



NSPCC 
Dim mwy o greulondeb i blant. DIM.
Cruelty to children must stop. FULL STOP.

NSPCC CYMRU/WALES RESPONSE TO:

THE WELSH ASSEMBLY GOVERNMENT'S CONSULTATION ON THE CHILD POVERTY STRATEGY FOR WALES AND ITS DELIVERY PLAN

NSPCC Cymru/Wales
Diane Englehardt House
Treglown Court
Dowlais Road
Cardiff
CF24 5LQ
Tel: 0844 892 0290
Email: Cecile.Gwilym@nspcc.org.uk

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1 Introduction and overview

- 1.1 The NSPCC aims to end cruelty to children in the UK over future generations. In pursuit of our vision, we will:
- Create and deliver services for children which are innovative, distinctive and demonstrate how to enhance child protection most effectively.
 - Provide advice and support to ensure that every child is listened to and protected.
 - Provide advice and support for adults and professionals concerned about a child and if necessary take action to protect the child.
 - Work with organisations which work with children to ensure they effectively protect children and challenge those who do not.
 - Campaign for changes to legislation, policy and practice to ensure they best protect children.
 - Persuade everyone to take personal responsibility for preventing cruelty to children.
 - Inform and educate the public to change behaviours and attitudes to protect children.
- 1.2 NSPCC Cymru/Wales is a member of the End Child Poverty Network.
- 1.3 NSPCC Cymru/Wales welcomes the opportunity to respond to the Welsh Assembly Government's consultation on the Child Poverty Strategy for Wales and its Delivery Plan and acknowledges the Government's real commitment to tackle levels of child poverty in Wales.
- 1.4 We are however concerned that the One Wales commitment to eradicate child poverty by 2020, which we welcome, has been diluted in the consultation document, which refers to the Strategy as a "*vision for reducing child poverty by 2020.*" We believe that the Welsh Assembly Government should remain committed to the goal of eradicating child poverty by 2020.
- 1.5 Our view is that poverty is not limited to economic and material deprivation, but affects all aspects of a child's life. Poverty is about social exclusion, and inequality of opportunity. This deprives children living in poverty of the life chances all children have a right to expect.

There is a known association between poverty and some forms of maltreatment and research shows that children living in poverty are at a greater risk of neglect, maltreatment and abuse.

- 1.6 Therefore, we feel that the Strategy and its Delivery Plan do not acknowledge the relationship between poverty and child abuse, and the fact that tackling one will have a positive effect on the other. This needs to be addressed.

2. Question 1: What are your views on our three strategic objectives for our new Child Poverty Strategy for Wales?

- 2.1 NSPCC Cymru/Wales supports the Welsh Assembly Government's vision for 2020 of a Wales where no child is disadvantaged by child poverty. The three strategic objectives identified by the Child Poverty Strategy are:
- Reduce the number of families living in workless households.
 - Improve the skill level of parents and young people in low income families so that they can secure well paid employment.
 - Reduce the inequalities that exist in the health, education and economic outcomes for children living in poverty by improving the outcomes of the poorest.
- 2.2 NSPCC Cymru/Wales supports the three strategic objectives, and agrees with the view that ending child poverty means tackling the problem of long term economic inactivity. However, we are of the opinion that focusing the Strategy on economic issues undermines its long term effectiveness. Poverty affects all aspects of children's lives and any work done on reducing inequalities should also take into account issues such as child protection and safeguarding. We consider that it is not possible to eradicate child cruelty without addressing the issue of child poverty.
- 2.3 Poverty itself does not cause maltreatment, and children living in poverty are not systematically abused. However, they live in circumstances which make them at increased risk of adverse experiences and negative outcomes. A paper produced by the NSPCC in 2008 outlines research results showing that *"children who grow up in poverty can be more vulnerable to some form of maltreatment, particularly neglect and physical abuse."*¹
- 2.4 The results of both prevalence and incidence studies point towards a correlation between child poverty and some forms of maltreatment. In 2000, responses to the NSPCC's Child Maltreatment in the Family study indicated an association between socio-economic status, financial problems in the family and child maltreatment. A number of incidence studies (Baldwin & Carruthers, 1993&1998; Tuck, 1995) carried out in England also show a link between deprivation and a higher number of children on the child protection register.
- 2.5 A study of child abuse trends in England and Wales (Creighton, 1992) looked at the characteristics of parents of children who were physically abused and found that they tended to be younger and with a lower

¹ NSPCC Child Protection Research Briefing, "Poverty and Child Maltreatment", April 2008

socio-economic status. There is also a strong correlation between poverty and neglect (Tuck, 2000): 98% of the families whose children were at risk of emotional maltreatment or neglect were characterised by the extreme poverty of their material environment.

- 2.6 The most widely accepted explanation for the correlation between poverty and maltreatment focuses on stress, which we know increases the risks of parenting difficulties. A study conducted in 2007 by the NSPCC and the University of York in partnership with the Frank Buttle Trust found that stress is likely to be significant in the increased risk of some forms of maltreatment among parents living in poverty.²
- 2.7 In relation to the first strategic objective which aims to reduce the number of families living in workless households, NSPCC Cymru/Wales considers that improving employment opportunities for parents who are in a position to access employment is important. Parents who have been out of the job market for a while may need additional support and incentives to help them secure employment. However, NSPCC Cymru/Wales wishes to stress that parents and carers should not be forced into employment if they do not have the support in place to do so or access to decent and affordable childcare. This may lead parents being forced to rely on inadequate childcare or to leave children at home alone before they are emotionally or practically able to cope, with serious consequences for the safeguarding and wellbeing of children.
- 2.8 NSPCC Cymru/Wales is broadly supportive of the strategic objectives outlined in the Child Poverty Strategy, but feels that child protection and safeguarding issues need to be included. Our view is also that tackling economic inactivity should not be done at the expense of children's wellbeing and safety.

² http://www.nspcc.org.uk/Inform/research/findings/livingwithhardship_wda52842.html

3. Question 2: What are your views on the policy action we set out in the Delivery Plan?

- 3.1 NSPCC Cymru/Wales welcomes the policy commitments made by the Welsh Assembly Government in order to meet its 2020 target of no child being disadvantaged by poverty in Wales. We feel it is right that the Child Poverty Strategy should seek to deliver the 13 broad aims of the Children and Families Measure. However, we are of the view that the Delivery Plan should be strengthened in a number of areas.
- 3.2 In Chapter 2, Core Aim 7, relating to income poverty, the section on childcare needs to be expanded. NSPCC Cymru/Wales agrees that childcare provision is key to the ability of parents to go back to work. The gap between adequate supply and demand should be addressed urgently, particularly for children above pre-school age and of secondary age, and for children during school holidays. However, we would wish the Delivery Plan to make the link between appropriate childcare and child protection and safeguarding issues.
- 3.3 Chapter 3, Core Aim 1, every child should have a flying start in life, sits under the broad aim of supporting parenting. In order to do this, the Delivery Plan outlines a more integrated approach to family support policy, placing the family at the centre: *“this will involve developing a holistic model that will integrate the interventions with families and look to provide help to those families that need it most.”* (Delivery Plan, Chapter 3, p13). NSPCC Cymru/Wales is concerned that the needs of the child as a member of the family will be lost in the new approach. It is important to remember that while children are members of family units, they also have specific needs in their own right. The family setting may not always be the best one for a child's safety and welfare, and we would hope that the Delivery Plan can recognise and address those issues.
- 3.4 This chapter also outlines provisions for parenting support which includes Integrated Family Support Service (IFSS), Flying Start, Integrated Children's Centres and Community Focused Schools. While NSPCC Cymru/Wales welcomes these programmes, there is a danger of a lack of co-ordination locally and parents not receiving the support they need because they do not live in a Flying Start area or have complex needs. Co-ordination, integration and development of both universal and targeted parenting support services is essential and we believe this has been most effective when it has been a priority of Children and Young People's Partnerships, where they have developed Parenting Strategies and also employed Parenting Co-ordinators. We also call on the Welsh Assembly Government to

develop a National Parenting Strategy to set the policy direction for the work done locally.

- 3.5 Chapter 5 states that children and young people in Wales should enjoy the best possible physical, mental, social and emotional health and be free from abuse, victimisation and exploitation. However, each of the headings sitting under this general title make reference to health issues, such as nutrition and exercise and once again there is no reference to child protection and tackling abuse. Children who are abused have considerably poorer outcomes than others, which makes them more vulnerable to poverty in later life. Safeguarding children therefore contributes to lifting them out of poverty. NSPCC Cymru/Wales would wish the Delivery Plan to include policy commitments to tackle child abuse as a way to fight child poverty. Issues around child sexual exploitation and child trafficking should also be considered.
- 3.6 We are pleased that the Delivery Plan includes looked after children and care leavers in Chapter 9 on vulnerable families and children. However, we feel that the section once again leaves out issues of abuse and neglect, which are central to the experiences of a large number of children entering the care system. Statistics on adoptions, outcomes and placements for children looked after by local authorities for the year ending 31st March 2009 show that the largest category of need for children starting to be looked after was “abuse or neglect” at 54% of the total.³ Support and counselling is crucial to overcoming the abuse and neglect these children have experienced, and NSPCC Cymru/Wales calls on the Welsh Assembly Government to increase the provision of therapeutic services across Wales.
- 3.7 We urge the Welsh Assembly Government to strengthen its proposed action to address the specific needs of care leavers. Unfortunately, schemes like the Child Trust Fund have been discontinued by the UK Government, so the Delivery Plan should be updated to reflect this.
- 3.8 The chapter on vulnerable children and families does not make reference to domestic abuse. The co-occurrence of child abuse and neglect and domestic violence is well documented (Widom & White, 1997; Widom 1989). Most children are aware of the abuse of their parent with up to 86% either in the same or adjoining rooms during an incident of domestic violence (York, 2006). Witnessing incidents of domestic violence causes fear and distress in children and recognition of this is reflected in how it was incorporated into the definition of harm

³<http://wales.gov.uk/topics/statistics/headlines/population2010/100624/?lang=en>

in the Children Act 1989. Children may often continue to witness post-separation violence during child contact visits (York, 2006). Risk factors of child abuse and neglect include parental depression, maternal alcohol consumption and history of family violence. Additionally, income is significantly related to violence toward children in single parent families (Berger, 2005). Abuse men may prohibit women from seeking employment as a means of limiting their access to the “outside world” and therefore continuing to exert power and control over them. This may mean that many families where domestic abuse occurs are one-income and no-income families. Similarly, women who are financially dependent on their abusive partners may be less likely to leave, especially if they have children whom they will need to support. Women who have no access to public funds because of their immigration status are even more at risk of experiencing severe poverty if they leave their abusive partners.

4 Question 3: Do you think the policy action set out in the Delivery plan will enable us to achieve our three strategic objectives and our vision for 2020?

NSPCC Cymru/ Wales feels that integrated and co-ordinated action will go some way to achieving the vision and objectives in 2020. However the current economic situation, imminent public sector cuts and job losses will hinder progress. It is essential that more is done to create jobs and we would recommend that the economic development and regeneration agencies, both nationally and locally, are engaged and more heavily involved in delivering this strategy.

5 Question 4: What is the best way to integrate multi-agency support for families living in poverty?

NSPCC Cymru/Wales believes that integrating services to deliver at a local community level is crucial if the Child Poverty Strategy's Vision and objectives are to be achieved. The local delivery model has to be multi agency and services need to be easily accessible in every community across Wales. All agencies will need to agree Information Sharing Protocols to ensure safe sharing of personal information and a personalised response to children and families. NSPCC Cymru/ Wales also calls on the Welsh Assembly Government to ensure that the members of staff/ volunteers in all services receive appropriate child protection training in order to be able to identify issues of concern within a family at an early stage, and are aware of processes to follow to bring these concerns to the attention of the relevant services.