



**Response to Welsh Government Consultation on the
'Revised Child Poverty Strategy for Wales'**

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MAE POB PLENTYNDOD WERTH BRWYDRO DROS EVERY CHILDHOOD IS WORTH FIGHTING FOR

About the NSPCC

We're leading the fight against child abuse in the UK and Channel Islands. We help children who've been abused to rebuild their lives, we protect children at risk, and we find the best ways of preventing child abuse from ever happening.

Abuse ruins childhood, but it can be prevented. That's why we're here. That's what drives all our work, and that's why – as long as there's abuse – we will fight for every childhood.

We help children rebuild their lives, and we find ways to prevent abuse from ruining any more. So when a child needs a helping hand, we'll be there. When parents are finding it tough, we'll help. When laws need to change, or governments need to do more, we won't give up until things improve. Abuse changes childhood. But so can we.

Introduction

NSPCC Cymru/Wales welcomes the opportunity to respond to this consultation on the revised Child Poverty Strategy for Wales. We are members of the End Child Poverty Coalition Cymru steering group and we support their positions set out as part of the consultation process.

Our response focuses on our belief that tackling child poverty is a key part of ensuring each and every child has the best start in life. Our response draws on our policy priorities and programmes to underline that we need effective early interventions to help families thrive and this needs to be a central plank to the Revised Child Poverty Strategy.

1. Do you agree with our proposal to maintain our ambition to eradicate child poverty by 2020?

YES.

- 1.1. NSPCC Cymru/Wales welcomes the Welsh Government's repeated commitment to ending child poverty by 2020. This pledge to eradicate child poverty, enshrined in the 2010 UK Child Poverty Act, must remain in place to help focus all levels of Government on the promise made to all children and young people. We also believe that the target should now be used as a mechanism for self- reflection to analyse the reasons more progress has not been made and what further action needs to be taken to reduce child poverty levels.
- 1.2. The forecast is bleak and progress has stalled in recent years. The Institute for Fiscal Studies projects increases of 900,000 and 1.4 million children living in poverty in the UK by 2020 on the relative and absolute measuresⁱ. While there were significant gains in the first part of the new millennium, half of those gains have been lost since 2005 and child poverty in Wales is rising.ⁱⁱ Latest figures for Wales put child poverty levels at 200,000 or 31% of children. This is the highest level of an UK nation. Based on current figures, to meet the Welsh Government's target, current levels would have to fall 4 times as fast in the next decade as they did in the last.ⁱⁱⁱ The scale of the problem underlines the urgent need, now more than ever, for us to scale up our ambition on ending child poverty.
- 1.3. Changes to the Welfare Benefit System being implemented by the UK Government, pose a serious threat to the vision of eradicating child poverty in Wales. We recognise that many of the levers to impact on family incomes rest with the UK Government. However these constraints make it even more crucial that Welsh Government harness every lever within their competency to take action to reduce child poverty and mitigate its effects.
- 1.4. Retaining the 2020 target provides a vital focus, ensuring accountability and a reminder of how much progress is still needed. It sends a strong message of Wales' belief that child poverty is unacceptable. It represents the ambition that every single child in Wales should have the start they need in life. It is also important to consider what message it would send about our ambition for children if Wales were to step away from the target, while it remains in place across the other nations of the UK.
- 1.5. The target provides a fulcrum around which to build a much-needed holistic approach ensuring that all levels of Government in Wales maintain a resolute focus on child poverty as a central plank of the wider tackling poverty agenda. It is a benchmark to ensure that all partners in Wales redouble their efforts and do everything in their power to eradicate child poverty in Wales.

2. Do you agree with our proposal to continue with our existing three strategic objectives for tackling child poverty?

YES but subject to further development.

2.1 NSPCC Cymru/Wales believes the Welsh Government is taking the right approach by focusing on the policy levers that it has responsibility for and where it is able to make the most difference. However we would echo the ECPN position that these objectives need to be updated to reflect the changing characteristics of child poverty and we support detailed comments about the first two objectives made as part of their response.

2.2 The core issue NSPCC Cymru/Wales would raise is that the objectives are currently missing any longer-term view of the role of prevention and early action to tackling child poverty. While the first two objectives on addressing worklessness and building skills/in-work poverty are ostensibly short-term, we believe the third objective needs to take a longer-term view. The ‘here and now’ approach set out in the consultation document (p.1) should not detract from keeping a focus on a cross-governmental, longer-term commitment to early intervention to achieve the best outcomes for babies born today.

2.3 We would suggest that the third ‘reducing inequalities’ objective, needs to be reframed to address the specific inequalities experienced by the poorest in our communities and the impact that these can have on children and parents/carer’s ability to care for their children. It is our view that taking a parental support approach could contribute to strengthening the revised Child Poverty Strategy. While we welcome flagship initiatives such as Flying Start, those services are only available to a proportion of the population. We would urge the need for development of a stronger focus on ensuring that children’s needs are met by their parents/carer’s outside Flying Start areas.

2.4 We know that significant deprivation, not just financial, is extremely harmful in the earliest years of life and can have a significant impact on children’s outcomes^{iv}. NSPCC’s ‘How Safe’ Report (2013) identifies a series of factors commonly associated with a range of negative outcomes for children, including child abuse and neglect (Fig. 1). It shows a complex link and interaction between poverty and debt with issues such as the ‘toxic trio’ of substance misuse, domestic violence and mental health, factors which are all associated with negatively impacting on outcomes for children.^v



2.5 The relationship between poverty and child maltreatment, specifically child neglect is complex and remains an under-researched area. However a range of research finds that stress from factors associated with poverty – and the interaction of these factors- increases the risk of parenting difficulties and can have a ‘disabling effect’ on parenting capabilities.^{vi}

2.6 Child development is a dynamic process – through which a child is transformed from reacting to sensations and being dependent on carers to becoming independent and making sense of the world. The process does not simply unfold with neurological maturation but is shaped- positively or negatively- by the interactions between biological and environmental influences. Babies, children and young people have many needs including:

- Basic care (appropriate food, clothes, shelter and personal hygiene, medical care)
- Ensuring they are supervised and kept safe
- Love and emotional warmth
- Stimulation
- Guidance and Boundaries
- Stability

2.7. Meeting these needs is crucial for optimal child development and failure to meet some or many of these needs, whether consistently or intermittently, is child neglect. Neglect is defined as “*the failure to meet a person’s basic physical, emotional, social or psychological needs, likely to result in the impairment of their health, wellbeing or development*” (Social Services and Wellbeing Act 2014, Section 197). Put simply, neglect is ‘all about the NOTS’. Child neglect covers a spectrum , from mild to severe neglect, but it is these ‘gaps’ in parenting that can risk, particularly in the early years, affecting a child’s brain development leading to a devastating and long lasting effect on a child’s development.

2.8. To prevent this, babies and children need responsive and sensitive parenting. Extensive research^{vii} emphasises the importance of typical “serve and return” interactions that occur between young children and the adults who care for them. Because responsive relationships are both expected and essential, their absence poses a serious threat to a child’s development and wellbeing. If a child is not treated properly in the first two years of life, the genes for various aspects of brain function cannot operate. Sensing threat activates biological stress response systems, and excessive activation of those systems can have toxic effect on developing brain circuitry. Recent research^{viii} reveals how poverty, nutritional deficiencies, and a lack of responsive caregiving and learning opportunities combine to undermine childhood potential, and concludes that *‘Intervention in the First 1000 Days is Vital to Fulfilling Childhood Potential’*. The importance of early action is also emphasised in the Welsh Government’s recently published *‘Parenting in Wales: Guidance on engagement and support’*^{ix}

2.9. We also know that if early action is not taken to prevent neglect and to address its impacts can result in lifelong consequences. A child’s development score at just 22 months can serve as an accurate predictor of educational outcomes at 26 years.^x Moreover, evidence from the Millennium Cohort Study shows that differences in the cognitive ability of relatively advantaged and disadvantaged children are apparent as early as at 9 months old. These differences accelerate from this point and by the age of the 3 when they enter schools in Wales, children from disadvantaged backgrounds are often already a year behind their more privileged classmates.^{xi} For this reason effective interventions are likely to pay significant dividends that span learning, health and parenting of the next generation.

2.10. NSPCC Cymru/Wales therefore believes it is fundamental that the revised Child Poverty’s approach to addressing inequalities take a more strategic approach to neglect and parenting to ensure parents and children get support as early as possible. Intervention within the first 1000 days of life and supporting parents and carers to parent effectively throughout their journey as a parent is crucial if we are to prevent neglect and abuse, to ensure children’s needs are met and all children develop to achieve their full potential. We believe preventing neglect is an important part of the jigsaw to end intergenerational cycles of disadvantage.

2.11. We believe the revised Child Poverty Strategy needs to work in tandem with the approach to intervention in the early years. We would like to see core inequalities such as mental health, substance misuse and domestic abuse clearly addressed in the revised Strategy. We would also like to see support for parents to understand the impacts of ‘not doing’ certain things, to build a stronger sense of agency and to work with parents to build strategies to help them address problems in their parenting approach. We believe all parents should be provided with good quality antenatal education programmes and more vulnerable parents should be provided with targeted and more intensive ante and post-natal support. The following section makes a series of suggestions about how this could be delivered.

3. Are the policies and programmes underpinning our strategic objectives the right ones?

No because as argued above, the next steps outlined are all short term 'here and now' actions. While we believe some short-term actions are appropriate, this needs to be matched by new policies and programmes to provide the sorts of interventions and support we would like to see for parents. This would develop and progress the Welsh Government's longer term approach to ensure the needs of babies and young children are met before they enter nursery/school.

- 3.1. The first point that NSPCC Cymru/Wales would make is that the Revised Child Poverty Strategy needs to result in a **more joined up approach** to child poverty across Welsh Government programmes, initiatives and policies, within the wider Tackling Poverty agenda. Detailed comments are included under Section 4 on the 'collaborative approach'.
- 3.2. Secondly, as set out in Section 2, NSPCC Cymru/Wales would like to see the revised Child Poverty Strategy include a strand that takes a holistic approach to addressing inequalities and issues of neglect through family/parental support. We would suggest this could constitute a perinatal programme like the NSPCC's Innovative Baby Steps programme followed by home learning programme such as SafeCare or Improving Parenting Improving Practice (details of a range of NSPCC Early Years programmes below). NSPCC Cymru/Wales believes that there is potential for this to form an additional approach for families outside of Flying Start areas, we would be pleased to discuss options for piloting such an approach with Welsh Government.
- 3.3. The NSPCC's services aim to improve the outcomes of children and young people who are at risk of or have experienced abuse and neglect, as well as support to their families/carers. Our service centres in Swansea and Cardiff will become Thriving Children Centres in 2015. NSPCC will be rolling out a range of neglect assessment and intervention services which will be available to professionals concerned that a child may be experiencing neglect. Moreover, we already offer a range of services specifically targeting the early years/focused on providing support to parents in their care-giving responsibilities:
 - 3.3.1. **Baby Steps**^{xii} - Our innovative Baby Steps programme is an ante and postnatal education programme that supports those most in need to prepare for parenthood and is run from our Swansea Service Centre. The programme starts with a home visit in the seventh month of pregnancy and then includes six weekly group sessions before the baby is born. After babies are born the family is visited again at home, and then there are 3 more group sessions. Sessions include films, group discussions and creative activities. They're interactive and designed to build confidence and communication skills. The Baby Steps interim evaluation report is due at the end of this year and emerging findings are promising showing that mothers and fathers report decreased anxiety, an improvement in relationship satisfaction and lower rates of adverse birth outcomes compared to the general population. We're working with four 'early adopter' areas in the UK to understand how best to roll out Baby Steps into mainstream health and children's centre services. Based on this, we will develop a package of training and support which will be available to other agencies in 2015
 - 3.3.2. **Coping with Crying**^{xiii} - Looking after a crying baby is hard but for some families it can be very serious. Babies' crying has been linked to stress, depression and relationship problems. In extreme cases, parents may become angry and harm their baby. When babies are shaken, thrown or handled roughly this can result in what's called non-accidental head injuries. It's the leading cause of death and long-term disability for babies who are harmed^{xiv}. Our short film, Coping with Crying, prepares parents for the stress they might feel when their baby cries and help them to cope better. It aims to

prevent non-accidental head injuries and is embedded in discharge processes of the Betsi Cadwaladr and Cwm Taf Health Boards.

3.3.3. **Minding the baby**^{xv} - The first few months of a baby's life have a huge effect on the rest of their childhood. Minding the Baby helps mums to give their babies the best possible start in life. Young, first-time mums are offered support to help them develop a positive relationship and secure bond with their baby. We aim to help mums to recognize and respond to their baby's feelings and needs (also called 'maternal reflective capacities'). A nurse and social worker, or therapist, also give practical support such as feeding tips, help with housing and financial advice. We support mums for two years. Weekly home visits start in the seventh month of pregnancy and continue until a child's first birthday. After that, we'll visit once every two weeks until the baby's second birthday. During visits mums are encouraged to be aware of their baby's physical and mental states to help them respond to their needs. For example, we might ask mum to put into words what they imagine their baby is feeling. Minding the Baby helps mums to understand how best to respond to their baby, how a baby develops as well as giving parenting advice and practical tips.

3.3.4. **Safe Care**^{xvi} - Just as there are many things that can contribute to child neglect, there are many things we can do to prevent it. Being a parent to a young child is a demanding job and it can be even harder when other worries and issues take hold. SafeCare® offers practical support to parents of children aged 5 or under. It aims to help parents to develop parenting skills and focus on the needs of their child. SafeCare® helps parents with 3 main areas: keeping their child fit and healthy; keeping the home safe; having a good relationship with their child and managing their behaviour. Parents are also given support developing problem solving skills. These skills can then be used to manage other situations that are part of family life. We visit a family for 18-20 sessions and provide one to one support in their own home. Together with the parent, we'll agree some goals to aim for. We help them focus on areas that need work and how to achieve their goals. At the end, we'll look back at progress together to work out if and how things have improved.

3.3.5. **Improving Parenting Improving Practice (Pathways Triple P)**^{xvii} - Also known as Pathways Triple P, Positive Parenting Programme is currently run from our Cardiff Service Centre and help parents to: manage stress, anger and mood swings; improve how they communicate with their child; improve their parenting skills (including how to handle challenging behaviour); increase confidence in their parenting. We will visit a family at home and help parents agree some goals to aim for. We'll help parents to reach their goals both during the visits and in the future. Normally, we'll visit a family for 10 weeks but this can be longer if they need extra help. Parents practice what they have learned between sessions.

3.3.6. **Additional** - In addition to services specifically focused on the early years, we also offer a range of services in other areas. These include supporting parents with mental ill-health and substance misuse problems through a development project called the Welsh Neglect project commissioned from the Welsh Government Social Service Directorate. The Welsh Neglect project aims to improve the multi-agency response and services to children whose needs are not being met by their parent/carers. As part of this work indicators associated with neglect are being examined and a tool is being designed to better identify and intervene in instances of neglect. We would urge that, when completed, the indicators included in this tool also be considered for how they

cross-over to the Revised Child Poverty Strategy and the Early Years Outcomes Framework.

3.3.7. All of our services are subject to robust evaluation and are monitored for quality assurance and programme fidelity and as such could help support the delivery of a parent support approach through the Revised Child Poverty Strategy.

4. Are you content with the collaborative approach we set out for tackling child poverty in Wales?

YES. NSPCC Cymru/Wales believes a collaborative approach is vital to tackling child poverty in Wales and would endorse ECPN comments about the need for greater involvement of the private sector as core partners. NSPCC Cymru/Wales makes a series of comments in this section about the elements that we believe to be vital to a collaborative approach.

4.1. Achieving join-up between programmes and policies: The Revised Child Poverty Strategy needs to result in a more joined up approach to child poverty across Welsh Government programmes, initiatives and policies, within the wider Tackling Poverty agenda.

4.1.1. We welcome that the Welsh Government has taken steps to broaden its approach by re-positioning Communities First as an anti-poverty programme with a focus on economic, skills, education and health outcomes. The extension of the Flying Start Programme to double the number of children benefitting through support for families, health visiting and nursery places is also welcome. Welsh Government has also taken important steps through Families First and Intensive Family Support teams to focus action on the early years, early intervention and prevention. We also support the Team Around the Family approach.

4.1.2. However, whilst the evaluations of Flying Start have been positive and shown benefits for many young children in poor households, the visibility of children and young people in the Communities First Programme and the Families First programme varies considerably across the board^{xviii} Moves to introduce a common outcomes framework for Flying Start, Families First and Communities First are welcome and this needs to be strongly linked to any outcomes or indicators developed under the revised Child Poverty Strategy.

4.1.3. Moreover we would underline that there needs to be adequate join up between the Revised Child Poverty Strategy and a raft of new Welsh Government Legislation which will be implemented in coming years. This includes new duties for local needs assessments, collaboration, Safeguarding Boards and a very welcome greater emphasis on prevention under the Social Services and Wellbeing (Wales) Act. The new duty to produce local strategies on Violence Against Women, Domestic Abuse and Sexual Violence under the VAW, DA, SV (Wales) Bill, and the Wellbeing of Future Generations (Wales) Bill. The FG Bill also establishes new strategic boards and wellbeing plans at a local level.

4.1.4. We also welcome the recent consultation on a Welsh Government Early Years Framework (EYOF) as a mechanism for identifying where early years policies and programmes are making a difference. This should help embed a holistic approach to co-ordinate early years work across Government and, reflecting our comments in section 2, needs to align with child poverty approaches. NSPCC Cymru/Wales is also pleased to see that an outcome looking specifically at poverty is included in the EYOF, especially given the strong link between poverty and child welfare.^{xix} We would however reiterate that we believe it important that the EYOF does not encroach on the robust evaluation of individual services and is designed to be sufficiently robust as to differentiate between the impact of services and wider factors.

For example, economic prosperity can have a profound impact on many outcomes and it is important that any outcomes framework can identify and attribute any changes in measured outcomes appropriately. This is a comment that would extend to Question 6 on indicators under the Welsh Government's Revised Child Poverty Strategy.

- 4.1.5. The creation of a Welsh Government Early Years Partnership Board has also been a welcome development and we hope to see this continue to develop.

4.2. Achieving a Child Right's Approach.

- 4.2.1. NSPCC Cymru/Wales believes that any programme of action for tackling child poverty in Wales must be underpinned by the United Nations Convention on the Rights of the Child (UNCRC). NSPCC Cymru/Wales welcomes the section in the consultation document highlighting children's rights particularly noting Government responsibilities under Article 26 and 27 UNCRC. We also welcome the recognition that the Revised Child Poverty Strategy should adhere to the Rights of Children and Young Person's (Wales) Measure and pay due regard to the UNCRC. We welcome the willingness to engage of the children's sector in the development of the Child Right's Impact Assessment for the strategy.
- 4.2.2. However, rather than a separate section on Children's Rights, we believe the UNCRC and all of its articles need to more strongly integrated throughout the Strategy acting as a basis for action and evaluation of effectiveness. We believe 'children's humans rights' need to be the framework underpinning the Strategy.
- 4.2.3. The Children's NGO Sector and the Children's Commissioner have consistently raised concerns at an erosion of a 'child-centred' approach in Welsh policy making in recent years. The Cabinet sub-committee established in 2003 has ceased to exist and there is no longer a Minister or Deputy Minister with sole responsibility for children. Welsh Government is still to implement a consistent and transparent budget process for children and young people. Recent funding decisions also mean that Wales no longer has a national participation structure for children and young people. We believe a child-rights centred approach, fore-fronted at all levels of government and decision-making in Wales, is vital to ensure a strong and sustained attention to children's issues.
- 4.2.4. In recent years, the Tackling Poverty Action Plan (2012) has been used as a mechanism for delivery of the Welsh Government's Child Poverty Strategy. However, the broad family approach of the TPAP represents a move away from the overtly child-rights based approach than was seen in previous Welsh Government Child Poverty Strategies (2005, 2010 and the draft 2010 delivery plan which used the 7 Core Aims, derived from UNCRC, as a framework).
- 4.2.5. We therefore welcome the new more integrated approach of having a specific Child Poverty Strategy to complement the Tackling Poverty Action Plan (TPAP), we hope this will ensure a stronger focus on child poverty throughout the broader TPAP approach. We would also underline that the 'parent support' actions we have suggested throughout this response could hold the potential to bridge the broader 'family poverty approach' and a rights-based child centred approach to child poverty.
- 4.2.6. NSPCC Cymru/Wales remains of the view that a child poverty approach is distinct from a family poverty approach for two key reasons. Firstly taking an explicit child poverty approach puts the child at the centre of all policy measures to combat child poverty, putting all actions through the filter of what is best for the child. The second has its roots in a human rights approach to child poverty based on the concept that those experiencing poverty have rights or entitlements that give rise to *legal obligations*. Moreover, a human rights perspective

acknowledges the child as a social actor in their own right outside of the family unit, as agents in their own lives as well as experts in their own lives.^{xx} They have a right to be listened to and have their expertise help shape policy-making. As Eurochild states: *“Once framed in a child rights context- based on the United Nations Convention on the Rights of the Child (UNCRC) and the existing legal base of the European Union – the distinctiveness of a child poverty approach becomes clear and should drive all policy initiatives to combat child poverty.”*^{xxxi}

- 4.2.7. We believe detailed thought needs also to be given to what a ‘rights-based’ approach to tackling child poverty means in practice and how this will be operationalised. This was previously achieved through the 7 core aims and we believe thought needs to be given to a similar mechanism for summarising and translating the UNCRC articles and outputs from the UN Committee into tangible actions that can be taken across Wales to combat child poverty.
- 4.2.8. The Rights of Children and Young Person’s (2010) Measure requires Welsh Ministers to have ‘due regard’ to the substantive provisions of the UNCRC. The UN Committee’s General Comment 5 on General Measures of Implementation sets out a set of controls and procedures to help ensure adherence to the duty and would aid more holistic implementation of children’s human rights. We welcome the draft CRIA developed under the Strategy but believe this needs to be strengthened. Linked to our comments in Sections 2 and 3 of this response, we would particularly highlight the importance of Articles 5 and 18 of the UNCRC, Governments which outline that states are obliged to provide support to parents to care for their children. We also believe articles governing outcomes for some of the most vulnerable children including LAC and disabled children need specific attention. The CRIA currently picks out articles 26, 27, 3, 13, 12, 18, 28, 29 and 31 as *particularly* relevant. We would argue that the Strategy needs to engage with *each and every* article and this needs to form the criteria for evaluation.
- 4.2.9. We would also underline that thought needs to be given on how to support local authorities and public bodies to better embed the UNCRC in their work. We would suggest that a much more nuanced, technically informed, incremental and progressive approach is needed across the board. This approach would require education and re-education of staff across authorities. Signposting to support available outside the WG will be important, specifically the Wales UNCRC Monitoring Group, the Children’s Commissioner for Wales, the Children’s Rights Observatory at Swansea University that can help distil and advise and how to apply UN Committee positions.

4.3. Engagement with Children and Young People

- 4.3.1. NSPCC Cymru/Wales welcomes the section in the consultation document acknowledging the need for ‘ongoing engagement with children and young people’. We believe that the adoption of ensuring ‘children have an active voice and can participate in the working of government’ as a key theme in the new Children and Families Delivery Grant is also a welcome step.
- 4.3.2. Recent funding decisions about government grants to support children and young people’s participation mean that it remains unclear how Wales will ensure a national and visible mechanism for supporting the participation of young people in decision making.
- 4.3.3. We are concerned that it currently remains unclear how the Child Poverty Strategy will include the ‘voice’ of children and young people. As highlighted above, part of an approach to fulfilling children’s human rights is recognising children as citizens and agents in their own right with their own experiences and expertise of living in poverty. Under Article 12 of the

UNCRC they have a right to participate and have a say in decisions affecting them. We believe there needs to be a mechanism for ongoing engagement, extending beyond the consultation period into the implementation of the Strategy across all levels of Government. Currently, the revised Child Poverty does not provide sufficient information about how this will happen in practice and we would welcome further detail.

4.4. Ensuring a collaborative approach across all levels of Government.

- 4.4.1. NSPCC Cymru/Wales believes that a vital part of the collaborative approach set out by Welsh Government hinges on ensuring shared ownership and responsibility of the child poverty agenda with local government and public bodies. Crucially as set out above, this needs to include engagement at a local level with children and young people.
- 4.4.2. It is important to recognise that funding provided through Government ‘programmes’ represent a small proportion of the funding that goes to public services to support children and families at a local level. In the face of unprecedented cuts to local government funding in Wales, a major challenge is to ensure mainstream policies and strategies are coherent and joined up. It is also vital to ensure that they remain focused on addressing the issue of child poverty despite the need to make difficult decisions to cut budgets and make savings. We are concerned that recent changes mean that local authorities are not receiving clear direction about spend on children and the importance of investing in children and young people. We are already seeing that early intervention services are some of the first to be cut in many local authority areas.
- 4.4.3. Local authorities have local tackling poverty champions in place at both officer and elected member level but their remit and responsibilities are unclear. There needs to be more work on ensuring they provide direction and leadership and hold authorities to account on their approach to children and young people.
- 4.4.4. From April 2013, local authorities and partners are required to work to a Single Integrated Plan (SIP) for their area. A SIP replaces at least four of the existing statutory plans including the Children and Young People’s Plan. SIPs are also now the main instrument used by local authorities and partners to discharge their statutory child poverty under the Children and Families (Wales) Measure 2010.
- 4.4.5. NSPCC Cymru/Wales would express concern that children are getting lost in the SIP approach. NSPCC Cymru/ Wales reviewed the content of the twenty two SIPS in 2014 and found that the Local Safeguarding Children Boards were only mentioned in half of the SIPs and detail about how Local Service Boards worked with LSCBs, or the link between them was mentioned in none. We also found that the focus on children and young people and vulnerable children and young people was variable. The Children’s Commissioner for Wales makes similar findings on child poverty.^{xxii}
- 4.4.6. The Wellbeing of Future Generations (Wales) Bill will take this simplified approach further with the introduction of local wellbeing plans and new Public Service Boards. Our response to NAFW Sustainability Committee’s Stage One inquiry on the FG Bill raised our concerns about the lack of focus on children and young people and child poverty in the Bill (as introduced). We are also concerned that the FG Bill proposes to repeal Section 26 of the Children Act 2004, the requirement for Children and Young People’s Plans. These plans have brought together organisations to jointly plan, co-ordinate, deliver and sometimes result in co-location of services for children and families which has benefited children and families and ensured a reduction of duplication. The requirement to produce Children and Young People’s Plans, or discharge that duty through the SIPs, has helped keep a focus on services

to support vulnerable children and young people in each local area. We have similar concerns about proposed changes to the duty under the Children and Families (Wales) Measure for each local authority to produce a child poverty strategy.

- 4.4.7. NSPCC Cymru/Wales would express concerns at the potential loss of structures to have a local strategy under a public duty, scrutinised by the Welsh Government. We are concerned this could erode a focus on children and could risk undermining the partnership role that local government needs to play in the ‘collaborative’ approach to working to eradicate child poverty in Wales.

5. Do you agree with the proposals we have set out under next steps?

No because of the need for a longer-term approach and the development of actions under the third objective.

- 5.1. NSPCC Cymru/Wales believes that identifying five key priorities for the Revised Child Poverty Strategy is a sensible though short-term approach. We endorse specific comments on these areas made as part of ECPN Cymru as part of the consultation process.

5.2. Family and parenting support – the missing link?

- 5.2.1. NSPCC Cymru/Wales has made clear throughout this response that we believe parenting is a significant omission from the priorities identified for the Revised Child Poverty Strategy. We believe there is considerable scope to explore how an approach to supporting parents could form an integral part of making further inroads into reducing the impact of poverty on children’s outcomes.
- 5.2.2. We welcome the statement on page 7 of the consultation document that *“A consideration of children and investing in the early years should be central to the development of policies and programmes across Government.”* We also welcome the statement that *“Supporting parents to provide a home environment where children and young people are able to learn and thrive is fundamental.”*
- 5.2.3. Prioritising actions on parenting offer a focused approach to reducing the impact of inequalities on families and children. As we have highlighted, parental stress and consistency are the two variables most associated with child outcomes and that the negative effects of low income can be mediated by positive parenting factors. Support, information, preventative action and a network of parenting and relationship support can be crucial in helping families to cope. A coordinated approach to action to support parenting could help families to escape the cycle of poverty. It is also vital to ensure children and families are able to access targeted support earlier. The Revised Child Poverty Strategy provides the opportunity to embed a joint working approach where agencies work together to deliver a spectrum of preventative services through fully integrated multi-agency working. Local authorities and local health boards must have a shared focus on robust early assessment of the health and emotional well-being of children and young people and needs of parents/guardians to ensure they receive the support they need, at the point that they need it.

6. Do you agree with the indicators we propose to use to measure progress?

- 6.1. We welcome the approach of the Revised Child Poverty to bring together all the strands of programmes of delivery and policies under the TPAP around a focus on child poverty. We

believe that there still needs to be more detail about how this is to be implemented but we understand this is to follow.

- 6.2. NSPCC Cymru/Wales believes that targets could be tighter, more ambitious and more closely associated with each of the indicators. We would also reiterate that read across between the TPAP and the Revised Strategy should not constrain ambition in terms of the Child Poverty Strategy. It is also unclear how a child's rights based approach in the Revised Child Poverty Strategy will work alongside the TPAP that does not take such a child's rights focused approach.
- 6.3. If our suggested focus on parenting is taken forward, any actions under the Revised Child Poverty Strategy should work in tandem with the recently published Welsh Government Parenting Strategy (2014), the Early Years Outcome Framework and the Outcomes Framework for Social Services.
- 6.4. We also welcome work that is aiming to bring together a common outcomes framework for Flying Start, Families First and Communities First. We would welcome clarification about when this will become available. We would also underline that any outcomes framework for these programmes must be closely aligned to the outcomes and indicators set out under the Tackling Poverty Action Plan and the new Revised Child Poverty Strategy. It is not clear how this range of overlapping but separate outcomes frameworks and indicators will fit together in a way that does not impose onerous reporting requirements drawing on shared evidence. We would argue that simplification and join-up are important to support practitioners in using these new frameworks. We would therefore welcome further information about how it is envisaged the various sets indicators and outcomes will interact and how this will be used to monitor and evaluate progress.
- 6.5. Linked to our comments in Section 2, 3 and 5, we would like to see a series of indicators around parental risk factors for child neglect, including Domestic Violence, parental mental health issues and substance misuse. A range of data is already available that would help capture these risk factors in the Revised Child Poverty Strategy. As part of the Wales Neglect Project (being run jointly by NSPCC Cymru/Wales and Action for Children) a tool is currently being developed to help capture the scale and nature of neglect across a local area which involves mapping a wide range of data. This aims to unpick the overlapping nature of a range of risk factors which could be instructive for the Revised Child Poverty Strategy.
- 6.6. However, we also believe the 'broad' tackling poverty approach adopted from 2011 onwards, has impacted on the ability to monitor and evaluate progress on addressing child poverty in Wales. The Welsh Government had committed itself to provide annual statistics updating on child poverty milestones and targets with the first of these published in 2010.^{xxiii} However an update for 2011 was not provided due in part to the change in policy direction towards a TPAP approach. In addition, The Children and Young People Well-being monitor was last published in 2011, information at consultation events on the revised Strategy indicated that this would continue. This is something we would welcome. We support ECPN Cymru in calls for arrangements for monitoring and evaluating progress on child poverty to be strengthened. The publication of the Revised Child Poverty Strategy appears to be the natural opportunity to do this.

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- iii Ibid.
- iv Recent research has shown a link between deprivation and higher levels of children who are LAC or on a CPP in England.
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- vii Center on the Developing Child at Harvard University. (2012). *The Science of Neglect: The Persistent Absence of Responsive Care Disrupts the Developing Brain: Working Paper 12*. www.developingchild.harvard.edu
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- xii <http://www.nspcc.org.uk/fighting-for-childhood/our-services/services-for-children-and-families/baby-steps/>
- xiii <http://www.nspcc.org.uk/fighting-for-childhood/our-services/services-for-children-and-families/coping-with-crying/>
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- xv <http://www.nspcc.org.uk/fighting-for-childhood/our-services/services-for-children-and-families/minding-the-baby/>
- xvi <http://www.nspcc.org.uk/fighting-for-childhood/our-services/services-for-children-and-families/improving-parenting-improving-practice1/>
- xvii <http://www.nspcc.org.uk/fighting-for-childhood/our-services/services-for-children-and-families/improving-parenting-improving-practice1/>
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^{xxii} <http://www.childcom.org.uk/uploads/publications/402.pdf>

^{xxiii} Welsh Government (2010). *Eradicating Child Poverty in Wales: Child Poverty Milestones and Targets Update, November 2010*. Cardiff: Welsh Government.