a friendlier and more approachable name – while continuing to firmly challenge individual breaches of children's rights.

This year, I also published the findings of my national survey [Ambitions for Wales](#), based on over 10,000 responses, which informed my new three-year strategy '[Making Life Better for Children in Wales](#)', with the four strategic priorities identified

being child poverty, mental health, equalities and education/ Additional Learning Needs. I've aimed to be **a truth teller**, sharing, through publications, meetings, and media work, children and young people's truths with the public, and with those in positions of power. To this end, we've published two important reports this year shining a light on specific issues: [Education in Healthcare](#) and [Racism in Secondary Schools](#).

Sadly, this year the cost of living crisis has continued to dominate and blight children's lives. As such, I've **challenged** and spoken out **strongly** on this topic, but I've also wanted to ensure that my office collaborates with other groups who share our concerns so we can be stronger together. I was therefore very pleased to work with Swansea University Observatory on Children's Rights and Children in Wales to co-host a Child Poverty Summit in November 2023. In the context of a continued squeeze on public finances, it is more important than ever that children's rights are protected. Therefore, my team and I have also continued to challenge public bodies to apply 'The Right Way: A Children's Rights Approach' to decision making, and in March 2024 we hosted a Seminar with over 90 practitioners on this topic.

All of this work has been delivered by my dedicated staff team of 22, and guided by my two Advisory Committees (Adult and Young People's) and my Audit and Risk Committee. I extend my deep thanks and appreciation to them all.



Rocio Cifuentes MBE
Children's Commissioner for Wales

OUR WORK PLANNING FRAMEWORK



02



03

HERE FOR ALL CHILDREN

We listen and make sure we're accessible to all children in Wales to ensure we can effectively speak out on their behalf and represent them in the most impactful way.



The Commissioner, supported by our Engagement team, engages with children across Wales, listening to children, supporting those who work with children, and helping children and adults to find out more about children's rights.

Here are some highlights of our engagement work this year:



10,953

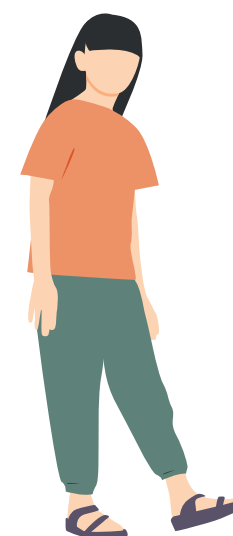
Over the past year we've engaged with 10,953 children and young people from all over Wales

94% of group leaders/teachers answering a survey described our engagement sessions as 'very good'

We engaged with children from every local authority:



We've engaged with young people in a breadth of settings, including primary and secondary schools, youth clubs, special schools, specialist provisions, community groups representing a broad range of children and young people, and engaged with children and their parents in prison.



Our three-year plan commitments we've delivered this year:

- * We worked in partnership with others on critical issues affecting children, including the Welsh Language Commissioner on a [position paper](#) about the Welsh language and Additional Learning Needs (ALN) system in Wales. This joint work has informed the actions of the Welsh Government's workstream on ALN and the Welsh language, which includes development of workforce support and resources.
- * Forged partnerships to enable us to work in collaboration with others, including Young Wales/Children in Wales, the all Wales participation workers' network, Senedd Ieuenctid Cymru and the Children's Legal Centre at Swansea University.
- * We worked collaboratively with the Observatory on Children's Rights and Children in Wales to host Wales' first Child Poverty Summit, producing this [summit report](#).
- * Made use of the data we gathered from children and the data others have gathered in our influencing work and published a [comprehensive analysis of our Ambitions for Wales consultation](#).
- * Plugged evidence and engagement gaps with specific groups of children, including care-experienced children and published our first set of [corporate parenting commitments](#).
- * Continued working with the Senedd Ieuenctid to improve our accountability to children in Wales.
- * Completed work on a comprehensive new engagement strategy for the organisation.



04 A RIGHTS REALISER

We support and educate children and young people to access their rights and to know about and understand their rights, and we support and advise public services on promoting and protecting children's rights.



We've helped adults who work with children to know about children's rights. Including:

- A children's rights learning and sharing event in March, attended by over 80 professionals. It focused on showcasing best practice from across the public sector and inspiring others to put rights at the heart of their work.
- Held training for early years professionals, schools, health boards, councils, and taken part in workshops on anti-racism and child poverty.

Our free and independent Children's Rights Advice and Assistance Service is there for children, their families and professionals who think children's rights have been breached. We work to resolve those issues and feed in case work examples as evidence of wider changes we believe are required to protect children's rights and improve children's lives in Wales.

Here are some highlights from the Advice service's work this year:

We have been working hard to review and refine our Advice function in the last year, to further develop the Children's Rights Advice and Assistance Team of the Children's Commissioner for Wales, ensuring the service acts as a source of timely and accurate advice, support and information for children and young people in Wales (and those who care for them) who feel they have been treated unfairly.

During 2023-24 we ran a pilot project to increase the visibility and accessibility of our service, to ensure our advice service is widely promoted, understood and accessible to all children and young people in Wales.

We reached out to a range of third-sector organisations to make online presentations and workshops to promote the service and gather views directly from children and young people on how to improve our visibility and accessibility. The pilot project resulted in the service being renamed the 'Children's Rights Advice and Assistance Team'.



Cases supported



During the year, the team had:

1639

Incoming calls

(including from parents, extended family members, members of the public, children and young people, third sector organisations, foster carers, education professionals and advocacy services).

2230

Outgoing calls

4337

total activities and interactions

658

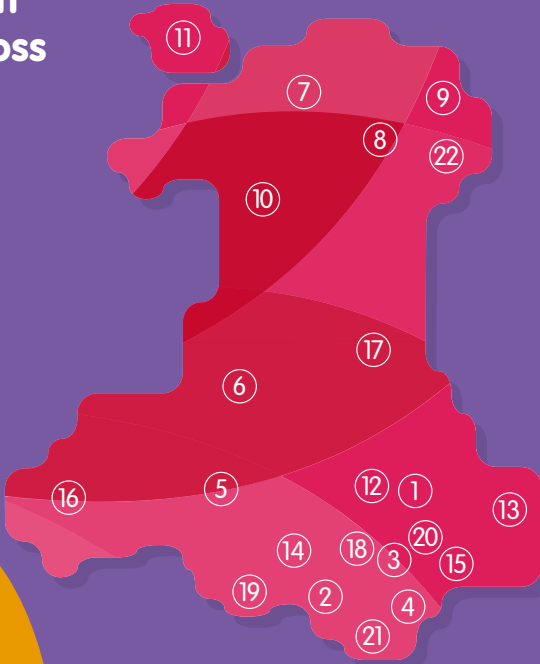
individual cases

we worked on a total of 658 individual cases, supporting them with 985 issues.



We supported children from every Local Authority in Wales.

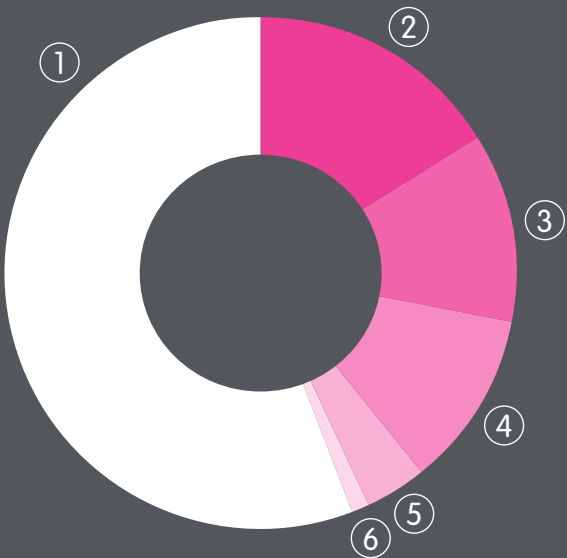
Where all the cases have come from authorities across Wales



Local authority	Number of cases
1. Blaenau Gwent	4
2. Bridgend	38
3. Caerphilly	17
4. Cardiff	72
5. Carmarthenshire	20
6. Ceredigion	15
7. Conwy County Borough	16
8. Denbighshire	8
9. Flintshire	23
10. Gwynedd	10
11. Anglesey	3
12. Merthyr Tydfil	22
13. Monmouthshire	10
14. Neath Port Talbot	42
15. Newport	40
16. Pembrokeshire	18
17. Powys	29
18. Rhondda Cynon Taf	60
19. Swansea	47
20. Torfaen	12
21. Vale of Glamorgan	42
22. Wrexham County Borough	17
23. Other	18
24. Unknown	73

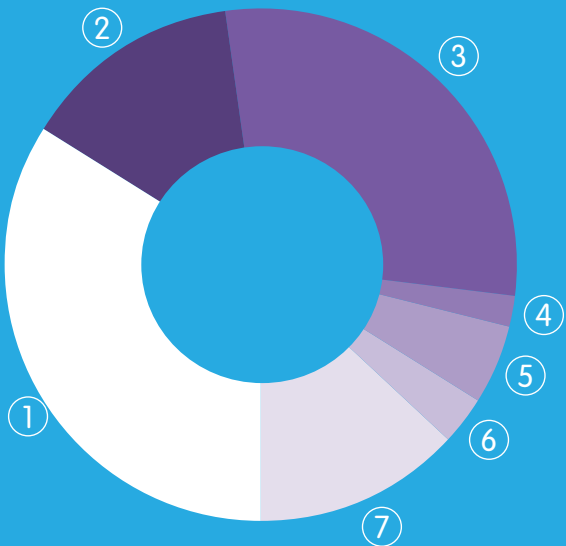
Referrers:

	%
1. Parents/Carers	56
2. Professional	16
3. Member of the public	12
4. Extended family member	11
5. Child or Young Person	4
6. Elected representative	1



Breakdown of Issues:

	%
1. Education	34
2. Education ALN/SEN	14
3. Social Services	29
4. Housing	2
5. Health	5
6. Community	3
7. Out of remit	13



Our Advice team supported children and young people on a wide range of issues during the year, however the most commonly presenting themes related to Education (34%), Social Services (29%) and Additional Learning Needs/ Special Education Needs (14%).

Within the category of Education, common issues included school complaints, school exclusions, transport to school, education other than at school (EOTAS) and safeguarding-related concerns. Within the category of Social Services, common queries related to complaints, funding and provision of placements and safeguarding. In relation to ALN/SEN, the advice we offered frequently related to ALN assessments, Individual Development Plans (IDPs), transport, placements and provision. As part of our service, our team advise and signpost, as well as make representations to providers on behalf of the child to support them in accessing their rights.

Case studies

Case study 1

We were contacted by a whistleblower, who had significant concerns about the way children and young people were being treated in the place that they worked.

We were able to put the whistleblower at ease which enabled them to share the concerns that they had. We were told about bullying, intimidation, inappropriate

language and behaviour of one of the members of staff who were there to support the children in their care. In line with our policies and procedures we shared with the local authority the allegations that had been shared with us. The local authority initiated an investigation into the allegations that we had shared.

Case study 2

We were contacted by a Year 11 pupil who rang us on behalf of other pupils as well as themselves. They raised concerns around the lack of access to the school toilets during the day – the school had been locking the toilets for some months. Pupils had raised their concerns about this with the school council but nothing changed. On the day CCfW were contacted, pupils had been told they could not have the key to the toilets and that they would need to use the disabled toilets. There were only 2-3 disabled toilets and several hundred pupils in the school.

We advised the pupils that they or their parents could make a formal complaint about the situation and sent them the appropriate information to enable them to do

so. We also asked if they would like us to make direct contact with the school and raise their concerns on their behalf and they gave us permission to do so.

We subsequently contacted the Head Teacher who was unaware of this practice of locking the toilets - it was on a different campus to them. However, the Head Teacher acted immediately on this information and assured us it would not happen again. The Head Teacher was also glad that the pupils had been able to raise concerns with us. The Head Teacher asked us to relay to the pupils that if they had any other concerns moving forward to either go directly to them or to CCfW to ensure their voices were heard.

The pupils remained anonymous during this time.

Our three-year plan commitments we've delivered this year:

- ★ Worked with schools and education settings to support them with the new duty within the Curriculum for Wales on children's rights by refining our Ambassador offer.
- ★ Refined our 'Right Way' offer, supporting public bodies to follow a children's rights approach in planning and delivering services, including hosting a practice exchange where over 80 professionals attended.
- ★ Organised a number of professional learning opportunities for our staff team with community-based organisations supporting children and young people across Wales.
- ★ Worked with the Welsh Government on the development of professional learning modules all about children's rights.
- ★ Explored with Welsh Government and partners the concept of a 'child-friendly' focus for awareness raising work.



05 TRUTH TELLER

We will support and empower children to speak out and share their diverse experiences with decision makers. We will shine a light on specific issues through our enhanced communications and engagement work.



Our staff restructure this year has brought together the participation and communications staff, establishing an engagement team. This has resulted in more efficient methods to shine a light on issues affecting children and young people via traditional media and social platforms.

Here are some highlights of this work:



We secured over **171 separate pieces of print and broadcast** coverage for the commissioner's work, generating over **1bn** opportunities to read or hear about the commissioner.

Our highlights this year:

Being a leading voice on child poverty in Wales, holding the Welsh Government to account through scrutiny committees and across a range of news outlets including Channel 4 News.

Shining a light on the issue of education in healthcare settings through a BBC Wales news piece, leading to further discussions on the topic in the Senedd.

Our children's rights song, *We Stand Together*, has now been listened to approximately **44,000** times on SoundCloud.

Increased our Instagram reach by **300%** compared to the previous year.

Our **YouTube** videos were viewed **11,000** times, including videos on children's rights, equality, and an introduction to the Children's Commissioner.

Sharing children's views on school dinners through extensive media coverage, including UK-wide platforms like BBC Newsround and The Week Junior magazine.

Our focus on racism in secondary schools, and securing front-page news coverage for this hugely significant issue.



The team restructure has also enabled us to focus time on creating more innovative ways of capturing and then shining a light on issues affecting children's lives. **Monthly Matters**, our new discussion and snapshot survey pack for schools, launched in January 2024, and achieved the following in its first three months:



January – **1147** children and young people told us how they felt about Welsh Government's proposed changes to the school calendar. We used what they told us to write our official response to the Welsh Government consultation.

February – we heard what **621** children and young people wanted from the new First Minister. We presented their views to Vaughan Gething when he was appointed.

March – school dinners, our topic in March, drew **1743** responses from children and young people. We heard that children were often hungry after their meals and weren't always able to have fruit and vegetables. We shared their views with decision-makers and spoke out about the issue across the media.

We publish a short report after each of our snapshot surveys on our website.



Our three-year plan commitments we've delivered this year:

- * Making sure children and young people are supported to recover well from the Covid19 Pandemic: We were proud to be selected as a Core Participant in Module 2B of the UK statutory inquiry into Covid-19. We were the only core participant in Wales representing children's issues.

The office submitted witness statements to the Inquiry, along with a substantial series of documentation, including published reports and papers, but also a large volume of meeting notes and correspondence from 2020-2022. The papers submitted to the Inquiry illustrated the key role of the office during that time

in gathering children and young people's views and experiences and taking these to Welsh Government to input into their decision-making processes.

The Inquiry came to Wales in February and March 2024, where the Commissioner during the Covid Pandemic, Professor Sally Holland, gave oral evidence. The office was legally represented throughout the hearing and submitted some additional questions, notably in relation to the Government's approach to children's rights impact assessments and whether or how these were used at the relevant time to shape the decisions that were taken. Our submissions are published on the UK Covid Inquiry website [here](#). Our evidence session secured [media coverage](#) focusing on the issue of school closures during the pandemic.

* Presenting children and young people's experiences of racism in Wales' secondary schools.

Our report, published in November, showed that very many children and young people experience racism and racist incidents within secondary school, and few have confidence in how this is dealt with. Teachers and stakeholders discussed similar experiences, echoing issues of lack of confidence and lack of clarity on how to respond to these incidents.

During this project we spoke to 170 children and young people from a diverse range of minority backgrounds, from local authority areas spanning the breadth of Wales. We also heard the views and experiences of teachers, head teachers and other educators from seventeen schools, in addition to speaking with experts and stakeholders in the field.

We made 22 recommendations to a range of bodies, including the Welsh Government and local authorities. They included strengthening guidance, introducing a new national system for recording racist incidents, and compulsory anti-racism training for staff.

Welsh Government have formally responded to this report and its recommendations in July 2024. Welsh Government have accepted, accepted in principle or accepted in part 11 of the 14 recommendations which were directed at Welsh Government, including the commitment set out within the report including the commitment to update statutory anti-bullying guidance, develop further training and professional learning resources, further support training for school Governors and develop mechanisms to improve the process of recording and reporting racist incidents in schools.

* Highlighting a lack of provision of key services including education in healthcare settings.



Education in healthcare settings

This work came about following concerns raised with us by professionals working with children and young people in hospital settings that their educational needs were not being met.

Following these concerns, our research found that too many children across Wales simply aren't getting access to education as they should, and that they have fewer entitlements than children in England. We recommended that Welsh Government reviews local authorities' legal duties to provide full-time education to children in health care settings. We recommended that they updated guidance to ensure that the expectations on local authorities to support children's education in healthcare settings are clearer.

Welsh Government formally responded to those recommendations in March 2024 and stated that they will update the *Supporting Learners with Healthcare Needs* guidance, to set out duties and expectations on local authorities. They will also update guidance to set out that the expectation is that learners receive around 25 hours per week of education when this takes place outside of school, unless it is not in their best interest to do so. At the time of writing, we are awaiting these changes.



06 CHALLENGER

We will challenge and support others to ensure children's rights are realised. Although we want to work in partnership, we won't be afraid of continuing to call out poor services, poor decision-making, and poor choices if they negatively affect children's lives.



Our policy work sees us influence decision-makers, including Welsh Government, to consider and uphold children's rights in all decision making. When promises are made by public bodies, we'll make sure we follow up on those to make sure promises to children and young people are kept.

This year we:



Responded to 21 formal consultations, including 14 Welsh Government consultations and four consultations from Senedd Committees/Members. Topics included access to education, migration and asylum matters, safeguarding, housing issues, school attendance and pupil wellbeing support, mental health, and child poverty



Secured at least 47 mentions of our work and calls for change in plenary and Senedd Committee work



Gave oral evidence on four occasions to Senedd Committees



Our three-year plan commitments we've delivered this year:

- * Challenged the progress made in tackling the cost of living crisis and child poverty levels in Wales, via evidence to Senedd Committees and the Welsh Government consultation on the draft child poverty strategy; through correspondence and meetings with Ministers and officials as well as attending the Expert Reference Group; via the inaugural national child poverty summit detailed further in our influencing work (Key Policy Areas & Recommendations) and securing network broadcast coverage of our criticism of the strategy.
- * Continued to call for free public transport for children, including in evidence to the Petitions Committee, via extensive media coverage, the Welsh Government Attendance Taskforce and at the inaugural Attendance Conference hosted by NAEL.
- * Challenged via a written consultation response, correspondence and meetings with the relevant Minister and numerous officials, the effectiveness of governance structures of Wales' child practice review procedures.
- * Challenged through meetings with every health board in Wales, and the Minister, the lack of appropriate mental health support in matching the needs of children and young people in Wales. We also published a policy position on mental health which you can read on [our website](#).
- * Improved the way information flows internally within the organisation, via a restructure and new data capturing methods, so that we achieve the most impact from the evidence and intelligence we gather about children's lives.

07 KEY POLICY AREAS & RECOMMENDATIONS



This section of our report sets out key work we have undertaken across a range of policy areas during the year. We make recommendations to the Welsh Government, for them to provide a formal response in due course.



As in previous years, this section is structured around the four indicators for the protection, respect and promotion of children's rights, developed by the European Union Agency for Fundamental rights, which is aimed at assessing the impact of legislation and policies, identifying their achievements and revealing any gaps in provision for children.

To begin with, we have also highlighted some key areas of work that we have undertaken related to our strategic priority areas. Whilst we do not expect a formal response from Welsh Government on these matters, they are included to demonstrate the breadth of work undertaken and the different ways in which we work to secure positive outcomes for children in Wales.



Strategic priority areas of focus

Under our three-year strategy, we have four strategic priority areas: mental health, child poverty, education and additional learning needs, and equalities.



Mental health

During 2023-24 the Commissioner met with representatives of all seven health boards in Wales to discuss mental health, neurodiversity and eating disorder services.

The Commissioner then relayed her findings to the Minister for Mental Health and Early Years in Welsh Government, as well as with Healthcare Inspectorate Wales, who are currently conducting a joint review with Care Inspectorate Wales and Estyn, into how healthcare, education and children's services are supporting children and young people's mental health and wellbeing.

During 2023-24 the Commissioner has visited examples of new mental health sanctuary models for children and young people, including the Bro Myrddin Wellbeing Hwb in Carmarthen which provides a 24/7 safe place for 11-18 year olds struggling with their mental health and wellbeing. The Hwb is designed to respond to the individual needs of children and young people, bringing the right professionals to that young person, rather than them needing to navigate complex services themselves. Several other hwbs now exist across Wales, with more being developed.



Child poverty

This year we have:

- Jointly hosted a Child Poverty summit together with Swansea Observatory on human rights, and Children in Wales. Over 80 people attended this in-person event in November 2023, which produced [this report](#) of findings and suggestions for practice improvements including the benefits of a children's rights approach to address issues of child poverty. Actions for change in the report outline measures for organisations to take including meeting basic need, access to services, education, health, disempowerment and discrimination.
- Provided written and verbal feedback to the Welsh Government throughout the development of the revised Child Poverty Strategy, which was published in early 2023. Work has continued in relation to this strategy, to try to ensure that the monitoring framework and accountability mechanisms such as reporting are sufficiently robust to show not just how much money has been spent, but who it has reached and what impact it has had or is having.
- Met with key stakeholders including local and national government in relation to universal free school meals, and the wider free school meals offer for older children. Issues raised include ensuring support for those formerly eligible for free school meals continue to be provided, and in relation to provision for children from families with no recourse to public funds.

Additional learning needs (ALN)

We have:

- Dealt with cases via our Advice team related to additional learning needs – 14% of the total case work this year related to additional learning needs.
- Attended the Welsh Government ALN Reform National Steering Group as observers, discussing issues relating to Welsh Government ALN policy. This includes positioning ALN as a national education priority; encouraging multi-agency working and collaboration; and support with ongoing implementation of Additional Learning Needs and Education Tribunal (Wales) Act 2018.
- Published a paper jointly with the Welsh Language Commissioner on the specific needs of children with ALN, in Welsh medium settings; and presented the paper to a range of audiences including the Welsh Government working group on ALN and Welsh medium education.
- Contributed to the Education Tribunal Wales User Forum meetings.
- Contributed evidence to the Senedd Children, Young People and Education Committee’s inquiries into disabled children’s access to education and childcare, and the implementation of the ALN legislation.
- Undertaken a thematic analysis of issues arising through our Advice team’s work, to create a video output of illustrative experiences of families under the new legislation, and to inform our contributions to the above pieces of work. Notable themes included:
 - Children from very young ages being without suitable provision to meet their needs
 - Increased use of severely restricted timetables, resulting in lack of access to sufficient and suitable education
 - Conflict between schools and local authorities on ownership of children’s Individual Development Plans (IDPs) and the responsibility for making provision to meet the identified needs within those plans
 - Significant delays in children being able to access assessments with educational psychologists and/or for diagnosis of neurodivergent conditions.
 - The point above is affecting children’s access to suitable provision including specialist school places, despite the system being intended to be needs led and not reliant on a diagnosis.



Equalities

Our work in relation to equalities in this year has primarily related to our dedicated project examining the experiences of racism in secondary schools, as noted previously within this report.

Our report, published in November, showed that very many children and young people experience racism and racist incidents within secondary school, and few have confidence in how this is dealt with. Teachers and stakeholders discussed similar experiences, echoing issues of lack of confidence and lack of clarity on how to respond to these incidents.

During this project we spoke to 170 children and young people from minority diverse range of backgrounds, from local authority areas spanning the breadth of Wales. We also heard the views and experiences of teachers, head teachers and other educators from seventeen schools, in addition to as speaking with experts and stakeholders in the field.

We made 22 recommendations to a range of bodies, including the Welsh Government and local authorities. They included strengthening guidance, introducing a new national system for recording racist incidents, and compulsory anti-racism training for staff.

The following section will focus on key work we have undertaken across a range of policy areas during the year. Included within this section are our recommendations to the Welsh Government.



FAMILY ENVIRONMENT AND ALTERNATIVE CARE

FAMILY ENVIRONMENT AND ALTERNATIVE CARE

Children's Social Care: corporate parenting

Children living in alternative care, those with care experience, are often described as having the 'state' as their corporate parent. The local authority they are from is given formal parental responsibility by the courts, but they are dependent on statutory agencies across the public sector for their care and wellbeing.

For years, the Welsh Government has been working on revisions to the guidance for 'corporate parents'. Our office has been represented on various iterations of working groups, but it has taken some time to come to fruition.

In September 2023, the Corporate Parenting voluntary charter was launched. Unlike the approach in Scotland for example, which prescribes a range of statutory organisations across the public sector as corporate parents, with actions attributed to this status, it is up to individual bodies in Wales whether they sign up at all, and/or what their commitments look like.

Our office has signed up and published a series of promises to care experienced young people, in line with the Charter. We hope that this will be an example to other organisations as to how to translate the Charter into meaningful actions but feel that more could and should be done to require organisations to commit to responsibilities in this area.

Summarised UN Concluding Observations related to this work:

20. *The Committee urged the state party to implement targeted policies and programmes to combat and eliminate discrimination against children in disadvantaged situations, including children in alternative care.*
23. *(a) Ensure the right of all children, including children in care, to express their views and to have them taken into account in all decisions affecting them; and 38. (g) To ensure that children are heard in decisions affecting them in alternative care placements and that authorities and professionals have the expertise required to ensure respect for children's views in alternative care.*
38. *(h) To strengthen measures, including by increasing funding, aimed at providing education, skills, housing and opportunities for independent living for children leaving alternative care.*

Recommendations

- Welsh Government must increase awareness of and sign up to the Corporate Parenting Charter, including setting targets for sign up, as part of a published plan to raise the profile of the Charter and its importance to care experienced children's lives.
- Welsh Government must also monitor the implementation by public bodies of the Corporate Parenting Charter and its impact on children's lives and set out in their response to this report how this will be evaluated in order to assess whether further statutory incorporation is required.



PROTECTION FROM EXPLOITATION AND VIOLENCE

Safeguarding: Single Unified Safeguarding Reviews (SUSR)

Safeguarding children is a vital part of public services' role, and learning lessons across the country when something has gone wrong is essential to try to prevent similar tragedies from occurring again.

Child practice reviews (CPRs) are to be subsumed into a new universal type of review, the Single Unified Safeguarding Review (SUSR). Whilst it is welcome to bring differing review processes together, there are existing issues with the governance and accountability of CPRs, so we are worried that these have not been sufficiently addressed before commencing the SUSR process.

81% of the respondents to the public consultation on the proposed SUSR guidance raised concerns in relation to governance. We followed up our concerns with Ministers and officials throughout the year, as well as discussing the matter with the National Independent Safeguarding Board and at various working groups and workshops.

Our concerns are about ensuring that:

- lessons from Reviews are shared and actions are identified on an all-Wales basis, and who will be responsible for achieving this;
- action plans that are intended to implement recommendations from Reviews are taken forward and achieved, and who will have oversight of this; and
- recommendations from Reviews are suitably framed so they don't just apply to the regional area undertaking the Review; whether/how individual boards can direct others across Wales in this regard.

We had asked to see revisions to the guidance to be assured that these points were being acted upon, but we have not had sight of any updates or changes. Implementation of the SUSR process was delayed from April to September 2024, but it remained unclear what if any changes were being made to address these concerns.

It is vital that Review recommendations are implemented comprehensively across Wales to prevent future tragedies occurring for the same reasons. When we talk about accountability, this is not about blaming people for things that have occurred but about implementing change in a timely and consistent manner.

Summarised UN Concluding Observations related to this work:

33. (a) the need to ensure that child protection systems take a child rights-based approach to preventing and addressing cases of abuse and neglect;
33. (k) To ensure the systematic collection and analysis of data on child protection issues and violence against children to inform the implementation of national strategies.

Recommendations

Welsh Government must ensure that the SUSR guidance addresses the significant concerns that we have raised so that Review recommendations are implemented comprehensively across Wales.

This includes:

- Specifying how lessons from all Reviews will be shared across all Boards and relevant agencies in Wales, and whose role it will be to do this on a proactive basis;
- Clarifying who within Welsh Government will have oversight of the action plans that are intended to implement recommendations from Reviews, to make sure they are taken forward and achieved not just in the Board area responsible for that Review but, where relevant, across Wales; and

- Setting out whether Welsh Government officials and/or National Independent Safeguarding Board will advise on the wording of recommendations from Reviews, to ensure they are suitably framed to make sure they are targeted at the right body or bodies, so they don't just apply to the regional area undertaking the Review. This includes recommendations that apply on a national basis, so some further independent oversight or input is likely to be required.

EDUCATION, CITIZENSHIP AND CULTURAL ACTIVITIES



EDUCATION, CITIZENSHIP AND CULTURAL ACTIVITIES Additional Learning Needs (ALN)

As a strategic priority area, we have continued to scrutinise ALN reform and have played an active part in the Welsh Government ALN Implementation group. From this, we are aware that Welsh Government has planned work to include a review of resources to support shared understanding of the ALN code and Implementation; a technical guide to implementation; parents' guide to implementation, children's guide to implementation, ALN system young people's guide, and a guide to support parents to understand their rights.

We have continued to receive a high level of casework related to ALN provision which has provided us with insights into the key challenges facing children and their families. Significantly, this relates to lack of provision as well as inconsistencies in the interpretation and implementation of the ALN code.

We have also heard from parents and carers, as well as teachers and educators about the challenges they face due to insufficient resources to meet the needs of children with additional learning needs. We are seeing examples regularly in our casework of children being placed on reduced timetables, or providing little meaningful support at all as the provision simply isn't there in the local area.

We were made aware of concerning correspondence to parents and carers from schools and local authorities relating to the financially challenging situation facing schools, declaring that cuts were being made or considered to provision for children with additional learning needs stating "we have no choice but to do this; there is simply no money for us to carry on". As a result, we have urged Welsh Government to ensure that financial decision making takes a children's rights approach and prioritises those in most need of support at school.

Additionally, we have continued to highlight that more must be done to tackle the costs of the school day, and the costs of transport to and from school for those children for whom this incurs a financial cost, we called for the Learner Travel Review to be completed, although we were disappointed that this was not a comprehensive review and did not address previously identified gaps and shortcomings.

Consequently, we are concerned that the ambitions of the ALN Act are not currently being delivered across Wales. We must prioritise funding for this.

Recommendations

- Welsh Government should expedite their planned work to produce technical guidance for Local Authorities on implementing the ALN code, and should publish this no later than March 2025.
- Welsh Government should ensure that funding for ALN provision is put on a firm and sustainable footing, with effective planning and monitoring of spend on ALN.

EDUCATION, CITIZENSHIP AND CULTURAL ACTIVITIES

Food in Schools

In April 2024, we heard the views of around 1,750 children and young people aged between 7 and 18 on what they thought about school meals. Only 19% of children taking part in a survey about school dinners said they are full after their meal. Almost half (44%) said they can't have more food (seconds) if they ask for it. Almost a quarter (24%) of children said they can't always have vegetables if they want them, and 22% said they can't always have fruit if they want it.

The Welsh Government is undertaking a review of the Nutritional Standards in Schools regulations. We have met with officials to encourage them to involve children and young people from the outset of this work. Our monthly matters consultation reinforces the importance of this topic and the need to address issues that may be present across our schools.

It is essential that this review results in improved quality and options for children and young people's school mealtimes and, importantly, that it is properly informed by the views and experiences of children and young people themselves.

During the year we've also heard about differences in how local authorities support children whose families have the status "no recourse to public funds" or "NRPF". The current guidance around free school meals allows local authorities the discretion to provide meals for children from NRPF families, but not all local authorities choose to use this discretion. This means that children's entitlements are being linked to their parents' status, which does not accord with the rights of the UNCRC, particularly article 2 (non-discrimination). Despite having a 'universal' offer of free school meals now for primary school children, we have the situation where children from NRPF families are not automatically eligible to receive a meal, whereas those from families with high resources would be granted a meal. In England, all children of NRPF parents and/or carers are eligible for free school meals.

The shift to UPFSM must reference the Nation of Sanctuary Plan which requires the Welsh Government to support refugees and asylum-seeking children to have a healthy start in life, including to *work with Public Health Wales and Health Boards to ensure refugees and asylum seekers can access vaccinations and other aspects of the Healthy Child Wales Programme (HCWP)*. It must also reference the UNCRC and the duties on the Welsh Government to have due regard to the UNCRC in exercising all of their functions, which includes publishing and reviewing national guidance.

Summarised UN Concluding Observations related to this work:

12. (b) improved data collection in relation to food insecurity and malnutrition;
12. (e) Strengthened measures to address child malnutrition, food insecurity and growing trends in overweight and obesity, including access to nutritious foods, expanding the free school meals programme, addressing the root causes of food insecurity, providing nutrition services in schools; and promoting healthy lifestyles.

Recommendations

- Welsh Government must amend guidance on local authority's discretionary use of eFSM for children and young people whose parents and/or carers have No Recourse to Public Funds (NRPF).
- Welsh Government must ensure that the views and experiences of children and young people authentically inform the review of the Nutritional Standards in Schools regulation, and that a diverse range of voices are heard, including those from neurodiverse children.

EDUCATION, CITIZENSHIP AND CULTURAL ACTIVITIES

Asylum Seeker and Refugees – access to services

Refugee and Asylum Seeker children are some of the most vulnerable members of our society, having to navigate complex systems in a new country. Welsh Government's commitment to being a Nation of Sanctuary is welcome, and is supported by the Anti-racist Wales Action Plan, however it is important that the rights of refugee and asylum-seeking children continue to be considered throughout the implementation of the Anti-racist Wales Action Plan.

It is essential that unaccompanied children and young people seeking asylum are able to access the support they need and are entitled to. A Guardianship service would serve to promote children's rights under the UNCRC and ensure unaccompanied children and young people can access the support they need.

The "Migrant integration: research on immigration legal advice Services" [report](#) in 2023 sets out the recommendation to "Consider creating a guardianship scheme that includes all unaccompanied and separated children, similar to that currently in place for trafficked children in Wales and for all unaccompanied children in Scotland." This is reinforced by [calls](#) from the Children's Legal Centre, Bevan Foundation, The Children's Society and British Red Cross, for a national Guardianship Service for all Unaccompanied Children in Wales, and by the UN Committee on the Rights of the Child recommending that a Guardianship Service should be introduced for all Unaccompanied Children in their Concluding Observations in 2023.

Public transport has been highlighted as a key issue and barrier to children being able to access their rights. In February 2024, we met with young Asylum Seekers and Refugees who shared with us a range of issues, including their barriers to transport and how these impacts on their access to education. During this visit, a young person told us that their bus pass can cost up to £25 a week to travel to college. This leaves them with £15 out of a £40 weekly budget.

Access to public transport for refugee and asylum-seeking children is critical in supporting vulnerable children and families who may be experiencing financial hardship and poverty, as well as ensuring children and young people can access their rights to education, health and to access essential services. We are disappointed that Welsh Government's Welcome ticket scheme came to an end in April 2024 with no substitute provision or offer in place. We understand that Welsh Government are considering options around this scheme and would urge that the re-introduction of this scheme is considered as a matter of priority, including how it can be extended to asylum-seekers in Wales.

Summarised UN Concluding Observations related to this work:

46. (d) ensure that measures to combat poverty comply with a child rights-based approach and include a particular focus on children in disadvantaged situations, especially ... children belonging to other minority groups, asylum-seeking and refugee children.

Recommendations

- Welsh Government should confirm their support for the implementation of a National Guardianship service for unaccompanied children in Wales, and actions that will be taken to pursue this.
- Welsh Government must prioritise the review of the Welcome Ticket Scheme and further consider how this can be extended to children seeking asylum in Wales, with a revised scheme published and in place by the end of 2024.

EDUCATION, CITIZENSHIP AND CULTURAL ACTIVITIES

Racism and Community Cohesion

Over the year, we have been increasingly concerned by the broader political narrative around sanctuary seekers, ethnic minority groups, religious minorities, and community cohesion, and the implications this has had within Welsh communities.

Community tensions within some areas have impacted on children and their feelings of safety within communities. There is a need for Welsh Government to invest in and promote community cohesion, recognising the importance of children accessing their right to information and having a safe space within education settings to share their experiences, worries and concerns. As recommended within my spotlight report into racism in schools in Wales, published in November 2023, there is a need for further training and professional learning resources to support school staff to share information and have these conversations with children across Wales, seeking to increase understanding and relieve tensions within communities. This recommendation has been accepted by Welsh Government in their response to the report in July 2024.

Further to this and in addition to the work of the Anti-Racist Wales Action Plan, I feel it is necessary for Welsh Government to respond to growing community tensions and recognise the need to build and strengthen cohesive communities across Wales.


Summarised UN Concluding Observations related to this work:

20. (a) to implement targeted policies and programmes to combat racist and xenophobic activities and to eliminate discrimination against children in disadvantaged situations, including children belonging to ethnic minority groups, asylum-seeking, refugee and migrant children.

Recommendations

- Welsh Government should review their Community Cohesion Strategy, specifically exploring misconceptions around sanctuary seekers and Islamophobia, and ensure that children and young people's voices are considered as part of this process.
- In response to our Racism in Secondary Schools report, Welsh Government should expedite and complete no later than

Summer 2025 its planned work to explore the mechanisms needed to collate data and produce a consistent reporting format of racist incidents and harassment in schools and colleges. This was already committed to within the ARWAP (Anti-racist Wales Action Plan) to be done by Sept 2023, and was a key recommendation emerging from our own 'Take it Seriously' report into racism in secondary schools.



ADEQUATE STANDARD OF LIVING

ADEQUATE STANDARD OF LIVING

Gypsy, Roma and Traveller - Equality

The inequalities experienced by Gypsy, Roma and Traveller communities are recognised in the Anti-racist Wales Action Plan however there are number of actions outlined within this plan that have been slow to progress.

It is essential that Welsh Government address these actions as a matter of priority to prevent the exacerbation of these inequalities and to assure communities that these issues are being taken seriously in the endeavours to become an anti-racist nation.

Summarised UN Concluding Observations related to this work:

20. (a) To implement targeted policies and programmes to combat racist and xenophobic activities and to eliminate discrimination against children in disadvantaged situations, including Roma, gypsy and traveller children.

Recommendations

- Utilise a community forum as a means to communicate updates on actions and progress from Anti-Racist Wales Action Plan, working with key stakeholder organisations to regularly communicate with community members, including children and young people.

ADEQUATE STANDARD OF LIVING

Gypsy, Roma and Traveller - Education

We have continued to raise concerns with Welsh Government regarding the impact of the new Relationships and Sexuality Education (RSE) curriculum on some families and welcome the on-going development of guidance to support professionals in this area.

In their report on attendance, Estyn highlighted that the attendance of two ethnic groups, Gypsies and Travellers, has deteriorated considerably post-covid. The report states:

“The attendance of Gypsy pupils decreased by 12.4 percentage points to 70.6% and that of Traveller pupils decreased by 21.9 percentage points to 63.3% (Welsh Government, 2023a).”

We are actively engaged in the Welsh Government National Taskforce on attendance, and hope engagement work will reflect the need to consider this issue through an equalities lens. However, given the educational barriers and inequalities already experienced by children and young people from these communities, we would recommend a focussed approach to understanding the barriers to education for Gypsies and Travellers post-covid.

Further to this, [SHRN data](#) published in April 2023 highlighted the experiences of Gypsy and Traveller learners in schools, with only 37% Gypsy and Traveller young people agreeing that their teachers care about them as a person and 52% feeling like their teachers accept them. In both examples, this was the lowest percentage for all ethnic groups. This highlights the need for specific action around training and learning for education staff which I have outlined in the recommendations set out in my spotlight report, [“Take it seriously”: children’s experiences of racism within secondary schools](#).

We know from the latest Government published data that there has been an upward trend in children receiving their education other than at school (EOTAS). The rate per 1,000 pupils is currently 4.9, which is the highest rate since the data began to be collected, in 2009/10, having doubled proportionately since then. Children’s experiences of school within this changing and challenging context need to be looked at and listened too; including those from Gypsy and Traveller backgrounds, and other protected groups.

Summarised UN Concluding Observations related to this work:

34. (b) Strengthen measures to protect children from intimidation, racist attacks and other forms of violence.

Recommendations

- Develop a focus group, as part of the Attendance Taskforce or otherwise, to further understand the barriers to education for Gypsies and Travellers post-covid.
- Welsh Government must expedite their plans for youth engagement more generally, as part of the Attendance Taskforce work.

ADEQUATE STANDARD OF LIVING

Mental health

Mental health and wellbeing is one of the biggest issues raised by children and young people themselves.

In our autumn 2022 survey, 44.6% of young people aged 12-18 selected ‘more mental health support’ as a priority for the Commissioner. When asked for suggestions for what would make children and young people’s lives better, young people most frequently raised suggestions related to mental health and wellbeing. Recommendations from young people included:

“Listen to them, [give them] mental health breaks, time for them to sit and talk to someone instead of them being bottled up...”

“youth mental health should be taken more seriously and potentially have yearly or monthly checks”,

“free therapy to have to go to similar to a check-up whether they ask for it or not”.

Between December 2023 and April 2024, the Commissioner met with every Health Board in Wales to discuss their mental health and wellbeing offer for children and young people. While there were some promising examples of good practice, including the roll out of new ‘sanctuary models’ for mental health crisis care, it was clear from those meetings that far too many children are waiting too long to receive treatment, or do not have access to the right support to suit their needs.

Children and young people wait longer than adults for mental health support. The figures for March 2024 show that 56.2% of under 18s started a therapeutic intervention within 28 days of assessment, compared to 82.1% of adults^[1].

Health Boards have told us that while improvements have been made to getting children seen for an initial assessment, intervention under part 1 of the Mental Health Measure (LPMHSS) continues to be a serious challenge.

In Spring 2024, Welsh Government published a draft mental health and wellbeing strategy. It is an all-age strategy. While there is some welcome narrative in the strategy relevant to children and young people, we believe that there needs to be a Children and Young People’s delivery plan which focuses on their needs given the poor experiences of many children in trying to access mental health support. While an all-age approach will, we hope, mean that the difficulties experienced by young people transitioning to adult services could be lessened, we must not lose any focus on the needs of children and young people, and that is why we feel a specific action plan is necessary.

Summarised UN Concluding Observations related to this work:

- 42. (c) Develop or strengthen strategies, with sufficient resources, to ensure community-based therapeutic mental health services and programmes for children of all ages.
- 42. (d) Urgently address the long waiting times for accessing mental health services and the associated stigma, and ensure sufficient workforce to meet children’s needs in a timely manner and close to where they live;

[1] Part 1: Local Primary Mental Health Support Services (gov.wales)

Recommendations

- The Welsh Government should within the 2024/25 financial year publish a delivery plan for children and young people’s mental health and wellbeing.

ADEQUATE STANDARD OF LIVING

Healthy Child Wales programme

In 2022, over 62,000 contacts from health visitors that should have taken place did not^[2]. We have raised concerns over health visiting, in particular, with the Cabinet Secretary, and with the Chief Nursing Officer, in follow up to recommendations made in last year’s annual report.

We urge Welsh Government to focus on the Healthy Child Wales Programme to ensure it is delivering as best as it possibly can. Part of this may be improved with digitalisation of health visiting paperwork, which I understand is currently being worked on by Digital Health Care Wales.

We have concerns that this universal service is being impacted by the NHS recruitment and retention crisis, and Health Boards are changing their models of provision to respond to those very real pressures. While Health Boards are taking innovative approaches to tackling these issues, we urge a full review which sets out what the future of the Healthy Child Wales Programme looks like, and what expectations of Health Boards should be.

Summarised UN Concluding Observations related to this work:

- 41. (a) Strengthen measures to ensure the availability of quality, child-sensitive and age-appropriate paediatric primary and specialist health-care services to all children.
- 41. (b) Develop a strategy to address health inequalities including children in disadvantaged situations.
- 46. (d) Ensure that measures to combat poverty comply with a child rights-based approach and include a particular focus on children in disadvantaged situations, especially children of single parents.

Recommendations

- Welsh Government should review the effectiveness of the Healthy Child Wales Programme within the current Senedd Term. The review should set out clear expectations on frequency/ number of contacts; and what any alternative provision and support offer looks like; as well as digitalisation of health visitor records to improve efficiency.

[2] www.rcpch.ac.uk/sites/default/files/2024-05/letter_to_first_minister_welsh_royal_colleges_child_health_collaborative_1.pdf

ADEQUATE STANDARD OF LIVING

Vaping

We are very concerned by the increased use of e-cigarettes/‘vapes’ amongst children and young people. Due to their nicotine content and the potential long-term harms to health, vaping carries a risk of harm and addiction for children and young people. There is also evidence that it is impacting children and young people’s education and wellbeing.

In their [survey of 12,524 secondary school children in Autumn 2023](#), Action on Smoking and Health (ASH) Cymru found that 24% had tried vaping, and 7% report being regular vapers. We were pleased that the UK Government announced they would legislate to protect children from the harms of vaping. The new UK Government has re-committed to taking this Bill forward. It will create powers to regulate the flavours and contents of vapes; retail packaging and product requirements; and point of sale displays. It also would have extended the existing offence to sell vaping product to under 18s; and for it to apply to non-nicotine vapes as they are a gateway to nicotine. However, the timescales for progressing the bill aren’t known at the time of writing.

Public Health Wales set up an Incident Response Group, to investigate the rise in vaping among children and young people, to which we were observer members during the year. The Group published a report in April 2024. Some of the [Incident Response Group’s recommendations](#) to Welsh and UK Governments are that:

- **There should be support for young people who are nicotine dependent due to vapes.** Young people who have a particular need in relation to their dependency should be given access to nicotine replacement therapies (NRT). Replacement therapies are already available for anyone over 12 who is smoking. NRTs may include chewing gum, skin patches, or inhalators.
- **Vapes should not be visible at point of sale** and vape devices and consumables should only be available in plain, unbranded, standardised packaging.
- **Flavour names should be legally restricted** to a specified list of basic descriptors.
- **Flavours should be restricted** to tobacco, mint, menthol and fruit.
- **The sale and supply of disposable (single use) devices should be banned.**

In April 2024, we conducted a small focus group with young people and the adults supporting them to understand their views on vaping. Information from this session reflected our ongoing concerns regarding the attractiveness and accessibility of vapes, the lack of availability of nicotine replacement therapy for vapers, and the lack of available educational information to help combat use.

Public Health Wales has produced welcome guidance for schools, published in September 2023^[3]. The guidance provides key messages to support staff and sets out how schools can respond to the issue of vaping through 10 ‘key actions’. This includes reviewing policies, engaging with the wider school community, supporting children and young people who wish to quit vaping, and advice on how to link tackling vaping to the new curriculum.

Summarised UN Concluding Observations related to this work:

- 44 (c) *Strengthen measures to provide adolescents with information on preventing substance abuse, and ensure early identification and adequate referral of adolescents requiring treatment.*

Recommendations

- Welsh Government must do all it can to ensure that UK-wide legislation progresses to protect children, and that it takes all possible actions here in Wales to restrict access to these harmful products.
- Welsh government must support PHW to roll out and increase awareness of the new guidance for schools during the academic year 2024/5, using all available platforms including Hwb, Dysg.
- In line with Public Health Wales’ Incident Response Group’s Recommendations, Welsh Government should ensure that access to interventions, such as Nicotine Replacement Therapy, is consistently available across Wales and children/ support services are aware of how they can access this support.

[3] phw.nhs.wales/topics/information-and-guidance-on-vaping-for-secondary-aged-learners-in-wales/information-and-guidance-on-vaping-for-secondary-aged-learners-in-wales/

ADEQUATE STANDARD OF LIVING

Public transport

In my annual report last year, I recommended that the Welsh Government introduce a pilot scheme for free public transport for children and young people, as a tackling poverty measure as well as a key action in respect of the climate emergency. Their response indicated that the Government were “unable to progress this at this time”, but would be keen to do so “when the overall picture of public finances improves”.

Throughout our visits across Wales, transport costs and availability has continued to arise as a key concern and barrier to children accessing their rights. In our February ‘Monthly Matters’ consultation on young people’s priorities for a new First Minister, transport was a hot topic. We heard calls for better and cheaper public transport as well as a range of views around the 20mph limits.

The Commissioner engaged with the Petitions Committee work on this topic via a closed evidence session in February 2024, to again implore consideration of this important issue affecting children across Wales. Their work also included consideration of the petition from members of the office’s young people’s advisory panel, based on their work with the European Network of Young Advisors (ENYA) in 2022. The Committee report Freedom to thrive: Free and accessible public transport for young people, published in May 2024 made a series of recommendations that I would wholly endorse, recognising the need to set out a clear ambition to provide free public transport for young people at the earliest opportunity, with the preparatory work being undertaken with a view to introducing a nationwide scheme in the future.

Summarised UN Concluding Observations related to this work:

- 45. (a) Reduce greenhouse gas emissions in line with national and international commitments;
- 45. (c) Ensure that national policies and programmes to address environmental protection and climate change are developed and implemented in accordance with the principles of the Convention and take into account children’s needs and views;
- 46. (a) Develop or strengthen existing policies, with clear targets, measurable indicators and robust monitoring and accountability mechanisms, to end child poverty and ensure that all children have an adequate standard of living.
- 46. (d) Ensure that measures to combat poverty comply with a child rights-based approach.

Recommendations

- The Welsh Government must commit to actioning the recommendations of the Petitions Committee report Freedom to Thrive, to include a commitment to free public transport for children and young people and undertaking the preparatory work around costings, options appraisals and consultation with young people. This work should happen within this Senedd term to ensure the next Government has the information available to them, to make political choices accordingly.

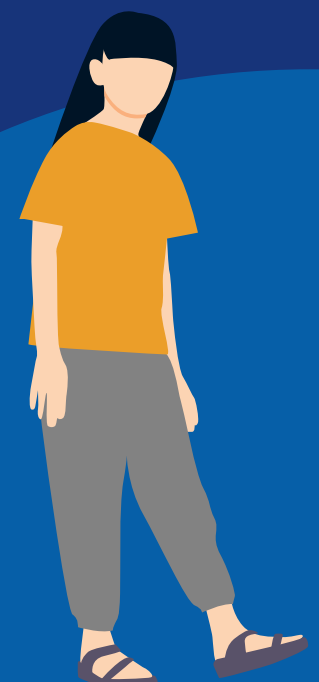
We’re a proud anti-racist organisation, a Living Wage employer and a Disability Confident employer.



08

OUR COMMITMENTS

There are certain national standards and duties that we must follow as a public body, including the Welsh Language Standards and the Equality Act.



Welsh Language Standards

Our aspiration is clear: we want the Welsh language to be a living, breathing language in our organisation. We actively promote the language and the principles of the Welsh Language (Wales) Measure 2011 and have measures to ensure we comply with these Standards.

This year saw us publish our ‘Welsh in our Workplace’, which describes how in practical terms we ensure the Welsh language is a living, breathing language; how we plan for Welsh language skills in the workplace; how we treat staff with respect in relation to their language choice; how we implement Welsh language skills requirements in the workplace; how we develop Welsh language skills in the workplace and how we deliver our service in Welsh and English. You can read this document on our website.



As at 31 March 2024, there were **23** people working for the Commissioner. Of those staff members:

- 9** described themselves as proficient in Welsh
- 2** described themselves as having intermediate level skills in Welsh
- 3** describe themselves as having advanced skills in Welsh
- 9** describe themselves as unable to speak Welsh/entry level Welsh

We received no complaints in relation to the Welsh language during 2023/24.



Equality Duties

The Commissioner is a listed authority under the Equality Act (Statutory Duties) (Wales) Regulations 2011. This means that the office must follow what are called ‘general duties’ to promote equality.

As a national human rights institution, equality is at the heart of the Commissioner’s vision and mission. This year saw us review and refine our strategic equality objectives and delivery plan, aligning those objectives to our wider strategic priorities. It’s based directly on the participation of children and young people in our large-scale consultation, Ambitions for Wales.

You can read our updated strategic equality objectives and delivery plan on our website here: childcomwales.org.uk/about-us/our-work-on-equality/



09 OUR DIVERSITY

Workforce Equality, Diversity and Inclusion Profile for the financial year 1st April 2023 to 31st March 2024.



1 Introduction and context

We gather information about diversity from our Team and the Commissioner's Audit and Advisory Panel members in relation to all of the protected characteristics covered by the Equality Act each year.

These important statistics help us to identify positive actions to improve the inclusive nature of our workplace. This is a voluntary request and approximately 15% of participants choose the 'prefer not to disclose' option for each equality characteristic so we do not have a complete picture and we caveat this section on that basis.

Whilst we recognise the importance of sharing our diversity statistics, we are a small team (just 23 people on 31 March 2024), so there are limitations on the level of detail we can share to respect the data protection rights of our colleagues.

For ease of reporting and comparing between years, we report our statistics on a fixed date in the year (31 March 2024). As a result, we must also accept that this method will not capture the diversity profile of all short-term employees or placement students we have supported in this time who will undoubtedly bring a wealth of perspectives and experiences to our Team.

Despite these limitations the data provides us with reasons to celebrate and an indication of what is helping us on our journey towards building a more inclusive workplace.

2 Reasons to celebrate

Despite the limitations in the data as indicated above, there are things to celebrate this year from an equality perspective about the make-up of our small Team:

- We are proud of our gender equality in terms of empowering women in the workplace. We have a female Children's Commissioner and a management team that includes 5/6 female leaders. This year has seen a significant shift in our gender pay differentials (see section 4);
- We are proud of our Welsh language culture. We have a high percentage of colleagues from a Welsh ethnicity and 61% of our staff team have advanced and proficient skills in the language;
- We are also making strides to improve the diversity of our Team with some important (and previously missing) perspectives from minority ethnicities in Wales including the Chinese community and beliefs including Buddhism.
- We are proud of our efforts to support people with long-term health conditions in the workplace and have been learning from colleagues and Audit and Advisory team members who understand disability by association. Some of the support initiatives offered for our staff includes our flexible working approach, remote working abilities, leave to attend medical appointments, external services such as Access to work and Occupational Health, purchasing of specific office equipment and DSE assessments. We support young people with disabilities to participate in recruitment processes and our Advisory Panel meetings and activities, learning all the time from their relatives and the young people themselves about the best way to enable their full participation.
We have also started our journey this year to becoming a trauma informed organisation and we have continued learning from our membership of the Disability Confident Scheme.

- We employ people from across the age ranges with our youngest Team member being in their 20s and the oldest over 60 years of age.
- As a very small team of people, the diverse lived experiences of members of our Adult Advisory panel and Children and Young People Advisory Panel also make a vital contribution to the breadth of our world views.

We are cautiously optimistic that the changes to our recruitment processes will continue to increase the diversity of our Team; nevertheless, we are not complacent about our workforce equality. We know the diversity of our Team can change with just one resignation and there remains some important lived experiences absent in our current staff make-up.

However, our Advisory Panel members fulfil a vital role in bringing missing voices to our work. Our current panel includes people with LGBTQ+ lived experiences, disability and minority ethnic backgrounds and different religions.

During the past year, we have continued to refine the changes we introduced the previous year to our recruitment processes in relation to equality. We have seen an increased number of applicants living with disabilities, applicants requesting a guaranteed interview, increased number of video applications, increase in applicants from ethnically diverse backgrounds and the LGBTQ+ community.

Our learning and development activities this year included refresher training on Equality Impact assessments and learning more about the inequality experienced by people and families living in poverty. Some of our Team received training in Makaton, a language programme that uses symbols, signs and speech to enable people to communicate.

3 Overall workforce diversity

On the 31st of March 2024, we had twenty-three people on the payroll (including the Children's Commissioner).

Between 1 April 2023 and 31 March 2024, five people left the Team. This included two people on fixed term contracts and three people on full-time permanent contracts moving on for promotion opportunities.

In this period there were two new appointments, both were employed on permanent full-time contracts.

On 31st March 2024:

- **4%** of our workforce (1 person) was engaged on a fixed term basis directly related to maternity cover.
- **56.5%** of colleagues (13 out of 23 people) worked full time hours and 43.5% worked part time hours. This compares to the year before where 35% worked part time. 8.5% of our part time workers are male (2 out of 10 people). This is a slight increase on the number reported last year.
- **82%** of our workforce identify as female; this is the same as last year. Similarly, the majority of our Audit and Advisory Panel members are female.
- The majority of the staff team disclosed a heterosexual orientation or preferred not to disclose their sexual orientation. A small percentage of our Audit and Advisory Panel members disclosed a gay orientation.
- No one in the Team disclosed transgender, bi gender or gender fluid identities in this period.
- **39%** (9 people) of our colleagues in this period are under 35 years old; this is slightly less than last year where 53% of our workforce was under 35 years of age. 44% (4 out of 9 people) of this age group works part time.
- **39%** (9 people) of our colleagues in this period are between 36 and 54 years of age. 33% (3 out of 9 people) of this age group works part time. The majority of our Adult Audit and Advisory Panel is in this age range.
- **22%** (5 people) of our colleagues are aged 55 years and over, last year this figure was 14%; 60% of this age group works part time.
- We do not currently employ anyone over age 65.
- **15%** of our workforce live with a long-term health condition/disability; compared to 22.5% of the Welsh workforce as a whole.
- **87%** of our workforce on 31st March 2024 declared they were from a white ethnicity compared to 88% on 31st March 2023; with 61% describing themselves as White Welsh. Other ethnicities in our current Team include Latin American and Chinese.
- **61%** of employees (14 out of 23 people) describe their Welsh language skills as either proficient, advanced or intermediate level. 39% of our workforce declared they have entry-level or foundation skills in the language. This is a slight increase in the number of colleagues with proficient Welsh language skills from the previous year.
- **48%** of our workforce declared their commitment to a specific religion (Christianity, Buddhism and one other included). 35% of colleagues declared they have no religion or belief, whilst 17% prefer not to disclose. Our Adult Advisory panel includes people from Sikh and Muslim religions.
- During this financial year, we have supported four people through pregnancy and maternity leave and one person with paternity leave.
- Representatives from all genders, most grades and contract type accessed learning and development opportunities this year. In addition to individual learning applications, our whole team development programme continues and enables part-time workers, temporary workers and workers with protected characteristics to have equal access to learning and development opportunities.





4 Gender and Pay differentials

The Job Evaluation and Grading System that underpins the pay system in CCfW allocates a banding to individual posts based on seven different work factors: autonomy, problem solving, decision-making, impact, management of resources, contacts and communication, knowledge and skills. This system ensures that differences in salaries for posts relate to specific job requirements and contributes to our commitment to eradicate bias in the recruitment process.

Of the 19 female staff in post on 31 March 2024, 5 employees, or 26% of the female workforce, were employed in the three highest pay bands; compared to 1 male employee, or rather 25% of the male workforce. The differential between the two is less this year (1%) compared to last year (21%).

A smaller number of male employees occupied a disproportionate number of senior roles in the workforce for many years, however, this year reveals a more equal spread of senior roles amongst the two genders. The gender balance of the Management Team itself is now weighted heavily toward female members of staff with 5 female participants and 1 male participant.

Female staff continue to be the larger part of our workforce, and a female occupies the most senior position in the organization. The average full time equivalent salary for a female worker on 31 March 2024 has risen to approximately £43k from 35K last year and the average salary for a male worker has risen to approximately £45k from £41k last year. The differential between the two genders has decreased by 2k.

Only female staff members occupy the two lowest pay bands in CCfW and 8 of the 10 part-time workers in CCfW are female. Whilst this contributes to the average salary differential, in this financial year we recruited a new management team member who is female and increased the number of females on the three highest pay bands.

Of the 19 female staff members employed on 31 March 2024, 42% (8 people) occupy part time roles. 50% of the male workforce works part time. This is the first year we have reported a higher percentage of the male workforce working part time.

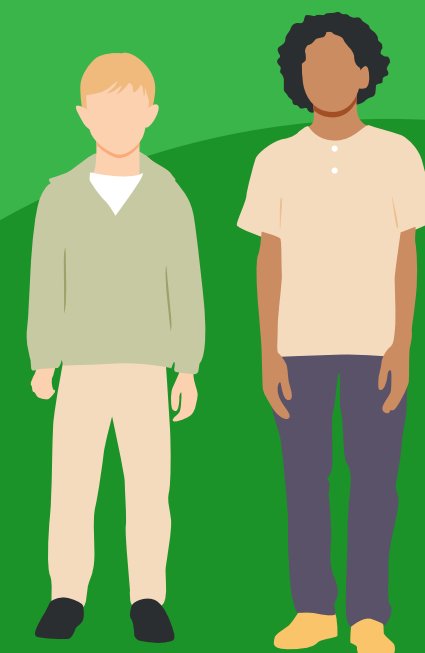
This year has seen an interesting shift in the gender and pay differentials in CCfW.

10 SUMMARY FINANCIAL INFORMATION FOR 2023-24

The following is a summary of the financial information contained in our Annual Accounts for 2023-24. A full set of financial statements can be found on our website – www.childcomwales.org.uk

The accounts were subject to external audit; the Auditor General for Wales provided an unqualified opinion on these accounts.

Although independent of Government, the Commissioner's only source of income is from the Welsh Government. We received **£1.720 million** (2022-23: £1.640 million) to fund our organisation and all its activities for 2023/24.



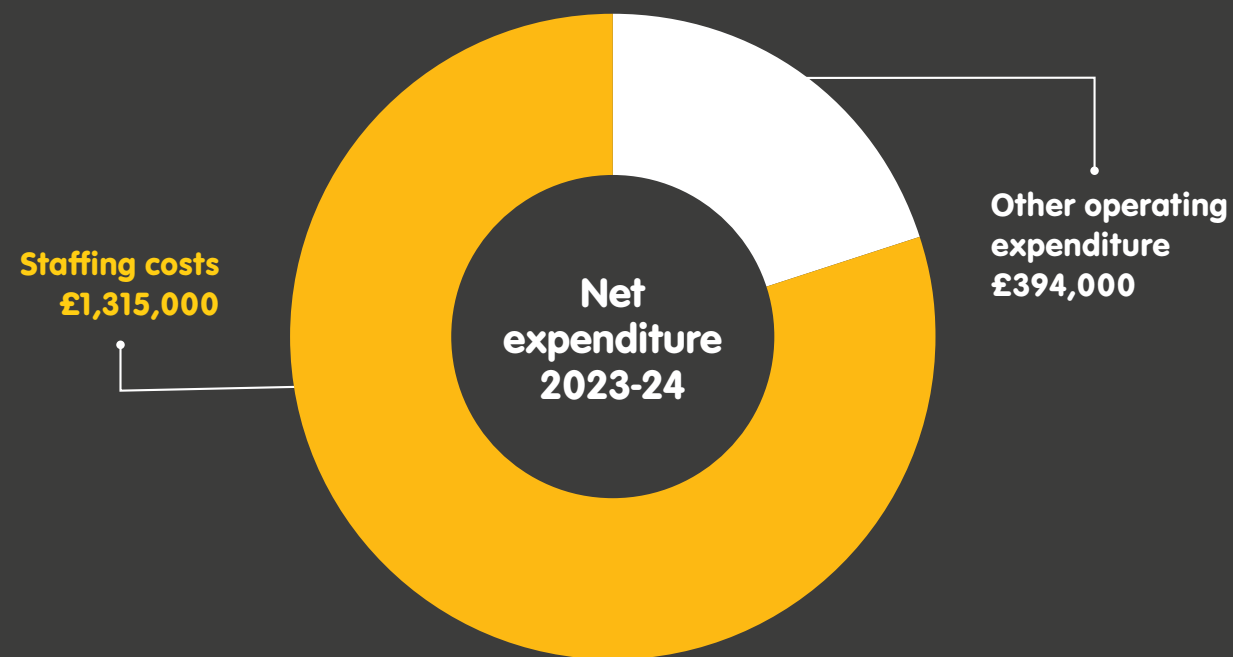


Our spend in 2023-24

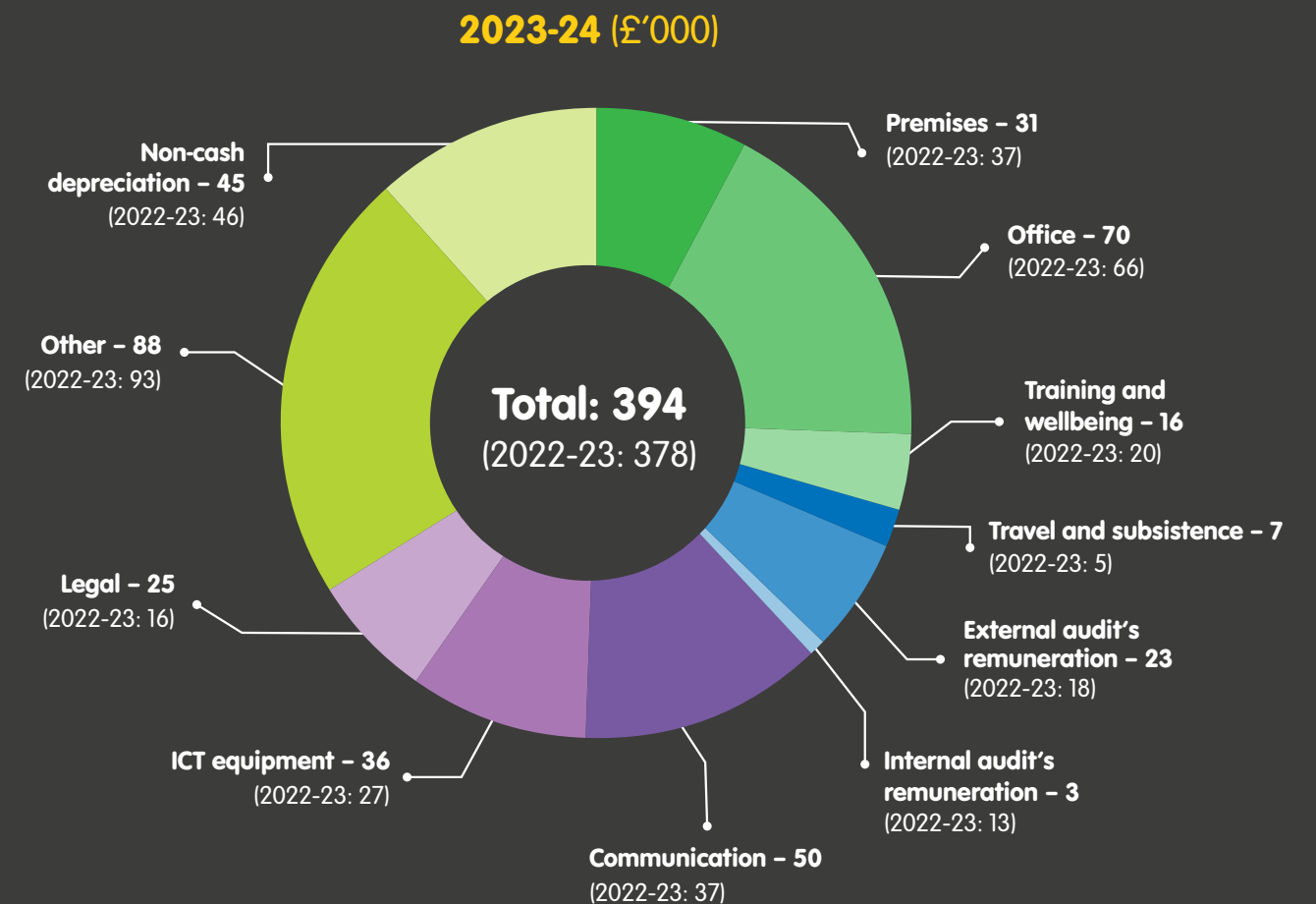


The chart below illustrates our net expenditure in 2023-24.

The organisation reduced its staff costs this year and increased other operating expenditure, delivering on our ambitions for children and young people (staff costs for 2022-23 totalled £1.343m and operating expenditure for 2022-23 totalled £378,000).



The chart below illustrates the costs of operating activities by category of expenditure. It also includes details of non-cash depreciation.



11 BEYOND 2023-24

Our three-year strategy includes details of all our ambitions for children and young people. We develop annual operational plans to help deliver our ambitions and we make sure we retain capacity to respond to emerging issues every year.

As well as continuing to focus our efforts on our four priority areas of poverty, education and additional learning needs, mental health, and equalities, we plan on working on the following themes in 2024/25:

- * What it's like to be a disabled child in Wales?
- * Where do children live in Wales? (Housing and homelessness)
- * Sustain the roll-out of our 'Right Way' resources and support many more public bodies to implement a children's rights approach
- * School complaints system
- * UK Covid-19 Inquiry work relating to children and young people
- * Protecting and promoting the rights of children in alternative care with ENYA, the European Network of Young Advisors
- * Scoping a model complaints procedure for children with the Public Services Ombudsman for Wales

You can keep in touch with all our work via our monthly newsletters, quarterly impact reports and on our website, under 'Our Work'.



**Comisiynydd
Plant Cymru**
Children's
Commissioner
for Wales



Children's Rights Advice & Assistance Team

All children in Wales have rights under the United Nations Convention on the Rights of the Child (UNCRC).



This includes the right to education, the right to the best possible health care, and the right to be safe.

If you need help accessing your rights, contact us.
Freephone: **0808 801 1000**

Click [here](#) to download a copy of the 'Children's Rights Advice and Assistance Team' leaflet .

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for **Wales**