



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

Independent evaluation

The Children's Commissioner for Wales three-year strategy: Making life better for Children in Wales (2023–2026)

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Executive Summary

This report reviews and evaluates the scope, progress, and impact of the Children's Commissioner for Wales (CCfW) and her team's work between April 2023 and July 2025, in relation to the priorities highlighted by the Ambitions for Wales survey and framed by the Commissioner's strategic commitments.

These commitments, being Here for All Children, a Rights Realiser, a Truth Teller, and a Challenger, have guided the Commissioner's actions in awareness-raising, casework, influence, and partnership-building across Wales. The review draws on extensive evidence, participatory reflection with the Commissioner's office, and contextual mapping to assess how children and young people's voices have been amplified, their rights advanced, and systemic change nurtured.

The CCfW has set a clear vision: a Wales where every child understands their rights, knows the Commissioner is there to uphold them, and can access support to realise those rights. Guided by four strategic commitments - being Here for All Children, a Rights Realiser, a Truth Teller, and a Challenger - the Commissioner's office works to listen, amplify voices, educate, influence, and hold public services accountable. These commitments, alongside implementation mechanisms and priorities identified through the national Ambitions for Wales survey, frame action on key issues including equalities, education and additional learning needs (ALN), child poverty, and mental health. By integrating children and young people's perspectives into policy, awareness-raising, and practice, the Commissioner ensures that their work translates strategic goals into tangible outcomes that improve their wellbeing across Wales.

Under the foundational commitment, Here for All Children, the CCfW has strengthened mechanisms to listen to and represent children across Wales. By maintaining partnerships with over 150 organisations/groups, enhancing data collection and analysis through initiatives like Monthly Matters, and prioritising engagement with underrepresented groups, the Commissioner has amplified children and young people's voices and informed policy and practice. Targeted collaboration and youth participation structures, including MOUs with Senedd Ieuenctid and strengthened advisory panels, have ensured accountability to children.

As a Rights Realiser, the CCfW has strengthened children and young people and stakeholder awareness of their children's rights, while supporting public services to embed these rights into policy and practice. Initiatives such as school engagement on the new Curriculum for Wales duty, the refinement and promotion of The Right Way framework, and the development of a model complaints policy have enhanced practitioner capacity and laid the foundations for systemic change.

As a Truth Teller, the CCfW has empowered children and young people to share their lived experiences, ensuring that these voices shape policy, practice, and public awareness across Wales. Initiatives such as the No Wrong Door model, casework around ALN and other issues, and targeted engagement on mental health, child poverty, and inclusion have amplified both systemic and individual issues. The Commissioner's awareness-raising has contributed to improved outcomes for children and young people now and into the future, transforming lived experiences into meaningful change.

As a Challenger, the CCfW has consistently called out gaps, shortcomings, and inequities affecting children and young people, driving change across policy, practice, and public awareness. From advocating for free public transport to reduce child poverty and address the climate emergency, to challenging the adequacy of mental health provision, safeguarding processes, housing, and care services, the Commissioner has ensured that children's voices influence government decisions. This work addresses systemic issues, strengthens the effectiveness and responsiveness of services, and helps create conditions for meaningful, lasting improvements in the lives of children and young people.

The Ambitions for Wales consultation was designed to inform and underpin the CCfW's strategic framework: Making Life Better for Children in Wales (2023–2026), and has provided the most comprehensive picture to date of what matters to children and young people in Wales. More than 8,000 participants, including parents, carers, and professionals, shared their experiences, concerns, and priorities around children and young people's wellbeing and rights. Their messages were clear: children want adults to listen, care, and act. Participants called for fair access to mental health support, support to recover from the COVID-19 pandemic, safe and inclusive schools, action on child poverty, equality for children with ALN, appropriate accommodation for children and families, and opportunities to take part in decisions about their communities and futures.

These findings underpin the development of the Making Life Better for Children in Wales (2023–2026) framework, which has been designed to systematically and comprehensively address the issues, concerns, and priorities identified through the Ambitions for Wales consultation. Since 2023, the Commissioner has drawn on evidence from Ambitions for Wales to inform and guide her work in challenging the Welsh Government and public bodies on a range of issues, including the pace and ambition of the Child Poverty Strategy, the consistency of mental health support, and early intervention.

However, the Ambitions for Wales findings underline the continuing need to close the gap between what children say and the action they see. Many children and young people from lower-income families, children with disabilities, and those from minority ethnic or LGBTQ+ backgrounds expressed less confidence that decision-makers understand or represent their experiences. Further work remains for the Commissioner to continue using the office's powers and influence to challenge public bodies to address these inequalities and ensure that every child and young person's voice carries weight in decisions that affect their lives.

The Commissioner's office has made substantial strides over the past strategic period, significantly enhancing children's rights and wellbeing across Wales. Through strategic awareness-raising, robust engagement with children and young people, and close collaboration with public services and sector partners, the CCfW has strengthened systems, amplified children's voices, and delivered tangible improvements in policy, practice, and everyday experiences. These achievements have laid a strong foundation for continued progress and deeper systemic change.

Alongside these successes, there remain areas where approaches could be further strengthened to maximise impact and ensure that every child benefits fully. While the CCfW gathers a rich range of evidence from children and young people, this information is currently dispersed across multiple internal systems. Bringing data together more systematically would enhance the ability to monitor outcomes consistently, identify inequities, and fully leverage insights to inform policy and advocacy. Similarly, engagement with underrepresented children could be expanded and made more systematic, ensuring that all voices, particularly those facing multiple barriers, shape decisions and service delivery across all thematic areas. Variation in local provision of services, including school transport, mental health support, and ALN, continues to create postcode inequalities. Strengthening monitoring and accountability, and ensuring consistent standards across local authorities, remains essential to guarantee that all children can access their rights. There is also scope to improve monitoring and reporting on the impact of recommendations, initiatives, and legislative guidance, providing a clearer picture of systemic improvements over time.

Addressing these opportunities will build on the Commissioner's strong foundations, enhancing the reach, influence, and effectiveness of the office. By continuing to integrate evidence, strengthen engagement, and champion equitable access to services, the CCfW is well-positioned to drive lasting, meaningful change; ensuring that every child in Wales experiences stronger protections, equitable opportunities, and meaningful participation in decisions that affect their lives.

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Acronyms

AfW	Ambitions for Wales
ALN	Additional Learning Needs
CAMHS	Community child and adolescent mental health services
CCfW	Children’s Commissioner for Wales
CPR	Child Practice Review
CRIA	Children’s Rights Impact Assessment
EOTAS	Education Otherwise Than at School
ESTYN	Education and training inspectorate for Wales
HIW	Healthcare Inspectorate Wales.
MOU	Memorandum of Understanding
MS	Member of the Senedd
NAEL	National Academy for Educational Leadership
RSE	Relationships and Sexuality Education
SUSR	Single Unified Safeguarding Review
UNCRC	The United Nations Convention on the Rights of the Child
AfW	Ambitions for Wales



01

INTRODUCTION

This report reviews and evaluates the scope, progress, and impact of the Children's Commissioner for Wales (CCfW) and her team's work between April 2023 and July 2025, in relation to the priorities illuminated by the Ambitions for Wales (AfW) survey findings and set out in the Commissioner's strategic goals.

This report assesses where, how, and through which mechanisms the voices of children and young people are being amplified and their rights advanced, situates these findings within the wider national context, and identifies persistent gaps and challenges. The overall aim is to inform and strengthen the Commissioner's awareness-raising, influence, casework, and collaborative actions to secure the full realisation of children's rights across Wales.

The report is informed by a comprehensive and systematic review and thematic analysis of both internal and public-facing CCfW documents and data, participatory reflection exercises facilitated with the Commissioner and her team, and mapping and assessment of the wider context and ecosystem. The report is informed and supported by a structured matrix (Annex 1) populated with data from the Commissioner's work since April 2023 and set against wider national and regional activity.

This report is organised around the Commissioner's four strategic commitments – being Here for All Children, a Rights Realiser, a Truth Teller, and a Challenger – as defined in Making Life Better for Children in Wales: Our three-year strategy 2023-2026. Structured by these strategic commitments, overviews of findings are presented for each Implementation Mechanism, supported by detailed case studies and explanatory graphics for each commitment. Evidence of outcomes emerging from the Commissioner's work since April 2023 is presented and contextualised to provide a systematic analysis of progress, challenges, and opportunities.



02

VISION AND MISSION

The CCfW has set out a clear vision: *“A Wales where every child and young person understands their rights, knows the Children’s Commissioner is there to stand up for those rights, and is able to access support for those rights to be realised.”*

Their mission is *“to listen to and speak up for children and young people in Wales so that children’s rights are protected, and to support, challenge and influence public services to make a positive impact on their lives.”*

CCfW has defined four commitments in support of the organisational vision and mission:

1	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.
2	A rights realiser	We support and educate children and young people to know about and understand their human rights and we support and advise public services on promoting and protecting children’s rights.
3	A 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 and amplify unheard stories.
4	A challenger	We will challenge and support others to ensure children’s human rights are realised... we won’t be afraid of calling out poor services, poor decision-making and poor choices if they negatively affect children’s lives.

Under each commitment, interconnected implementation mechanisms have been defined to support its achievement.





1 Here for all children

Forge suitable partnerships

Make the most of data

Plug the evidence and engagement gap

Review youth participation structures

Explore accountability



2 A rights 'realiser'

Work with schools on the curriculum for Wales

Review and refine 'The Right Way'

Explore a 'Child friendly Wales'

Create a model complaints policy



3 A truth teller

Support COVID-19 recovery

Pursue 'No Wrong Door' model

Convene annual Child Poverty Summit

Review ALN Act implementation

Review statutory guidance and bullying

Explore broader inequalities

Understand where children live

Tackle key service provision

Address inconsistent DBS checks



4 A challenger

Challenge child poverty progress

Call for free public transport

Call for reform in services for care leavers

Explore online child safety

Review child protection procedures

Highlight unregulated accommodation

Challenge mental health support provision

Challenge efforts to tackle climate emergency

Figure 1 Implementation Mechanisms across the Strategic Commitments

These commitments frame the Making Life Better for Children in Wales (2023–2026) strategy, and the associated implementation mechanisms provide the foundation for this report's assessment of scope, progress, and impact since April 2023.



AMBITIONS FOR WALES (AFW)

Alongside the four strategic commitments, the Commissioner's work is guided by the issues that matter most to children and young people, informed by their responses and testimony contributed to the large-scale AfW survey.

This national consultation identified four thematic priorities that are central to realising children's rights and improving their everyday lives:

- 1. Equalities:** Tackling discrimination, addressing barriers for marginalised groups, and ensuring every child in Wales has equal opportunities and fair treatment.
- 2. Education/Additional Learning Needs (ALN):** Making education inclusive and ensuring that every child can learn, thrive, and achieve.
- 3. Child Poverty:** Responding to the cost-of-living crisis, reducing hardship, and pushing for systemic action to prevent poverty from limiting children's lives and opportunities.
- 4. Mental Health:** Improving access to timely and appropriate services, reducing stigma, and ensuring children's wellbeing is prioritised in policy and practice.

CCfW has worked consistently to ensure that the priorities and challenges identified by children and young people through the AfW survey are not only reflected in its strategic commitments, but also translated into tangible action. The Commissioner's team has systematically and meaningfully responded to the issues raised by children and young people through this national consultation and continued to amplify their experiences and perspectives, raising awareness on their behalf with government, public services, and wider society, and catalysing outcomes that are improving the wellbeing of children and young people and their families across Wales. By integrating the priorities of children and young people across their work, the Commissioner's office demonstrates a clear commitment to empowering children in Wales to realise their rights, and ensuring that policy and practice reflect what matters most to young people.

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FINDINGS

4.1 Here for all children

4.1.1 Overview

The first foundational commitment aims to ensure that all children in Wales are listened to and represented effectively. Recognising the limitations of a small staff team, CCfW prioritises working in partnership with others across the ecosystem, particularly organisations and agencies that have established trusted relationships with children and young people across Wales. Through these partnerships, CCfW leverages the existing evidence base and amplifies the voices of children and young people, caregivers, and professionals working with children to identify and champion key issues affecting children and young people.



Forge suitable partnerships

Make the most of data

Plug the evidence and engagement gap

Review youth participation structures

Explore accountability

4.1.2 Key findings

Overall, CCfW has strengthened its ability to collaborate across the sector, use evidence strategically, engage underrepresented groups, enhance youth participation, and ensure accountability to children. These combined efforts have created a coherent and impactful approach to amplify children's voices and embed their rights at the centre of policy and practice in Wales.

Forging suitable partnerships to facilitate effective collaboration

Over the strategic period, CCfW has formed or maintained partnerships with over 150 organisations/ groups, including the *Children's Legal Centre Wales and Children in Wales*. These partnerships have enabled joint initiatives such as co-hosting events (including the national *Child Poverty Summit*), and producing joint manifesto publications in 2025. This collaborative approach has strengthened sectoral influence and amplified children's rights concerns, particularly around child poverty, ALN, and Mental Health.



Ensuring efficient and effective use of internal and external data

CCfW has significantly enhanced the collection, analysis, and use of data to inform awareness-raising and actions. Internal data sources, including *Ambitions for Wales*, *Monthly Matters*, and advice case records, have been used extensively in consultation responses to the Welsh Government, policy positions, and on the CCfW website and social media accounts. External data, such as the *Child Measurement Programme for Wales* and the *School Health Research Network* (SHRN) survey, have supported position papers on issues like obesity and vaping. The improved case management system has strengthened the organisation's capacity to support a huge volume of cases and has enabled better reporting on trends of cases. Evidence produced by CCfW has been cited by a range of stakeholders, including diverse Members of the Senedd, and informed government policy, including the *2025 Health and Social Care (Wales) Act*, restricting profit-making in children's care services.

Understanding the experiences of underrepresented children and young people

CCfW has prioritised engagement with underrepresented groups, including care-experienced children and Gypsy, Roma, and Traveller communities. Initiatives such as Community Cohesion Forums with the Welsh Government and targeted engagement activities have influenced training provision; for example, the *Association for Fostering, Kinship and Adoption Cymru* has introduced new courses for professionals and parents informed by CCfW's work.

Reviewing and enhancing youth participation structures

Work with *Children in Wales*, *Young Wales*, and *Senedd Ieuenctid* has clarified roles and strengthened youth participation mechanisms. A new Memorandum of Understanding (MOU) has been signed with the Senedd Ieuenctid, ensuring joint working and enhanced scrutiny of CCfW's activities by September 2025.

Enhancing accountability to children and young people

Between April 2023 and June 2025, CCfW engaged with over 40,000 children and young people through direct engagement and the *Monthly Matters* surveys. Initiatives such as the *Ambassadors Refresher Project*, launched in 2023, have strengthened community advisory structures by merging community ambassadors with *Youth Advisory Panels*. Collaboration with *Senedd Ieuenctid* has enhanced accountability mechanisms, ensuring that children's voices remain central to decision-making and that the Commissioner's work is responsive to their perspectives.

Under the 'Here for All Children' commitment, two key initiatives are presented as case studies to illustrate the impact of the organisation's approach. The first, ***Partnership on Child Poverty***, focuses on forging sustainable partnerships to enable collaborative working, resulting in a stronger, united sector voice that amplifies children's rights concerns around the priority issue of child poverty. The second, ***Amplifying Young People's Voices: How the Children's Commissioner for Wales is Shaping Policy Through Real-Time Insights***, highlights how strengthening internal systems for gathering, analysing, and using evidence, through the introduction of *Monthly Matters*, has informed more robust, data-driven awareness-raising that is also responsive to emerging issues.

4.1.3 Case study: **Child poverty: Partnership and policy influence**

The CCfW has consistently and effectively worked in partnership with others across the sector, collaborating with over 150 organisations during the past strategic period. The work on child poverty exemplifies this collaborative approach, partnering to amplify the voices of children and young people and strengthen the national response to child poverty.

Recognising the limitations of individual efforts and the need for collective action, the Commissioner collaborated with the Observatory on Children's Rights and Children in Wales to convene the first Child Poverty Summit in Wales in 2023. The Summit brought together young people, academics, practitioners, and policymakers, producing a joint report that defined shared priorities for change.

The Commissioner's office, the Observatory on Children's Rights, and Children in Wales all responded to the Welsh Government's draft Child Poverty Strategy, echoing calls from the Child Poverty Summit, and specifically calling for:

- UNCRC rights be made central (rather than simply "referenced" or aspirational);
- Measurable outcome targets, progress indicators, and a delivery/action plan;
- Greater accountability and clarity on how the strategy would be monitored.

The Equality and Social Justice Committee's report also mirrored concerns raised by the Commissioner and partners, lending weight to sector-wide critiques that gained significant press coverage with articles on major broadcasters including the BBC, Channel 4, ITV, and Radio Wales.

Whilst not all of the recommendations were realised in the Child Poverty Strategy for Wales, the impact of this joint advocacy manifested in multiple ways. Recommendations from the Child Poverty Summit report, including calls for Children's Rights Impact Assessments, embedding UNCRC principles and clear targets, were echoed in Senedd debates from Members of the Senedd across all four major parties, this included Jenny Rathbone MS, Welsh Labour; Sioned Williams MS, Plaid Cymru; Jane Dodds MS, Welsh Liberal Democrats; Gareth Davies MS, Welsh Conservatives.^[1]; and were partially reflected in the final strategy.

The network graph below visualises Members of the Senedd who mentioned the CCfW while discussing the issue of child poverty in Senedd debates or committees.



[1] Jenny Rathbone MS, Welsh Labour speaking at the Committee for the Scrutiny of the First Minister, 26th April 2024. Sioned Williams MS, Plaid Cymru speaking during a Plaid Cymru Debate in the Senedd, 25th September 2024. Jane Dodds MS, Welsh Liberal Democrats speaking during Questions to the First Minister, 8th October 2024. Gareth Davies, MS Welsh Conservatives speaking at Questions to the Cabinet Secretary for Social Justice on the 16th October 2024.

Political Party ● Plaid Cymru ● Welsh Labour ● Welsh Conservatives ● Welsh Liberal Democrats

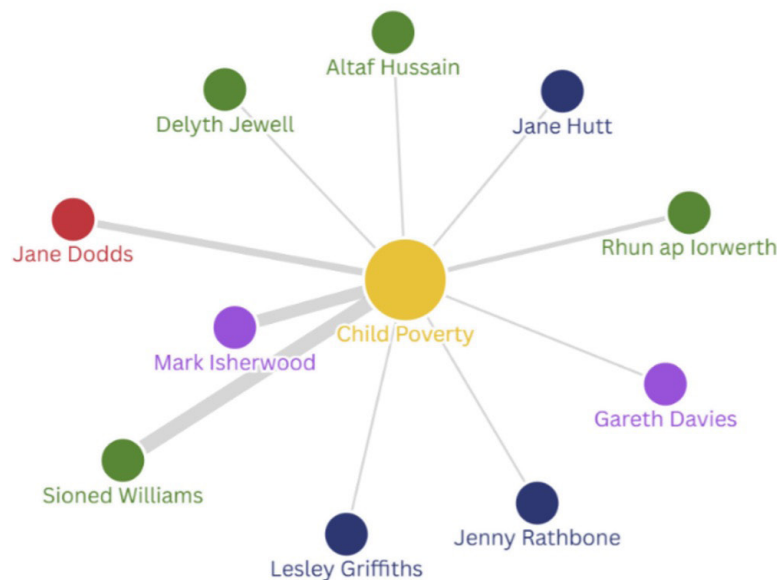


Figure 2 Senedd references to CCfW in relation to the topic of Child Poverty in debates and Committees (April 2023-Jun 2025). Data from internal CCfW quarterly reports.

The Child Poverty Strategy for Wales, launched in January 2024, committed to applying a children’s rights approach across programmes, incorporating poverty into Education and Training Inspectorate for Wales (ESTYN) inspections, and embedding the UNCRC within the new Curriculum for Wales.

The Commissioner contributed to a joint sector-wide critique of the final strategy, specifically highlighting the lack of measurable targets, published by 14 key organisations, including Oxfam Cymru, NCPCC Wales, Barnardo’s Cymru, Children in Wales, and Citizens Advice, to ensure a united voice on the need for a more ambitious approach. The strategy was published without an accompanying action plan; however, further progress emerged with the development of the Child Poverty Strategy Monitoring Framework in October 2024, shaped by an External Reference Group on which the Commissioner sits as an observer.

While the final strategy is not all the Commissioner and partners had hoped for, the joint platform facilitated a united voice that remains a powerful mechanism to continue holding the government to account over child poverty. This case study demonstrates how partnerships can amplify children’s voices, align sector priorities, and ensure that concerns remain on the political agenda, even when change is incremental.

4.1.4 Case study: **Amplifying young people's voices: How the children's commissioner for Wales is shaping policy through real-time insights**

In January 2024, CCfW launched Monthly Matters, a series of short, accessible surveys designed to capture the voices of children and young people on the issues that matter most to them.

Engagement with Monthly Matters snapshot survey by topic



Figure 3 Levels of Engagement Across Monthly Matters Topics

Responses have since been gathered from more than 23,900 children and young people. Children and young people have shared their views on topics ranging from school dinners and playtimes to smartphones, housing, online safety, and human rights. A key strength of Monthly Matters lies in its agility and speed: within days of an issue emerging, the Commissioner's office can harvest a rich snapshot of the experiences and perspectives of children and young people across Wales, ready to inform ongoing debates, government consultations, and media coverage.

The impact of Monthly Matters has been immediate and visible. Findings have been quoted in Senedd debates, featured on national media, and used to strengthen evidence given to parliamentary committees.

When the April 2024 survey highlighted concerns about school dinners, Tom Giffard MS raised the findings in the Senedd, asking what action would be taken to ensure children did not go hungry. The issue was then covered by BBC Wales and ITV News, bringing children's voices directly into public discourse and putting pressure on the government to act.

In other areas, the Commissioner has used Monthly Matters survey evidence to support expert testimony; at a Petitions Committee evidence session on mobile phones in schools, before the Health and Social Care Committee on childhood obesity, and in advocacy with Ofcom regarding online safety.

The launch of Monthly Matters has given children and young people in Wales a new, powerful platform to raise their voices. By capturing their experiences in real time, the Commissioner has been able to highlight emerging issues, respond rapidly to government proposals, and ensure that children's voices are not an afterthought but a foundation for policy. The snapshot surveys are part of a broader transformation in how the Commissioner's office collects and uses evidence. Monthly Matters sits alongside Ambitions for Wales data, case management insights, and national datasets such as the Child Measurement Programme for Wales and the School Health Research Network survey. Together, these sources provide a systematic and detailed evidence base of the experiences and perspectives of children and young people in Wales.

4.1.5 Responding to ambitions for Wales: Ensuring every child is heard

"Adults should listen to us and care about what we say."

Ambitions for Wales, 2022

This simple statement sits at the heart of CCfW's strategic commitment to be Here for All Children. Responding to the findings of AfW, the CCfW launched the Monthly Matters surveys to facilitate direct and regular engagement with children and young people on a range of key issues, and to amplify their voices and priorities with politicians, the media, and other stakeholders in spaces where decisions are made.

Across all age ranges and demographic groups participating in the AfW consultation, children and young people felt that politicians were the adults least likely to ask their opinion and care about what they say. In May 2025, the Monthly Matters survey focused on children and young people's engagement with politics and the upcoming 2026 Senedd election. More than 800 children and young people shared their views about how they access information, what issues matter to them, and how they want politicians to communicate with them. The findings were clear: many children and young people are interested in political issues but feel that the information available to them is not accessible, relevant, or delivered in ways they understand. In response, the CCfW has taken practical steps to make political communications more accessible for children. The CCfW has written to political parties ahead of the next Senedd election, urging them to create clear, child-friendly content about their manifesto commitments; written to the BBC to explore a Wales-based English-language children's news programme, similar to Newyddion Ni; and shared the findings with the Electoral Commission and the Senedd Commission to help shape their awareness-raising work in Wales.

In AfW, the majority of children and young people reported that talking to an adult they trusted made them happy, yet the data also illuminated significant inequalities in the inclusion of different voices and lived experiences. In particular, children and young people from low-income families were least likely to report that adults at home and school "care about what they say", and this group also reported the greatest barriers to participating in activities, clubs, and decision-making. As yet, there is limited evidence that this issue has been systematically addressed during 2023–26. Although initiatives such as Monthly Matters and the refreshed Ambassador network have expanded opportunities for engagement, there has been no targeted engagement with children from less affluent backgrounds. Further outreach and partnership work, particularly with community organisations, schools, and family support networks in areas of high deprivation, would help ensure that these children's experiences and priorities inform national policy and advocacy on an equal footing with their peers.

4.1.6 Gaps and challenges

Despite clear advances, not all children in Wales are benefitting equally from the protections, opportunities, and rights they are entitled to. Variation in local provision, fragmented evidence systems, and unequal attention to the needs of specific groups continue to create barriers. This section explores where further focus is needed to ensure that the Commissioner's work delivers consistently for every child, everywhere in Wales.

In particular, there are opportunities to improve how data is gathered, managed, and used, so that evidence not only informs national policy but also helps to track outcomes more consistently and identify where children are being left behind. Addressing these gaps will be essential for ensuring that the Commissioner's advocacy remains rooted in the strongest possible evidence and has the greatest impact for all children in Wales.

At present, data is fragmented across a range of documents and databases, with no centralised system for aggregation. Developing more joined-up approaches could make it easier to monitor progress and draw out insights. While external data is already being leveraged effectively to reinforce key messages, there is further potential to go beyond just presenting data and instead analyse data to present new findings or a more complete picture. For example, the CCfW could use and combine data. Data on child poverty is published from the End Child Poverty Coalition annually, showing levels of child poverty by Local Authority. When considered in relation to data from the Welsh Government on school absence, it becomes clear that the Welsh local authority with the highest levels of child poverty also has the highest school absentee rates. Combining data from different sources could provide valuable support for the Commissioner's work in calling for free learner travel and universal provision of school meals.

There is also scope to deepen engagement with underrepresented children and young people. Research and reports over the past strategic period have explored the experiences of specific groups, but applying a consistent equalities lens across all activities would help to identify and address gaps more systematically. The CCfW's broad network of partners provides a strong foundation for this. As demonstrated in the Child Poverty case study, collaboration can be a powerful way to amplify messages. A short review of current partnerships could help to identify which approaches are most effective and where further opportunities lie.

Taken together, these developments present an opportunity to build on strong foundations, enhance the reach of the CCfW's work, systemically amplify the voices of all children, and ensure that evidence, and engagement data and insights are used to their fullest potential.

4.2 A rights realiser

4.2.1 Overview

As a Rights Realiser, CCfW supports and educates children and young people to understand their human rights, while advising and working with public services to promote and protect those rights. In Wales, some public bodies, including the Welsh Government, have statutory obligations to raise awareness of the UNCRC, while others have committed to doing so voluntarily. CCfW works with these bodies to ensure a coherent, strategic approach to children's rights awareness across the country. Public services such as local authorities and health boards play a critical role in children's lives, and therefore in realising children's rights. CCfW engages with these organisations to ensure that children's rights are clearly understood and remain central to decision-making, helping to give children and young people in Wales the best possible opportunity to have their rights realised.



Work with schools on the curriculum for Wales

Review and refine 'The Right Way'

Explore a 'Child friendly Wales'

Create a model complaints policy

4.2.2 Key findings

As a Rights Realiser, CCfW supports and educates children and young people to understand their human rights, while advising and working with public services to promote and protect those rights. In Wales, some public bodies, including the Welsh Government, have statutory obligations to raise awareness of the UNCRC, while others have committed to doing so voluntarily. CCfW works with these bodies to ensure a coherent, strategic approach to children's rights awareness across the country. Public services such as local authorities and health boards play a critical role in children's lives, and therefore in realising children's rights. CCfW engages with these organisations to ensure that children's rights are clearly understood and remain central to decision-making, helping to give children and young people in Wales the best possible opportunity to have their rights realised.

Working with schools and education settings to deliver the new duty within the Curriculum for Wales on children's human rights

CCfW has engaged effectively with schools and education professionals and supported the Vale Rights Ambassadors to engage directly with children and young people. A children's rights learning and sharing event in March 2024 showcased best practices and inspired rights-based approaches across the public sector, attended by over 80 professionals, while CCfW has also facilitated training for early years professionals, schools, RSE curriculum leads, health boards, and councils, hosted workshops on anti-racism and child poverty, and produced Professional Learning Modules in collaboration with the Welsh Government. These activities have contributed to building knowledge and confidence among children and young people and professionals in embedding children's rights. In a nationally representative survey report published in September 2025, Beaufort Research reported that 99% of surveyed children and young people in Wales were aware of children's rights.

Reviewing and refining the 'Right Way' offer

CCfW has refined the Right Way framework to support public bodies in applying a children's rights approach to planning and delivering services, updating guidance documents and hosting a range of seminars, workshops, and conferences to promote and support the application of the framework. These efforts have effectively influenced policy and guidance in Wales, and The Right Way is explicitly referenced in Welsh Government strategies and endorsed in statutory guidance, with evidence of ongoing investment in the approach.

Exploring the ambition of a 'Child Friendly Wales'

CCfW explored the concept of a child-friendly focus for awareness-raising work through Wales for All Children with the Welsh Government, work with UNICEF UK, and participation in events such as the Child Friendly Cardiff Event in October 2023. While no direct outcomes have yet been recorded, these activities have laid the groundwork for potential future partnerships and strategic development.

Creating a model complaints policy for children

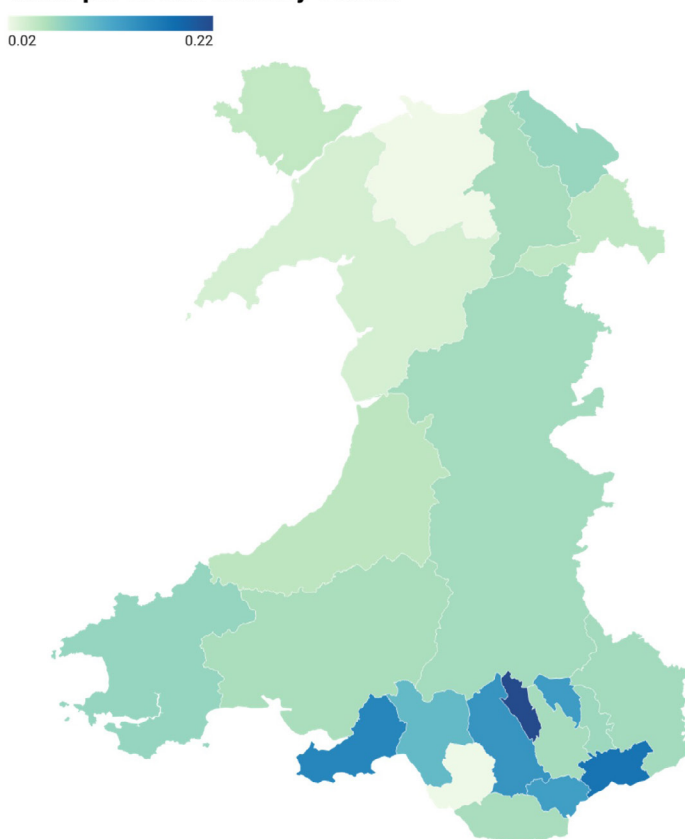
Work is underway to develop a model complaints policy with the Public Services Ombudsman, designed to empower children to raise concerns about issues affecting their lives. Activities to date have included scoping and data gathering (e.g., Beaufort data), although it is too soon to assess the outcomes of this ongoing process.

The case study Building Awareness and Capacity for Children's Rights in Schools and Education Settings demonstrates how CCfW is supporting schools to embed the new Curriculum for Wales duty on children's human rights, and through disseminating The Right Way framework which has effectively embedded systems, guidance, and networks that create the conditions for children's rights to thrive across public services.

4.2.3 Case study: **Building awareness and capacity for children’s rights in schools and education settings**

As a Rights Realiser, CCfW supports and educates children and young people to understand their human rights, while advising and working with public services to promote and protect those rights. In Wales, some public bodies, including the Welsh Government, have statutory obligations to raise awareness of the UNCRC, while others have committed to doing so voluntarily. CCfW works with these bodies to ensure a coherent, strategic approach to children’s rights awareness across the country. Public services such as local authorities and health boards play a critical role in children’s lives, and therefore in realising children’s rights. CCfW engages with these organisations to ensure that children’s rights are clearly understood and remain central to decision-making, helping to give children and young people in Wales the best possible opportunity to have their rights realised.

Visits per Local Authority School



Map data: © Crown copyright and database right 2021 • Created with Datawrapper

CCfW has worked extensively with children and young people, schools, and education professionals to effectively build capacity and raise awareness of children’s human rights within the Curriculum for Wales, delivering a wide range of initiatives responding closely to concerns raised by parents, carers, and professionals in the AfW survey, focusing on improving inclusivity and embedding children’s rights in education and learning environments.

CCfW teams have engaged children and young people in UNCRC rights awareness sessions in over 130 schools and educational settings, between April 2023 and July 2025. Additional, conversations about specific topics such as vaping were also held. While Vale Rights Ambassadors have delivered 42 workshops reaching over 1,200 children. The Ambassadors also developed a board game designed to teach children about the UNCRC.

Figure 4 Number of sessions exploring the UNCRC run by CCfW per local authority maintained school, school figures from Welsh Government School Census, 2024.

CCfW has delivered training for early years professionals, schools, health boards, and councils, and participated in workshops on anti-racism and child poverty. Training was provided to Relationship and Sex Education (RSE) curriculum leads, and Professional Learning Modules were developed in collaboration with the Welsh Government.

According to feedback collected by the CCfW, participants found the training highly informative, engaging, and relevant to their roles. The most valued aspects were learning about the UNCRC and children's rights and exploring how to apply and promote them in everyday practice. Activities such as the Body of Rights and Step Forward exercises, case studies, group discussions, and interactive elements were highlighted as particularly effective. Attendees also appreciated gaining a better understanding of the role of the CCfW, how to access advice and support, and the resources available for professionals, children, and families. The delivery was praised as clear, enthusiastic, and friendly, with engaging presentations, workshops, and visual tools like posters and videos. For some, the training served as a refresher; for others, especially those new to children's services, it provided an invaluable foundation. Overall, participants left with greater knowledge, confidence, and motivation to embed and advocate for children's rights within their roles. The programme has also raised awareness among children and young people, for example the ESTYN inspection report for Golftyn C.P. School (2024) highlighted pupils creating a video for the CCfW about their rights, demonstrating increased awareness and participation.

Through this approach, CCfW strengthened understanding of children's rights, built capacity across the education and public sectors, and supported children to actively express and advocate for their rights, with Vale Rights Ambassadors contributing directly to engagement activities.

4.2.4 Case study: The right way in practice – embedding a children's rights approach across public services

Over the past two years, the Commissioner's office has refined and strengthened The Right Way framework, supporting public bodies in Wales to apply a children's rights-based approach in planning and delivering their services. This includes updating The Right Way: A Children's Rights Approach to Education in Wales and producing and launching A Children's Rights Approach to Tackling Poverty.

Alongside these key resources, the office has worked directly with practitioners and policymakers to deepen their understanding of rights-based practice. In March 2024, a national seminar hosted by CCfW brought together more than 80 professionals to explore how The Right Way can shape decision-making processes across sectors. The team also contributed to Welsh Government communities of practice, convened a Poverty Conference in May 2025, and hosted The Right Way Conference in North Wales in March 2025 with a focus on ALN. These activities have consolidated the growing network of professionals across Wales who are actively applying The Right Way principles to their work with children and young people.

Profound outcomes of these efforts are emerging in both national strategies and sectoral guidance. In April 2025, the Welsh Government's new Mental Health and Wellbeing Strategy (and its companion Suicide & Self-Harm Strategy) explicitly included a Children's Rights Impact Assessment, referencing the Children's Commissioner and the five Right Way principles. The refreshed statutory guidance Wales – a Play Friendly Country now explicitly endorses The Right Way as best practice in embedding children's rights and participation, while the 2024 Play Sufficiency Assessment Toolkit references the framework as a practical tool for applying the National Participation Standards. Similarly, the 2025 children's version of Raising Awareness of Children's Rights in Wales endorses the framework, encouraging organisations to adopt The Right Way. Draft guidance on Youth Work in Wales, Delivering for Young People (2024) also directs local authorities towards The Right Way as a foundation for developing a human rights-based approach. The CCfW continues to develop the Right Way approach and will shortly be publishing a Right Way guide to budgeting. The framework is increasingly applied in practice, positioning children's rights as a central principle in Welsh public services.

4.2.5 Responding to ambitions for Wales: ensuring rights are realised

The AfW consultation amplified the importance of ensuring that children's rights are realised in Wales, and underpins the CCfW's strategic commitment. Children and young people expressed their desire for more opportunities to learn about their rights and how to use them, while parents, caregivers, and professionals called for enhancing awareness of children's rights across schools and public services, particularly in relation to mental health support, bullying, and inclusion for children with ALN, as well as more support for parents to help children to "develop positive attitudes towards difference" from an early age. Children and young people, parents, and caregivers consistently recommended that children and young people are supported to be more aware and inclusive of differences, including disability, gender identity, LGBTQI+, race, and religion.

These insights have shaped the Commissioner's approach as a Rights Realiser, embedding rights education across the Curriculum for Wales, refining The Right Way framework to strengthen professional accountability, and supporting public bodies to apply children's rights principles in policy and practice.

Children and young people from lower-income families, those with disabilities, and those who identify as neither boys nor girls, reported higher levels of being treated differently because of who they are. Sustained focus on rights education and professional practice in these areas is needed to close these gaps and ensure that the realisation of children's rights is consistent and equitable across Wales. It is therefore critically important to strengthen the reach and inclusivity of rights education to ensure all children see their experiences reflected. Expanding the Commissioner's children's rights awareness education to include a stronger focus on difference, including disability, race, gender identity, and other protected characteristics, could help children and professionals to explore how rights apply in diverse contexts and challenge the inequalities highlighted through AfW. This approach would deepen understanding of children's rights as lived experiences, not abstract principles, and support more consistent realisation of those rights across Wales.

Professionals participating in AfW frequently highlighted the need to build the capacity of parents and caregivers to help children and young people to understand and respect differences, from an early age. The Anti Bullying Alliance has produced a Parents and Carers Pack for Wales (2024) designed to help parents start conversations about bullying, including themes of difference and respect. Through the Parents Connect Wales initiative, Children in Wales have developed training that helps parents and caregivers to learn about children's rights, and to build their capacity to play an active role in promoting their children's voices and participation in decision-making. However, these are not national programmes and would require investment and scaling to be available to all parents. This could be a potential area of awareness-raising for CCfW, responding to the concerns raised in AfW.

4.2.6 Gaps and challenges

As a Rights Realiser, CCfW has made substantial progress in strengthening awareness of children's rights and supporting public services to embed these rights in practice. However, there remain key areas where further action is needed to ensure that children can fully understand, exercise, and influence their rights. Initiatives such as Child Friendly Wales and the model complaints policy provide important opportunities to deepen this work. Preliminary discussions with key stakeholders including the Welsh Government, UNICEF UK, and participation in events like the Child Friendly Cardiff Event in October 2023, have explored how a child-friendly approach could enhance awareness-raising, yet tangible outcomes are still emerging. Similarly, development of a model complaints policy to empower children to raise concerns is underway, with scoping and data-gathering activities, including analysis of Beaufort data, laying the groundwork for future implementation. Advancing these initiatives will be critical to ensure children's voices are consistently heard and that systems respond effectively to their rights and concerns.

While progress in schools and education settings has been notable, evaluations of training have only been conducted with professionals. A more comprehensive system to track outcomes in schools for both children and professionals is needed to understand the impact of the work and identify gaps. Additionally, professionals participating in the AfW survey also highlighted that parents and caregivers would benefit from additional training and support to help their children fully exercise their rights and wellbeing. Addressing this gap would reinforce rights-based and inclusive practices within families and home environments.

The Right Way framework has become a widely recognised and valued tool in Wales, yet there are opportunities to extend its reach and influence. Embedding a children's rights approach consistently across public services is an ongoing endeavour, and strengthening the visibility and accountability of The Right Way through mechanisms such as a Right Way scrutiny test for new legislation, a public-facing dashboard, or statutory reinforcement of participation rights under Article 12 of the UNCRC, could ensure that children's voices continue to inform policy, practice, and decision-making. Tracking adoption in practice across schools and organisations would further support evidence-based improvements, demonstrate tangible outcomes, and sustain momentum.

By addressing these gaps, the CCfW can continue to fulfil its Rights Realiser role, ensuring that all children in Wales are empowered, informed, and supported to exercise their rights fully, and that public services are accountable and responsive to their needs.

4.3 A truth teller

4.3.1 Overview

As a Truth Teller, CCfW supports and empowers children and young people to share their diverse experiences with decision makers. By shining a light on specific issues and amplifying unheard stories through communications and engagement work, CCfW ensures that children's lived experiences, both positive and negative, inform its priorities and drive awareness-raising and action. CCfW works to ensure that these insights play a central role in shaping policy development and implementation across Wales, influencing the decisions of public bodies, strengthening accountability, and advocating for systemic improvements. Leveraging the Commissioner's unique position in Welsh civic life, CCfW engages directly with decision makers, government officials, and national media outlets to ensure that children's voices are heard and acted upon.



Support COVID-19 recovery

Pursue 'No Wrong Door' model

Convene annual Child Poverty Summit

Review ALN Act implementation

Review statutory guidance and bullying

Explore broader inequalities

Understand where children live

Tackle key service provision

Address inconsistent DBS checks

4.3.2 Key findings

As a Truth Teller, CCfW has amplified children and young people's experiences to influence policy, practice, and public discourse in Wales. Across multiple thematic areas, the organisation has ensured that the voices of children and young people inform decisions and drive systemic change. Through evidence-based awareness-raising, targeted research, and active engagement with children and young people and public bodies, CCfW has amplified the lived experiences of children across multiple areas. The Truth Teller role has led to measurable policy influence, improvements in statutory guidance, and heightened public awareness of systemic challenges affecting children, particularly in mental health, child poverty, ALN provision, inclusion, and safeguarding. Ongoing initiatives, such as the No Wrong Door model and broader inequality work, continue to embed children's voices in decision-making and service delivery.

Supporting children and young people to recover from the Covid-19 pandemic

CCfW contributed substantial evidence to the UK Covid-19 Inquiry, including witness statements, reports, meeting notes, and correspondence from 2020–2022. The Commissioner provided oral evidence in February and March 2024, focusing on the use of children’s rights impact assessments in shaping government decisions. CCfW is also a core participant in Module 8 (Children and Young People) of the Inquiry, with evidence sessions conducted in September 2024 and June 2025. The February–March 2024 sessions generated media coverage highlighting school closures, and the experiences of Welsh children and young people are being specifically considered in the Inquiry.

Mental health of Children and pursuing the No Wrong Door model

The CCfW has long promoted a No Wrong Door model, the concept of coordinated services that provide a seamless experience for children and families seeking support. CCfW has continued to promote this model through direct engagement with every health board in Wales throughout this strategic period. The No Wrong Door Approach to Neurodiversity: a book of experiences was launched in March 2023, an influencing plan developed, and a series of Mental Health Roundtables hosted.

The No Wrong Door approach to neurodiversity has gained recognition in plenary sessions, press coverage, and joint Healthcare Inspectorate Wales (HIW) & Estyn reviews, highlighting ongoing gaps in pre- and post-diagnostic support. The No Wrong Door model has also contributed to the creation of dedicated wellbeing hubs providing 24/7 support for young people in crisis, including The Hangout in Cardiff (September 2023) and a second site in Barry (November 2024), and the Bro Myrddin Wellbeing Hwb in Carmarthen (July 2023).

Convening an annual national child poverty summit to challenge and influence Government and services on action relating to child poverty

CCfW and partners convened Wales’ first annual national Child Poverty Summit, producing a summit report that informed consultation responses to the Welsh Government’s Draft Child Poverty Strategy. Recommendations, including the use of CRIA and embedding UNCRC principles, were referenced in the Child Poverty Strategy for Wales, in Senedd debates, and in reports by the Equality and Social Justice Committee. While not all recommendations were adopted, the strategy now explicitly commits to a children’s rights approach across programmes, Estyn inspections on poverty, and embedding UNCRC principles in the new Curriculum for Wales. A monitoring framework was also published in October 2024, providing oversight of implementation.

In parallel, CCfW joined the Welsh Government’s working group on Streamlining Welsh Benefits, to advance the calls from its 2019 Charter for Change report on tackling child poverty. Central to this is the principle of passporting or auto-enrolling eligible families for all relevant benefits once local authorities hold evidence of their financial circumstances. As part of the wider package of measures to tackle child poverty, ensuring that families receive their full entitlements remains a key priority. To support this, CCfW held multiple meetings with officials and submitted a summary of written evidence capturing children’s voices and lived experiences in Wales to the UK Ministerial Taskforce on Child Poverty. This strand of work continued throughout 2025, feeding into the delayed UK Government Child Poverty Strategy.

Effectiveness and consistency of the implementation of the Additional Learning Needs (ALN) Act across Wales

CCfW influenced the implementation of the ALN Act through partnerships, evidence submissions, and participation (as an observer) in the ALN Reform National Steering Group. Activities included producing a video highlighting families’ experiences, responding to legislative consultations, and providing individual support and advice to 196 cases relating to ALN. Outcomes included government adoption of recommendations on workforce planning and resources, citation of CCfW’s joint report in Senedd debates, and references in Estyn reports and the Draft Disabled People’s Rights Plan (2025–2035) highlighting Welsh-language provision for children with ALN.

Establishing why statutory guidance is seemingly not tackling bullying in schools

CCfW has undertaken a series of activities to strengthen anti-bullying policy and practice, particularly in relation to racism. Drawing on its own research such as *Take it Seriously*, which highlighted children's experiences of racist bullying in secondary schools, the Commissioner has pressed for clearer guidance on how schools record and address such incidents. This included responding to consultations in 2023 and 2025 on guidance for Gypsy, Roma and Traveller learners and on the Welsh Government's draft Rights, Respect, Equality framework. As a result, the Welsh Government has accepted recommendations to ensure that schools monitor prejudice-related bullying more effectively, with specific categories for racist incidents based on factors such as ethnicity, religious heritage, or refugee status. The updated statutory anti-bullying guidance now requires schools to record all bullying incidents by type, embedding stronger accountability and ensuring children's rights and experiences are at the centre of anti-bullying efforts.

Exploring broader inequalities, including disability, race and LGBTQ+

Racism: The Commissioner's 2023 report on racism in schools, *Take it Seriously*, set out 14 recommendations for the Welsh Government, 11 of which were accepted in full, in principle, or in part. These included commitments to update statutory anti-bullying guidance, develop new training and professional learning resources, strengthen support for school governors, and improve the recording and reporting of racist incidents. Estyn's 2024 Annual Report, *Towards an Anti-Racist Wales*, echoed the Commissioner's findings, further reinforcing the need for systemic change.

Disability: In March 2025, the Commissioner hosted an event in St Asaph with over 80 professionals, co-designed with young people from St Christopher's School, Wrexham. Participants reported that they would adapt their approaches and share learning to embed children's voices in service development as a result. The young people involved said they felt listened to, gained confidence, and saw their contributions shaping practice in real ways. Promoting voice and agency, CCfW has supported children and young people with disabilities to influence revisions to play guidance, and the refreshed play sufficiency statutory guidance Wales – a Play Friendly Country now includes an enhanced chapter about consultation, participation and engagement, including reference to the Right Way framework and guides. CCfW has also highlighted issues in relation to learner transport, publishing a policy position on Learner Travel outlining concerns and commitments. Supporting access to education, CCfW has encouraged the National Attendance Taskforce to consider the rights and needs of disabled, and held the Welsh Government to account on the delivery of the recommendations resulting from the Senedd's Children's Committee Inquiry. CCfW has continued to advocate for children with ALN, sharing casework insights through the ALN Implementation Steering Group and contributing to Audit Wales' review of system sustainability. CCfW supported families to produce *The Constant Fight*, a short film exposing the ongoing challenges within the ALN system, which was shared with the Cabinet Secretary for Education and informed the Government's review of the legislative framework. The Commissioner has also contributed to the development of the national vision and action plan for children and young people with a learning disability, led by Learning Disability Improvement Cymru within the NHS Executive. Supporting employment opportunities, CCfW has raised concerns about reduced access to careers advice and work experience for young people with disabilities, engaging the Minister for Culture, Skills and Social Partnership to explore future funding options, and contributed to the Welsh Government's Disability Taskforce Children and Young People's Working Group, developing an Action Plan for consultation in spring 2025.

Gypsy, Roma, and Traveller children: Through consultation responses, the Commissioner influenced the Welsh Government's 2023 *Celebrate and Participate* guidance, which incorporated key recommendations such as training for school staff, referencing the national framework on emotional and mental well-being, and adding practical resources including hyperlinks to new guidance and the handbook for home educators.

LGBTQ+: The Commissioner met with LGBTQ+ groups and co-signed a letter with charities to the Welsh Government calling for greater protections and specific measures for trans learners, ensuring that their needs are explicitly considered within education policy.

Tackling the lack of provision of key services including specialist schools and education placements

CCfW highlighted gaps in educational provision, including specialist schools and education placements, through a spotlight report on healthcare settings. Outcomes included BBC coverage, Senedd discussions, and a government commitment to update the Supporting Learners with Healthcare Needs guidance, clarifying expectations for local authorities and ensuring learners receive approximately 25 hours of education per week.

DBS checks and Estyn guidance

A roundtable on DBS checks took place in September 2025 to address inconsistent practice in schools and local authorities, although outcomes are not yet recorded.

Accommodation for children and their families: The Commissioner has been actively investigating the impacts of housing and homelessness on children and young people in Wales. In April 2025, the spotlight report *How housing and homelessness affects children and young people* documented children's experiences of overcrowding, damp and mould, lack of privacy, instability, and the negative effects on their education and mental health. More outcomes of this work are discussed in the Challenger section.

The case studies in this section focus on the No Wrong Door initiative and projects related to the ALN Act, illustrating how the CCfW's role as a Truth Teller amplifies children's voices, raises public and policy awareness, and contributes to meaningful change across Wales. The *Narratives of Inclusion: The Wider Reach of No Wrong Door* case study demonstrates how CCfW has contributed to systemic change and how powerful messages have contributed to overarching frameworks that strengthen the rights of children and young people across policies and institutions, while the *CCfW's Role in Implementing the ALN Act through Case Work* case study highlights the tangible impacts on individual children and families.

4.3.3 Case study: Narratives of inclusion: The wider reach of no wrong door

The widescale adoption of the No Wrong Door approach and CCfW's promotion of seamless, joined-up services to enable children and families to access the help they need without unnecessary barriers, have been a powerful achievement over the past strategic period. The No Wrong Door principle has been firmly embedded into the Welsh policy agenda by the CCfW, with the powerful message that children and young people and families should never be turned away when seeking help, but rather guided to the right support.

This awareness-raising responded closely to key concerns raised by parents, carers in the AfW survey, many of whom emphasized the need for more accessible mental health services, reduced wait times, and increased availability of support for children and young people. It also aligned closely with concerns raised by professionals in the AfW consultation, who consistently called for accelerated referral processes and better integration of services to address mental health needs promptly. The CCfW 2022 report *Making Wales a No Wrong Door Nation* reframed the concept into a national ambition. It called on the Welsh Government and Regional Partnership Boards to ensure that public services "wrap themselves around individuals and families", rather than expecting children and young people and families to navigate complex, fragmented systems. This was followed up by *A No Wrong Door Approach to Neurodiversity* in 2023.

As a result of CCfW awareness-raising, the Welsh Government has adopted the model and embedded No Wrong Door into the NEST/NYTH framework for the mental health and neurodevelopmental support of children and young people. This established it as a practical organising principle for how services should

be designed and delivered. No Wrong Door is now embedded across policy documents relating to Mental Health and Neurodiversity. The Welsh Government children's Mental Health Strategy Impact Assessment reiterates that a No Wrong Door approach is critical, and the Substance Misuse Treatment Framework flags a No Wrong Door approach for children and young people's mental health support.

The No Wrong Door service model approach has swiftly and seamlessly been adopted across other domains of public policy. The approach is now referenced across Senedd debates and Committees, in multiple areas where individuals face complex, cross-cutting needs:

- **Healthcare and Education:** Hefin David MS argued for a streamlined No Wrong Door approach across all public services, particularly where health and education intersect. 13th November 2025, Debate on the Children, Young People and Education Committee Report.
- **Learning Disability:** Again, Hefin David MS has emphasised the importance of support that adapts to families rather than vice versa, calling for a No Wrong Door approach. 4th December 2024, Member Debate under Standing Order 11.21(iv): Care for setting for autism and learning disability.
- **Homelessness:** Ministers and Members, including Julie James MS (9th November 2023 Local Government and Housing Committee) and Mabon ap Gwynfor MS (18th October 2023, Welsh Conservatives Debate: Homelessness), have explicitly cited the principle to tackling homelessness, highlighting the need to avoid "ping-ponging" individuals between services.
- **Warm Homes and Poverty:** Julie James MS (12th March 2024 Statement by the Minister for Climate Change) and Peredur Owen Griffiths MS (12th July 2023 Finance Committee Debate) both referenced the idea in relation to energy advice, council tax support, and broader anti-poverty measures, ensuring that households in need are directed into the right safety nets.
- **Employment and Redundancy Support:** Vaughan Gething MS invoked No Wrong Door in calls for coordinated responses to mass redundancies, underlining the need for seamless pathways between the Department for Work and Pensions (DWP), local authorities and Welsh Government. (17th January 2024, Topical Questions)
- **Healthcare System Design:** The Health and Social Care Committee, 8th February 2024, has discussed it in the context of patient journeys, challenging the hospital-centric model and arguing that services should adapt to the needs of individuals.
- **Welsh Benefits System:** On the 25th September 2025, the Equality and Social Justice Committee explored No Wrong Door in relation to welfare delivery, linking it to one-stop shop pilots in Scotland.

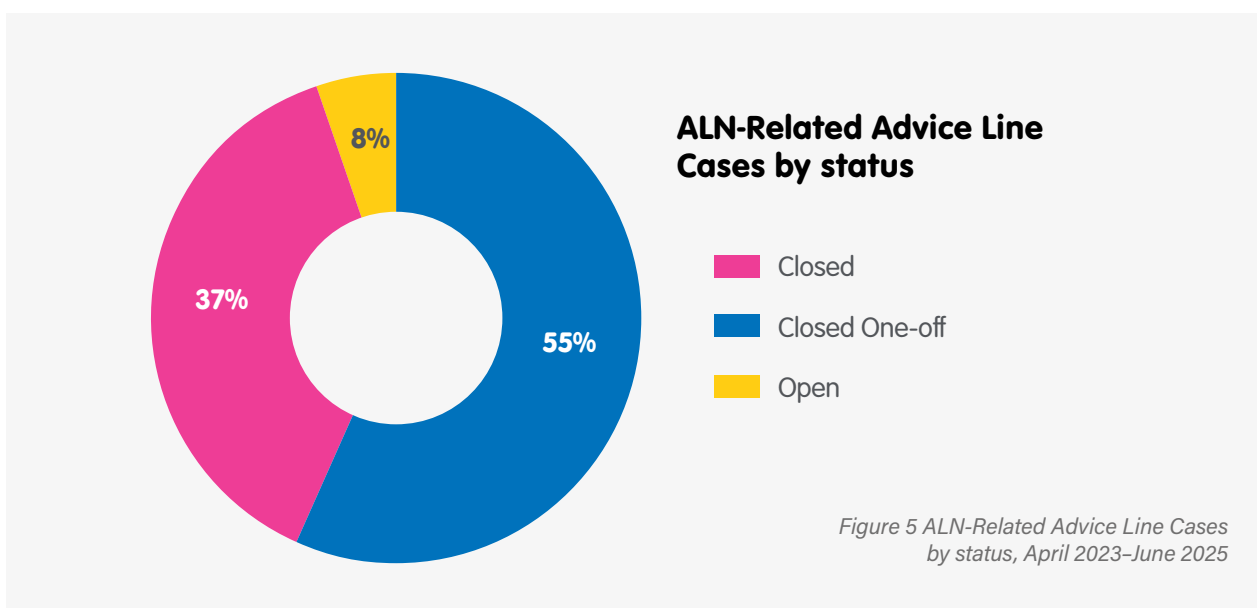
The expansion of No Wrong Door into these diverse areas reflects both its versatility and its resonance. It provides a unifying language for service integration across domains as diverse as housing, poverty, education, health, and social security.

Crucially, this diffusion and widescale adoption underscores the influence of the Children's Commissioner's agenda-setting role: by crystallising No Wrong Door as a core expectation for public services, the Commissioner has helped embed a principle that policymakers now apply well beyond its original mental health and neurodiversity context. From its roots in children's services, the No Wrong Door principle has grown into a cross-sector organising idea in Wales. It now serves as a shorthand for responsive, joined-up public services across the Senedd's work, from homelessness to poverty to welfare reform. What began as a call from the Children's Commissioner has become a broader national ethos for service delivery.

4.3.4 Case study: CCfW's role in implementing the ALN act through case work

The CCfW Advice Service offers free, confidential, and impartial guidance to individuals seeking support with a wide range of issues that fall within the remit of the office. The service helps people to understand their rights, explore available options, and access practical solutions, whether related to educational entitlements, social services, health access, and complaints. In the period from April 2023 to June 2025, the service dealt with 1520 cases.

In relation to ALN cases, where relevant, the team liaises with the relevant authorities (local authority, schools) to support children and young people to access their rights in relation to the ALN Act. From April 2023 to June 2025, 198 cases (13%) were received by the Advice Service related to ALN.



During this period, 37% of these cases were resolved through liaison action by the CCfW, and case summaries of the outcomes were recorded. An analysis of these cases provides a rich contextual picture of how the CCfW has supported the implementation of the ALN Act.

Families used the service to report a range of issues relating to ALN, including delays in assessments, gaps in provision, and unsuitable placements.

The CCfW has supported families to secure positive outcomes to these challenges, including more appropriate placements where children's needs had not been met, arranging or amending school transport provision to ensure that children could access education, restoring or increasing provision hours where children had been left with little or no support, facilitating Education Otherwise Than at School (EOTAS) packages when health needs or placement breakdowns left pupils without education, and prompting the completion of delayed assessments and Individual Development Plans.

These case outcomes made a tangible difference to children's lives: children and young people were able to access education with the right support, parents gained clarity about their rights and entitlements, and local authorities were reminded of their responsibilities and encouraged to comply with the ALN Act.

As an illustrative example, one parent contacted the Commissioner after discovering that their child, despite having an Individual Development Plan in place, was not receiving the agreed support in school. This lack of provision was leaving the child without the help they needed to access learning on equal terms with their peers. CCfW raised the issue directly with the local authority, pressing for clarity and immediate action. The authority subsequently acknowledged the gap and arranged for additional support to be put in place. For the family, this intervention meant the difference between frustration and resolution; for the child, it meant receiving the support they were legally entitled to, and being able to learn in a way that reflected their needs.

Stories like this show how the Commissioner's work has not only provided advice but has also delivered practical outcomes that improve children's lives. Each case resolved is also a signal to local authorities: that the duties of the ALN Act must be upheld, and that children's right to education is not negotiable.

4.3.5 Responding to ambitions for Wales: Truth teller

Bullying

The AfW consultation revealed persistent concerns among children and young people about bullying, particularly for people with protected characteristics, alongside safety concerns at school, in the community, and online. Professionals echoed these concerns, citing inconsistent reporting and variable responses to bullying issues from schools and local authorities.

In response, the Commissioner has used her platform as a Truth Teller to highlight these lived experiences and promote system change. This has included research into racism and bullying in schools that has influenced the updated statutory anti-bullying guidance that now requires schools to record incidents by type, producing The Right Way Guide for Education, which covers issues of bullying and inclusion, and working with Ofcom through Youth Advisory Panels to address online safety and misinformation. These actions reflect the Commissioner's role in transforming children's concerns into policy reform and sector learning.

Mental health

Mental health emerged as one of the most pressing concerns in the AfW consultation, with responses from children and young people, parents, caregivers, and professionals all highlighting long waiting times, inconsistent provision, and a lack of early intervention and preventative support. Many children and young people and families described feeling anxious, overwhelmed, or unsure where to turn for help, while professionals emphasized the urgent need for more support and improved coordination between health, education, and community services.

The majority of parents and caregivers responding to AfW were unsure about their ability to access mental health support for their children. Less than half reported knowing where to go to get mental health and wellbeing support for their children, and four fifths were not confident that they could access support quickly if they needed it.

As a Truth Teller, the Commissioner has consistently amplified these experiences to call for systemic change, using evidence from casework, the No Wrong Door model, and Monthly Matters surveys to highlight the human impact of fragmented mental health pathways. This advocacy has contributed to the refinement of the NYTH/NEST framework, strengthened accountability within the Welsh Government's Mental Health and Wellbeing Strategy, and informed scrutiny by Senedd Committees.

Child poverty

The AfW consultation highlighted child poverty as one of the most urgent and persistent issues affecting children's rights and wellbeing in Wales. Parents, caregivers, and professionals described the daily pressures of the cost-of-living crisis, including food insecurity, limited access to transport, and the declining availability of free or low-cost play and leisure opportunities. Participating children and young people expressed worry about their families having enough money to meet their basic needs, including food and housing, and their frustration that decision-makers often ignore these concerns.

In response, the Commissioner has used the evidence gathered through the AfW consultation and from ongoing casework to strengthen national advocacy on poverty and inequality. Powerful statistics drawn from the AfW data revealed the extent of children and young people concerns about the cost-of-living crisis, and this powerful evidence of the number of children in Wales worrying about having enough to eat was echoed in Senedd debates, and used to inform CCfW policy positions, consultations, and advocacy actions.

AfW data from professionals also highlighted the need for stronger support during the early years, particularly in communities experiencing deprivation. While the Child Poverty Strategy for Wales states that "investing in the early years ... should be central" to tackling poverty, dedicated advocacy and programme emphasis on early years support for families in the most deprived communities remains less clearly defined in the public domain. The importance of the first 1,000 days and family-level support is well recognised, yet there has been limited advocacy specifically targeting early years provision in areas of economic deprivation. Further strengthening of awareness-raising efforts and a sharper focus on inequalities are needed as part of ongoing work to address child poverty, including advancing rights-based early years provision through greater investment in community-based services. This aligns with the insights of AfW that children from lower-income families often feel least heard in decision-making. While the Commissioner's voice has influenced government strategy, there remains scope for deeper engagement with children and young people living in poverty to ensure their voices directly shape future action. Strengthening local partnerships with schools, community groups, and family support networks in areas of deprivation will be key to ensuring that the national commitment to end child poverty reflects the realities of those most affected.

ALN

The AfW consultation revealed that children and young people with disabilities and ALN were less likely to say they felt safe, happy, or listened to, and that these groups continue to face disproportionate barriers to full inclusion. Many families and professionals described the challenges children and young people face in accessing specialist support and participating fully in school and community life. Parents spoke about the limited availability of inclusive activities, clubs, and play opportunities, particularly in mainstream settings, which left some children feeling isolated or excluded from their peers.

Transitions between education settings were also identified as difficult for many children with additional needs, especially when consistent support or communication between services was lacking. These experiences highlight that inclusion is not only about being present in a school or classroom, but also about being able to take part, contribute, and feel valued in every aspect of daily life.

The AfW findings make clear that more needs to be done to ensure that children with ALN are not only supported but also fully included in learning, play, and community opportunities that help them to thrive alongside their peers. While some organisations, such as the Panathlon Foundation, provide inclusive events for children with ALN in Wales, the AfW data suggests that more research and awareness-raising are needed on this issue.

4.3.6 Gaps and challenges

While significant progress has been made in advancing children's rights and wellbeing in Wales, several areas continue to present challenges that require attention. Sustainable support for children's mental health remains a priority, and while the No Wrong Door model provides a valuable framework, its long-term impact depends on secure and consistent resourcing. Gaps persist in recognising mental health and wellbeing as integral children's rights issues, and schools often continue to prioritise academic outcomes over holistic wellbeing. Ensuring equal emphasis on both areas would help embed a more balanced approach, while more consistent access to counselling, CAMHS links, and peer-led programmes across schools is needed.

Variation in local authority provision continues to create postcode inequalities in areas such as school transport, additional learning needs, and discretionary funding. Greater transparency and accountability are required, with authorities clearly demonstrating how policies uphold children's rights. Enhanced monitoring and reporting could help highlight disparities and ensure that all children's experiences are considered.

Specific groups, including LGBTQ+ children and young people, face distinct challenges that remain underexplored. Although rates of reporting on sexuality in the Ambitions for Wales survey were low, LGBTQ+ children and young people were disproportionately likely to report being bullied. However, limited data and reporting make it difficult to fully understand and address their needs.

These gaps and inconsistencies underscore the importance of the Commissioner's Truth Teller role. By amplifying the experiences of children and young people, challenging inequalities, and highlighting where services and policies fall short, the office can ensure that decision-makers are held accountable and that children's voices remain central to shaping meaningful change.

4.4 A challenger

4.4.1 Overview

As a Challenger, CCfW is committed to challenging and supporting others to ensure that children's rights are realised in Wales. While partnership and collaboration remain central, CCfW speak up on behalf of children and young people and caregivers to challenge poor service provision, weak decision-making, and inadequate choices where these negatively impact children's lives. As a steadfast advocate for children and young people, CCfW holds duty-bearers accountable when standards fall short. With statutory powers to review a wide range of public services, CCfW has the mandate and the courage to engage in difficult conversations and rise to challenges to secure better outcomes for children. The approach is evidence-based and informed directly by the voices of children and young people, ensuring that actions and awareness-raising are grounded in both lived experience and robust data. Through this role of Challenger, CCfW aims not only to identify and highlight where change is needed but also to work constructively with partners to bring about sustainable improvements. This balance of accountability and collaboration is essential to ensuring that every child in Wales has their rights recognised, respected, and realised.



Challenge child poverty progress

Call for free public transport

Call for reform in services for care leavers

Explore online child safety

Review child protection procedures

Highlight unregulated accommodation

Challenge mental health support provision

Challenge efforts to tackle climate emergency

4.4.2 Key findings

Continuing to call for free public transport for children to tackle child poverty and the climate emergency

The Commissioner has consistently championed the case for free public transport for children as a means of addressing both child poverty and the climate emergency. Through evidence presented to the Petitions Committee, the Welsh Government Attendance Taskforce, and the inaugural Attendance Conference hosted by the National Academy for Educational Leadership (NAEL), as well as through position papers and formal responses to the Welsh Government's review into learner travel, this issue has remained high on the agenda. As a result, the Welsh Government's review into learner travel acknowledged these calls, which were also raised in Senedd debates alongside critical responses to the review. Media coverage has amplified the profile and significance of this work, and tangible shifts in policy have begun to emerge, including the introduction of reduced bus fares for under-21s, a new public consultation on revised operational guidance for learner travel, and the launch of a pilot £1 fare scheme from 1 September 2025.

Ensuring the radical reform of current services for children looked after and care leavers delivers real change

The Commissioner has actively lobbied the Welsh Government to ensure promised reforms for looked-after children and care leavers translate into meaningful improvements in their lives. Engagement with care-experienced young people in Neath Port Talbot, contributions to the European Network of Ombudspersons for Children, and the immersive Your Voice Senedd exhibition (November 2024) have amplified their priorities, including better emotional and practical support, involvement in care decisions, and dignity in daily life.

Reflecting these calls, the Welsh Government's August 2025 consultation on the Part 6 Code of Practice now emphasises direct involvement of children in care planning. Sector partners, including Association for Fostering, Kinship and Adoption Cymru, are expanding foster carer training on mental health support. The adoption of the Corporate Parenting Charter in September 2023, alongside the Commissioner's own Corporate Parenting Promise, further strengthens systemic accountability and ensures care-experienced young people help shape the services intended for them.

Exploring how safe our children are online

Recognising the growing risks children face online, the Commissioner prioritised this issue through ambassador events in Autumn 2023 and a February 2025 edition of Monthly Matters focused on misinformation, "What's real and what's fake online?" The findings were shared directly with Ofcom and informed responses to its proposals for protecting children from online harm. These activities ensured that the voices of young people shaped regulatory debates at a national level.

Questioning the effectiveness of governance in child protection procedures

CCfW has actively shaped how statutory safeguarding reviews operate, ensuring that lessons from serious cases lead to stronger protections for children. In 2023, the Commissioner responded to the Welsh Government's consultation on a Single Unified Safeguarding Review (SUSR) process, calling for greater transparency, publication of Child Practice Review (CPR) Terms of Reference, and clearer reporting duties. The CCfW also engaged stakeholders and the public through blogs, advice casework, and participation on the SUSR Ministerial Advisory Board.

This sustained awareness-raising contributed to significant reforms. The October 2024 SUSR Statutory Guidance integrated previous review systems, strengthened criteria for when reviews are undertaken, clarified the role of the National Independent Safeguarding Board, and established clear timelines and escalation routes for Action Plans. In January 2025, CPR Terms of Reference were published, further improving transparency. These changes demonstrate how the Commissioner's influence has ensured safeguarding mechanisms evolve with children's rights and protection at their heart.

Highlighting where children live in Wales

Through research, engagement, and evidence gathering, the Commissioner has brought national attention to children's experiences of housing and accommodation, including unregulated and unregistered placements. The Monthly Matters survey in January 2025 focused on housing, provided valuable insights into young people's perspectives, and fed into the spotlight report How housing and homelessness affects children and young people in Wales published in 2025. This report has already gained significant media coverage and been cited in debates, with Senedd members raising concerns that supplementary placements risked pushing children into unsafe accommodation. The Welsh Government's summary response to the Right to Adequate Housing white paper referenced the Commissioner's requests, particularly on embedding children's voices in future legislation. Crucially, the government has identified an evidence gap relating to dependent children under sixteen experiencing homelessness and has since begun participatory methodological research with children under 16 on housing matters, a direct outcome of this work.

Challenging the lack of appropriate mental health support in matching needs of children and young people in Wales

The Children's Commissioner has consistently challenged the lack of appropriate mental health support for children and young people in Wales, focusing on the mismatch between need and provision. A key part of this work has been supporting the development and roll-out of the NYTH/NEST framework, which promotes a joined-up, rights-based approach to mental health and wellbeing. In February 2024, a new training course on NYTH/NEST and children's rights, co-developed with young people, was launched, with 147 participants registered by October 2024.

The Commissioner's recommendations in her 2023–24 Annual Report also influenced the Welsh Government's decision to publish a children and young people-specific delivery plan within its 2025–28 Mental Health and Wellbeing Strategy, ensuring a more targeted responses to young people's needs.

Challenging government efforts to tackle the climate emergency

The Commissioner has ensured that children and young people voices are prominent in discussions about climate change, establishing a Young People's Advisory Panel subgroup on climate change in 2023 and creating multiple opportunities for young people to present their perspectives. Highlights include contributions to the Senedd's Climate Challenge Cymru event in June 2024, the "Your Voice, Your Future" session at the Adapting to our Changing Climate conference in November 2024, and the Monthly Matters survey on helping the environment. These initiatives not only enabled children to share their concerns and ideas directly with policymakers but also connected climate change to broader issues such as child poverty and transport. The Commissioner's awareness-raising has linked climate action with tangible policies, including the importance of affordable and accessible public transport for young people, demonstrating how children's environmental priorities intersect with everyday rights and opportunities.

The case studies in this section exemplify how the Commissioner's role as a Challenger both builds on strong foundations established by previous Commissioners and cultivates new growth that delivers direct benefits for children and families. Ending Profit in Children's Care reflects the deep, structural reforms that have taken root over time, shaped by earlier work and nurtured through ongoing awareness-raising. Championing Free Public Transport for Children and Young People in Wales demonstrates the emergence of tangible fruits of change, where sustained challenge has led to concrete shifts in policy and meaningful financial relief for families across Wales, although further work is needed to ensure that every child can benefit. Together, these examples highlight how persistent challenge ensures that systemic reform is embedded, while also delivering practical improvements that children and young people experience in their daily lives.

4.4.3 Case study: Ending profit in children's care

In the 2023–2026 Strategic Plan, one of the Commissioner's priorities was to ensure that the Welsh Government's pledge to deliver the "radical reform of current services for looked after children and care leavers" would lead to meaningful improvements in the lives of care-experienced children and young people in Wales. During this strategic period, the Commissioner has undertaken a range of activities in pursuit of this goal, including raising the profile of children's voices through the Your Voice Senedd exhibition. Importantly, this work also reflects a legacy of influence established by successive Commissioners. By building on evidence, awareness-raising, and recommendations developed over many years, the current programme of work shows how real impact in this area often depends on sustained pressure and commitment. Systemic change for vulnerable groups, such as children in care, has emerged gradually, as long-term awareness-raising is taken up, strengthened, and eventually embedded in government reform.

In 2019, the Commissioner's Annual Report called for reducing and ultimately ending profit-making in children's care services. The Commissioner has continued to advocate on behalf of these vulnerable children over time. In 2021, the Commissioner's Annual Report called on the Welsh Government to publish, by April 2022, a clear roadmap to phase out profit from the care of looked-after children. This recommendation was grounded in the testimony of children's own experiences of being placed far from home in settings run by for-profit providers, and in wider concerns about the stability and quality of care provided.

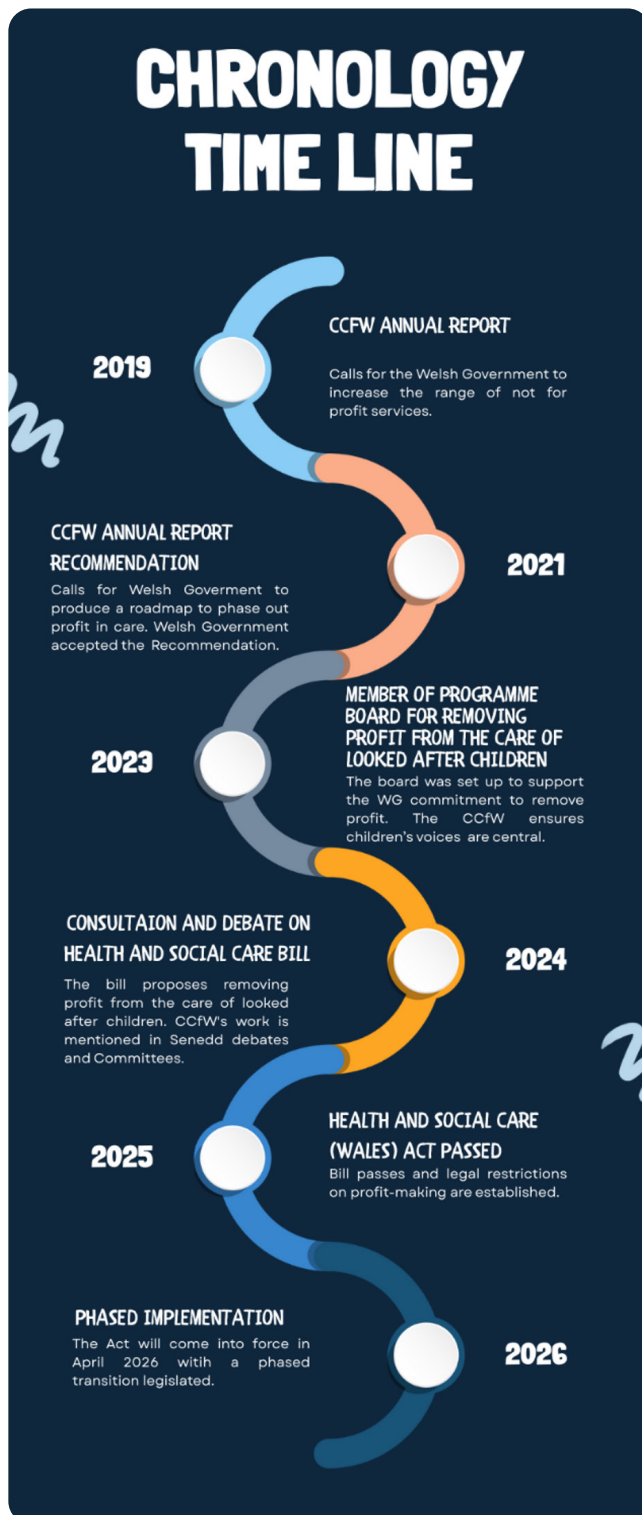


Figure 6 Timeline of policy reform for the care of looked-after children in Wales

The Welsh Government formally accepted the Commissioner's recommendation in 2021. Over the following years, the Welsh Government commissioned reviews of the evidence base, engaged providers and professionals, and consulted on the implementation of Welsh Government commitments.

The Commissioner also continued to raise awareness of this issue in correspondence with the Senedd and in meetings with ministers and later became a member of the Welsh Government's Eliminating Profit from the Care of Looked After Children Programme Board (2023-2025), ensuring children's voices and rights remained central as options were developed.

These steps culminated in the Health and Social Care (Wales) Act 2025, which enacts legal restrictions on profit-making in children's social care. The legislation introduced a phased transition: from April 2026, no new for-profit services can register; from 2027, existing providers cannot expand; and by 2030, new placements with for-profit providers will end, except in tightly controlled circumstances.

Whilst many voices contributed to the call to end profit-making in children's social care, the awareness-raising of the CCfW was critical in the achievement of these outcomes. In an evidence session on the Health and Social Care Bill, the First Minister, Mark Drakeford MS, explicitly credited the Commissioner's work as a key driver of the legislation. He stated: "The genesis of this policy was a report by the Children's Commissioner, Professor Sally Holland, where she specifically canvassed the views of children." This acknowledgement highlights how the former Commissioner's early intervention laid the foundation for change. It also illustrates the timescales often involved in policy reform: what began as a recommendation in a Commissioner's report took nearly a decade of awareness-raising, debate, and legislative process before becoming law.

4.4.4 Case study: **Championing free public transport for children and young people in Wales**

The CCfW has consistently called for free public transport for children and young people, arguing that it is essential both to reduce child poverty and to tackle the climate emergency. For families who rely on public transport, travel costs are a significant burden. With children in Wales attending school for thirty-eight weeks each year, the cost of daily travel quickly mounts, restricting access to education, training, work, social, and cultural opportunities.

Over recent years, this issue has remained high on the Commissioner's agenda, directly addressing concerns raised by parents, carers, and professionals in the AfW survey about the financial and practical barriers children face in accessing opportunities for engagement and development, including education, particularly in rural areas. Initiatives like the £1 bus fare scheme respond directly to these concerns by reducing transport costs, helping to remove key financial barriers, and enabling children and young people to access activities, resources, and learning opportunities more equitably across Wales.

Raising awareness on behalf of children and young people and families, the Commissioner has presented evidence to the Petitions Committee, contributed to the Welsh Government's Attendance Taskforce and the inaugural Attendance Conference of the National Academy for Educational Leadership, and responded formally to the Government's review of learner travel. Position papers, media engagement, and public communications have strengthened this message, ensuring that the need for affordable, accessible travel has remained firmly in the public and political eye.

The Learner Travel Summit held in May 2025 provided a further platform for the Commissioner's influence. At this national event, convened by Welsh Ministers, she brought forward evidence from children and young people and families to highlight how transport costs cut into already stretched household budgets and undermine school attendance. She underlined the case for free public transport for all children and young people, framing it as a right, a poverty intervention, and a climate action. The Commissioner's presence helped to ensure that the voices of children and young people, particularly those from low-income families and those with additional needs, were placed at the centre of the discussion. Her intervention reinforced concerns about inequities between local authorities, the lack of consistent provision, and how unaffordable transport undermines wider government initiatives on attendance.

These arguments have been reflected in the Welsh Government's response. The Welsh Government is consulting (as of June 2025) on revised Learner Travel Operational Guidance, which acknowledges the case for change, and debates in the Senedd echoed the calls the Commissioner has long championed. The Summit also acted as a launchpad for policy shifts: alongside it, the Government announced a pilot scheme of £1 single fares and £3 unlimited day tickets for young people aged 16–21, starting in September 2025, with an extension to 5–15-year-olds from November 2025. This was underpinned by budget commitments of £15 million over two financial years for 16–21s and a further £7 million for younger children.

The savings for families are substantial. A child who takes the bus to school and back, five days a week, across the school year would otherwise pay around £950–£1140 annually (estimated based on costs between £2.50–3 per bus journey). Under the £1 scheme the cost falls to £380, meaning a saving of between £570 and £760 per child, per year. Scaled across hundreds of thousands of children, this represents tens of millions of pounds of disposable income released back into household budgets across Wales.

Estimated comparison of costs for school bus travel with and without £1 bus scheme

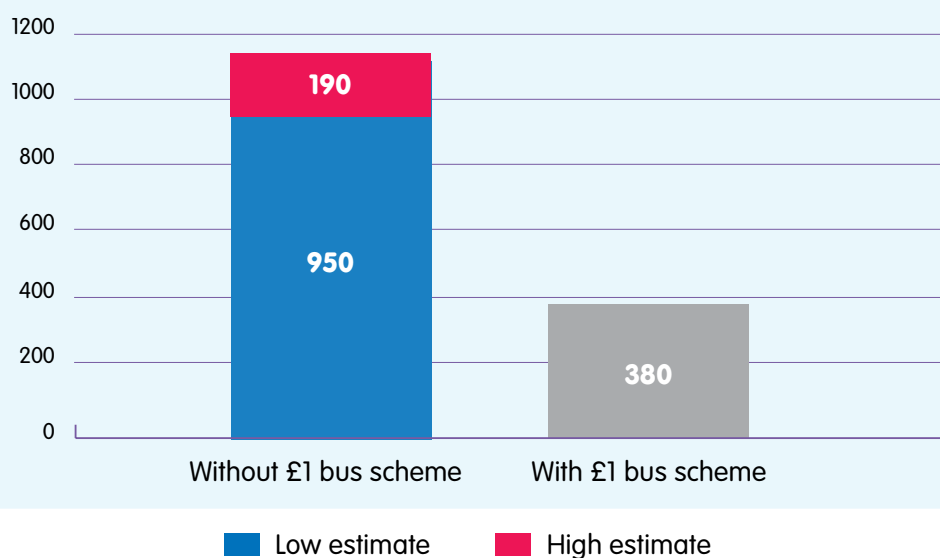


Figure 7 Estimated Annual Savings for Families under the £1 School Transport Scheme in Wales.

While these developments mark real progress, the Commissioner has been clear that they do not go far enough. Even at £380 a year, bus travel remains unaffordable for many families, and those over the age of twenty-one still face high costs. For the Commissioner, public transport must be understood as a public good: central to children’s rights, equality of access, and Wales’s commitment to tackling the climate crisis.

The introduction of £1 fares is therefore a significant step forward, achieved in part through the sustained awareness-raising of the Commissioner, and given momentum by the Learner Travel Summit. But the goal remains free public transport for all children and young people, a measure that would deliver transformative benefits for families, improve attendance and inclusion, and support a greener future for Wales.

4.4.5 Responding to ambitions for Wales: Challenger

The AfW consultation highlighted many of the concerns that have shaped the Commissioner’s work as a Challenger, using evidence to hold government and public bodies to account and to drive change where children’s rights are not being realised. Core issues illuminated in the AfW consultation and embedded in the strategic plan as a Challenger include access and affordability of transport, feeling unsafe online, and children and young people concerns about climate change. Care-experienced young people participating in the AfW consultation also spoke about not always feeling safe or listened to and said they wanted more consistent relationships with trusted adults. Professionals identified instability and poor transitions as key issues. The work of the CCfW with care-experienced children has placed their voices at the heart of communications.

Young AfW respondents, particularly those in rural areas, reported that the cost, reliability, and availability of public transport were key constraints that reduced their access to education, play, and social opportunities. Professionals echoed this, and one of their most common suggestions to make life better was improving affordable transport for children and young people in Wales.

Many parents and caregivers also highlighted the importance of providing more free and accessible spaces, activities, and clubs for children and young people, ensuring that all children can participate in enriching experiences regardless of their background or location. Professionals echoed these concerns in the AfW consultation, recommending the expansion of community-based support, particularly in rural areas, to create equitable opportunities for engagement, learning, and social development.

While the Commissioner has made notable progress on improving access to transport, further action is still needed to address these wider concerns raised during the AfW consultation, to ensure that children and young people have opportunities to participate in affordable, accessible social activities regardless of where they live. This also appears to be an area that few other organisations are currently addressing. Whilst in the past other organisations such as Children in Wales and Sports Wales have called for free and accessible activities for children and young people in Wales, they have not actively been advocating for this during 2023-2025. The Welsh Youth Parliament's My School Day report (2023) references the WG's Additional Enrichment Sessions Trial (which ended in 2021/22, with an evaluation published in 2023) and calls for free-at-point-of-access enrichment activities within the standard school day, without extending hours. Few organisations appear to have taken up the issue of an expansion of the Additional Enrichment Sessions Trial as a major advocacy platform, suggesting a potential opportunity for the Commissioner's office or partners to lead on this issue in Wales.

Online safety and digital wellbeing were frequent concerns raised by both children and adults in the AfW. Children and young people spoke about exposure to harmful content, bullying, and feeling pressured or unsafe online, and expressed the desire to feel safe online and have better information about how to protect themselves. The CCfW has worked to address these issues through engagement with Ofcom.

Climate change featured as a strong theme for older children and young people in the AfW consultation, associated with feelings of anxiety, perceptions of unfairness, and lack of voice in political decisions. The CCfW has amplified the concerns of children and young people through engagement with schools, youth parliaments, and policymakers, emphasising that environmental action is also a children's rights issue relating to the right to a healthy environment and to participation in shaping the future. There is further scope for the Commissioner to expand Challenger work in this area, ensuring that sustainability and climate education are prioritised and that children's voices are central to national environmental policy, while recognising that these issues are well-represented by other organisations in Wales.

For example,

- Youth Climate Ambassadors for Wales (YCA) - fully youth-led (13-25). YCA organise policy asks and campaigns, meet decision-makers, and have published a Climate & Nature Manifesto for Wales. Supported by Size of Wales/WCIA/Climate Cymru
- Teach the Future Wales – youth-led campaign (part of SOS-UK) pushing for climate education reform in Wales (curriculum, teacher training, estate decarbonisation).
- Friends of the Earth Cymru / Young Friends of the Earth – supports youth climate justice activists in Wales with training, funding and platforms to influence policy debates.

However, research from Swansea University and Keep Wales Tidy has revealed that children with ALN and those in alternative provision settings in Wales are being left behind in climate and sustainability education. Despite Wales's high overall participation in the Eco-Schools Programme (over 90 % of schools), the study found a lack of tailored resources, limited staff training and peer networks, and isolation of educators in ALN settings. This gap risks excluding these children from climate-action education, participation rights, and meaningful engagement in shaping future decisions. To mitigate this, a reinforced commitment to inclusive policy implementation and the allocation of targeted resources for ALN settings are required to ensure all children, irrespective of learning needs or context, are enabled and empowered to participate.

4.4.6 Gaps and challenges

The CCfW's ability to act as a Challenger remains critical, particularly in areas where government commitments have not translated into specific, measurable targets. The Welsh Government's Child Poverty Strategy is one such example. Without clear benchmarks, it is important that the CCfW continues to press for accountability and monitor delivery against promises.

One area of focus is the "cost of the school day," where significant barriers remain for families. Focusing on affordable uniforms, meals, trips, and digital access would directly support children's right to education and reduce inequalities. There is also value in championing schemes that are already delivering positive outcomes, such as those supported through the Youth Support Grant (£11.4m in 2025–26), which has been linked to improved school attendance. Similarly, initiatives like Big Bocs Bwyd and Food and Fun provide practical support that could be further promoted. Additionally, monitoring and reporting on the impact of specific schemes highlighted in the child poverty strategy, such as the pilot programme for Basic Income for Care Leavers, would help ensure that effective interventions are identified and scaled.

School transport is another pressing area where the Commissioner's role as Challenger is particularly critical. Persistent inconsistencies, such as thresholds for eligibility, rural inequities, and discretionary decision-making, continue to create postcode lotteries for young learners. The CCfW has constantly championed free learner travel, and perhaps some alternative approaches should be considered, such as:

- Exploring costing of options, such as subsidised bus passes versus dedicated school bus provision.
- Monitoring local provision and changes in School Transport Policies and working with stakeholders to ensure the connection between learner travel as a child rights issue is made. For example, pupils in Rhondda Cynon Taf who live two to three miles from their secondary school have lost free bus provision following budget cuts in 2025, in a local authority already experiencing the second-highest absence rates in Wales. Despite this, a 2024 Attendance and Barriers to Engagement Report for Rhondda Cynon Taf County Borough Council's Education and Inclusion Scrutiny Committee did not mention travel as a factor affecting attendance, suggesting an important gap in analysis. Similarly, a current 2025 consultation in Caerphilly on reducing school transport to the statutory minimum highlights the ongoing risk of inequitable provision.

A further challenge is monitoring the impact of the CCfW's own recommendations, which are compiled in a register (although this does not include consultation calls and policy positions) but not systematically and comprehensively monitored over time. Given the scale and range of recommendations issued across spotlight reports, policy positions, and consultation responses, establishing a systematic mechanism for monitoring progress would strengthen accountability and provide a clearer picture of how influence is being exercised and contributing to meaningful change over time.

These examples point to the importance of the CCfW's role as Challenger to ensure that policies deliver meaningful reductions in poverty and barriers to education. By drawing attention to gaps, evidencing impacts, and highlighting successful schemes, the CCfW can maintain pressure on decision-makers and advocate for approaches that uphold children's rights in practice.

05

LEARNING FOR THE FUTURE

As the outcomes of the Commissioner’s work continue to mature, the past strategic period offers valuable lessons about how transformation takes root and thrives within the children’s rights sector in Wales.

The outcomes achieved across the four commitments demonstrate that real and lasting change emerges not from single interventions, but from the steady cultivation of relationships, evidence, communications, awareness-raising, and trust. Drawing together the diverse and powerful threads of the Commissioner’s work, five overarching insights illuminate how change is cultivated, and how these insights can guide the next cycle of growth.

Change relies on much more than isolated actions.

Across every area of work, from child poverty and education to mental health and safeguarding, progress has depended on the interplay between strong governance, sustained awareness-raising, relationships and stakeholder networks, and authentic participation by children and young people.

What this tells us: Change in our system grows when relationships, evidence, and participation reinforce one another, when we tend to the whole system rather than isolating its elements.

Realising children’s rights means reaching every child, not only most children.

The CCfW’s work has strengthened awareness of children’s rights across Wales, yet persistent inequalities in access and outcomes remind us that some children remain on the margins. To truly realise rights for all children and young people, progress must reach across postcode boundaries, languages, identities, and experiences. Embedding rights must therefore entail addressing structural inequities and ensuring that no group remains unseen or underserved.

What this tells us: Change in our system is authentic only when it is equitable; when every child, everywhere in Wales, can see and feel their rights in action.

Amplifying children’s voices creates momentum and legitimacy for reform.

From Monthly Matters shaping Senedd debates to young people influencing statutory guidance on housing, racism, and climate change, the CCfW’s work demonstrates that centring the lived experiences of children and young people lends awareness-raising and communications both moral authority and political traction. When children’s perspectives inform the design, delivery, and evaluation of policy, decisions gain legitimacy and resonance.

What this tells us: Lasting change happens when children are not just consulted, but meaningfully participate and are recognised as co-creators of solutions.

Collaboration multiplies impact and creates coherence across systems.

Partnerships with more than 150 organisations, joint initiatives such as the Child Poverty Summit, and the diffusion of the No Wrong Door principle across multiple sectors demonstrate how shared frameworks and collaborative efforts can accelerate progress and embed outcomes. When ideas and practices transcend sectors, they build momentum, contributing to cohesive, resilient, and systemic transformations.

What this tells us: Systemic change is most powerful when ideas cross-pollinate and stakeholders align around shared values, language, and frameworks that bridge sectors, levels, and disciplines to create unified, enduring impact.

Sustained challenge and persistence turn awareness-raising into embedded reform.

The achievements around ending profit in children's care, reforming learner travel, and strengthening safeguarding demonstrate that systemic reform often requires long-term commitment and constructive challenge. Progress is nurtured through persistence, partnership, and strategic use of evidence over time.

What this tells us: Change takes time, and persistence matters. Transformation changes does not emerge through a single intervention, but through consistent tending, revisiting, and holding systems to account.

Together, these insights highlight that meaningful change is both cultivated and continuous. It grows best in conditions of inclusion, collaboration, and persistence where rights are lived, voices are heard, and the system itself evolves.

06

CONCLUSION

Over the past strategic period, the CCfW and her team have made measurable progress in advancing the rights and wellbeing of children and young people across Wales.

Guided by the four strategic commitments, being Here for All Children, a Rights Realiser, a Truth Teller, and a Challenger, the Commissioner's work has systematically nurtured change, from raising awareness of emerging issues to cultivating practices, partnerships, and systems that generate lasting, systemic impact. These efforts are interconnected: foundational systems and governance structures, resources, networks, and awareness-raising, and direct engagement with children ensures the voices of children and young people continue to shape outcomes. Across schools, public services, and policy landscapes, the work of the CCfW has contributed to tangible impacts for individual children and families and sustained systemic change, demonstrating the importance of a holistic, child-centred approach to awareness-raising and rights realisation.

The Commissioner's vision and commitments have provided a strong foundation for progress over this strategic period. By systematically integrating the priorities identified by children and young people, the office has strengthened the links between their lived experiences, policy influence, and practical action. Through accessible engagement, rights education, awareness-raising, and challenge, the CCfW has cultivated a responsive and resilient system; amplifying voices, promoting inclusion, and driving improvements across education, equality, poverty, and mental health. This integrated approach demonstrates the effectiveness of aligning strategic commitments with the issues that matter most to children and young people, ensuring that systemic and individual outcomes are both realised and sustained.

Through the Here for All Children commitment, the Commissioner's work demonstrates how strategic partnerships, robust evidence, and active youth participation combine to create systemic and individual impact. Strengthened collaboration across the sector has amplified key issues, while improved internal systems and targeted engagement have ensured that children's voices are central to awareness-raising and decision-making.

In the role of Rights Realiser, the Commissioner's commitment demonstrates how sustained engagement, training, and guidance can translate policy into practice and nurture both individual and systemic outcomes. Schools, local authorities, and health boards are being supported to embed rights-based approaches, creating early shoots of practice, while frameworks such as The Right Way strengthen public services to sustain long-term change. These combined efforts show that empowering children with knowledge of their rights and enabling institutions to uphold them produces resilient foundations for children's wellbeing and rights realisation across Wales.

The Commissioner's work as a Truth Teller demonstrates the power of listening, amplifying, and acting on children's voices to drive systemic and individual impact. Through evidence-based awareness-raising, engagement with public bodies, media outreach, and participation in initiatives such as the Covid-19 Inquiry, No Wrong Door, and the ALN Act, CCfW has

influenced statutory guidance, improved services, and raised public awareness. These efforts illustrate the interconnection between lived experience, policy influence, and meaningful outcomes across Wales.

The Commissioner's Challenger role demonstrates the critical impact of holding systems to account and pressing for meaningful reform. Through sustained awareness-raising on issues ranging from learner travel and care reforms to online safety, housing, and climate action, CCfW has influenced policy, statutory guidance, and service delivery. These interventions strengthen the overall ecosystem, addressing structural barriers and ensuring that children's rights are realised across multiple domains. Challenging poor practice and advocating for reform strengthens systemic effectiveness, ensuring that children's rights, wellbeing, and opportunities are protected and supported over the long term.

The integration of Ambitions for Wales evidence across this report demonstrates how the voices of children and young people continue to shape the Commissioner's priorities. The findings reaffirm that while significant progress has been made in embedding rights and amplifying children's voices, addressing inequalities in whose voices are heard must remain at the forefront of all the CCfW's work particularly for children from lower-income families, disabled children, and those with protected characteristics. Moving forward, the Commissioner's focus should include closing gaps in participation and access that children and young people from lower-income families, disabled children, and those with protected characteristics reported through targeted engagement in disadvantaged communities and ensuring that national reforms such as the Child Poverty Strategy, ALN implementation, and climate education are delivered equitably. The Commissioner's role will continue to be to challenge Wales to make equality of experience the measure of progress. By continuing to listen to children, amplify their voices, and work alongside partners to translate evidence into action

While the Commissioner's office has made significant progress in collecting and using evidence to inform policy and awareness-raising efforts, the current internal system remains fragmented, with data dispersed across multiple sources. This lack of integration limits the ability to identify trends and fully leverage the insights captured from children and young people across teams and thematic areas. Establishing a more joined-up, centralised approach to evidence and a navigable repository for internal data would strengthen the office's capacity to monitor outcomes and impact, and drive more strategic, evidence-informed decision-making, ensuring that every insight from children and young people contributes to systemic improvements and tangible outcomes.

In addition, engagement with underrepresented groups could be deepened, and existing initiatives could benefit from a more consistent application of equality and inclusion principles. Variation in local provision of key services, such as mental health support, school transport, and ALN provision, continues to create inequities, and the impact of some recommendations remains difficult to track without a comprehensive monitoring system. Strengthening both the evidence base and mechanisms for accountability will be critical for ensuring that the Commissioner's awareness-raising continues to be responsive, inclusive, and capable of producing meaningful, long-term outcomes for all children in Wales.

Throughout the past strategic period, the Commissioner's office has made significant strides in advancing children's rights and wellbeing across Wales. Through strategic awareness-raising, robust engagement with children and young people, and close collaboration with public services and sector partners, the CCfW has strengthened systems, amplified children's voices, and delivered tangible improvements in policy, practice, and everyday experiences. Building on these achievements, the office is well positioned to continue driving systemic change, ensuring that all children, regardless of background or circumstance, benefit from stronger protections, equitable opportunities, and meaningful participation in decisions that affect their lives.

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