



**Response to:**  
**Welsh Government: Early Years Outcome Framework**

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

## **About us:**

The National Society for the Prevention of Cruelty to Children (NSPCC) believes that every childhood is worth fighting for. To do this we fight for children's rights, listening to them, helping them and making them safe. We share our experience with governments and organisations working with children so together we improve the protection of children and challenge those who will not learn or change. We campaign for better laws and we educate and inform the public to improve understanding about child abuse and neglect.

The NSPCC provides national services such as ChildLine and our Helpline for adults concerned about a child. Our local services in Cardiff, Prestatyn and Swansea provide services that support children who are most vulnerable to abuse, providing help, advice and treatment to children at risk or those who have been abused or neglected.

The NSPCC Strategy to 2016 identifies the following priority themes:

- Sexual abuse
- Neglect
- Physical abuse in high risk families
- Children under one
- Looked After Children (LAC)
- Minority Ethnic Children (MEC)
- Disabled children
- Online safety

The NSPCC is an independent charity that works to improve the safeguarding and protection of children from abuse and neglect. The Children Act 1989 gives the NSPCC the power to make certain applications to the family court to safeguard the welfare of children at risk of significant harm. The NSPCC is the only charitable organisation with this power in England and Wales (we also have similar powers in Northern Ireland).



## Introduction

NSPCC Cymru/ Wales welcomes the opportunity to comment on the Early Years Outcomes Framework. We support the Welsh Government's decision to formulate an early years' outcomes framework and welcome the establishment of common goals for all services and programmes to work towards. We can see the potential that this framework provides to enhance the co-ordination of services and interventions for children in the early years and their families in order to improve outcomes. A co-ordinated approach to service delivery is felt to be particularly important given that early intervention has long been recognised as particularly important to improving the life chances of children and young people and the sheer quantity of the reports calling for early intervention is listed in NSPCC's 2014 How Safe are our children? Data Briefing <sup>1</sup>.

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<sup>1</sup> Jutte, S., Bently, H., Miller, P. and Jetha, N. (2014). *How Safe Are Our Children (2014)? Data Briefing*, Available at: <http://www.nspcc.org.uk/globalassets/documents/research-reports/how-safe-children-2014-data-briefing.pdf> (Accessed 14/01/15)

**Question 1 – Will this framework help to identify where early years policies and programmes are making a difference?**

**NSPCC Response - Unsure**

NSPCC Cymru/ Wales welcomes the introduction of the Early Years Outcomes Framework (EYOF) as a mechanism for identifying where early years policies and programmes are making a difference. We think it is important that it is used to co-ordinate all services and programmes across Welsh Government Departments. However, we would urge that the EYOF does not encroach on the robust evaluation of individual services. Further to this we would hope that EYOF is designed to be significantly robust as to differentiate between the impact of services and wider factors.

Robust evaluations of specific services, such as Flying Start, provide clarity on the effectiveness these programmes. Understanding the impact of specific services is essential as it is possible that while a measured outcome is improving it may not necessarily be the result of a given intervention. As such, evaluations of individual programmes/services are essential to understanding the effectiveness of such programmes. Services that have a validated empirical base and a proven record of successful implementation should be promoted and embedded in Welsh Government programmes..

For this framework to effectively co-ordinate the early years work across the Welsh Government it should be able to differentiate the impact of specific programmes/services and wider social changes. For example, economic prosperity can have a profound impact on many outcomes and it is important that the outcomes framework can identify and attribute any changes in measured outcomes appropriately.

Additionally, the outcomes, and the data being used to measure them, should be subject to regular review and be capable of adapting as our understanding of the needs of early years changes. Essentially, we would urge that the EYOF be able to monitor the needs of children in the early years but also be able to differentiate between the impact of programmes/services and wider factors. It is not evident in the consultation if any consideration has been given to either the process of reviewing the EYOF or interpreting the data in an effective manner.

**Question 2 – Are the seven outcomes representative of what is important to children aged between 0-7?**

**NSPCC Response - Yes**

The proposed outcomes framework embraces a holistic approach to understanding the needs of the early years. Although, as noted later in the consultation response, some further development of the outcomes and the data included in them is needed. Additionally, we would urge the Government to consider revising the ‘do not live in poverty’ outcome. The inclusion of an outcome looking specifically at poverty is greatly welcomed given the strong link between poverty and child welfare<sup>2</sup>. We do, however, have reservations about the

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<sup>2</sup> Bywaters, P. (2013). Inequalities in Child Welfare: Towards a New Policy, Research and Action Agenda, *British Journal of Social Work*, Advanced Access. Available at:

terming of the outcome in its present form. The current phrasing is highly aspirational<sup>3</sup> and might also be interpreted as implicitly suggesting that those living in poverty are at fault for doing so and are subsequently ‘failing’ their children. This is both an inaccurate and unhelpful narrative and we would strongly urge that the outcome be amended to reflect to variable impact of poverty on the welfare of children. A suggested amendment would be ‘not disadvantaged by poverty’.

### Question 3 – If the outcomes are not representative, what is missing?

As previously noted, we feel that this outcomes framework presents an excellent opportunity to promote the welfare of children in the early years. We would like to suggest the following may assist further in improving the EYOF:

- ‘Are cared for, supported and valued’ – While we strongly support a framework focused on supporting the early years we feel that any such approach incorporates some appreciation of the needs of primary care givers. Specifically, we would ask that the early years framework consider the impact of parent/carer substance misuse, poor mental health or illness and domestic abuse on the welfare of children and young people. The ‘toxic trio’, as they are sometimes described, are heavily associated with poor outcomes for children<sup>4</sup>. In order for this framework to be effective it is vital that some consideration be given to understanding the challenges faced by those caring for children. The proposed closure of the Cyd Unit in Cardiff for new mothers with mental health/illness needs represents a considerable setback in support for early years. As the only unit of its type in Wales we would ask that this decision be reconsidered.
- ‘Are healthy’ – The current focus of the ‘are healthy’ outcomes seems to be exclusively on the physical health of the children and young people. While we accept that the number of children under 7 years in receipt of services from Child And Adolescent Mental Health (CAMHS) is likely to be very low it is estimated that one in ten children aged 5-16 has a diagnosable mental health disorder<sup>5</sup>. As such we feel that there needs to be more explicit recognition of the impact of mental ill-health<sup>6</sup>.

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<http://bjsw.oxfordjournals.org/content/early/2013/05/02/bjsw.bct079.abstract?sid=de24f0c3-a54c-4c2e-81ce-ebe48b300106> (Accessed 14/01/15)

<sup>3</sup> The current poverty for tackling poverty in Wales, NAME, seems unlikely to meet its aim of tackling poverty by 2020. Additionally poverty can take multiple forms (absolute poverty, relative poverty and environmental poverty) that can impact on the welfare of children in different ways.

<sup>4</sup> Jutte, S., Bentley, H., Miller, P. and Jetha, N. (2014). *How Safe Are Our Children (2014)?* Available at: <http://www.nspcc.org.uk/globalassets/documents/research-reports/how-safe-children-2014-report.pdf> (Accessed 14/01/15)

<sup>5</sup> Department for health and social services (2013). *Specialist NHS Child and Adolescent Mental Health Services: CAMHS National Expert Reference Group – Professional Advice for Service Planners*, Available at <http://wales.gov.uk/docs/dhss/publications/130709camhsen.pdf> (Accessed on 13.01.14)

<sup>6</sup> This is felt to be particularly important given the variable, and often inadequate, provision of CAMHS in Wales (National Assembly for Wales - Children, Young People and Education Committee (2014) *Inquiry into Child and Adolescent Mental Health Services (CAMHS)*, Available at <http://www.senedd.assembly.wales/documents/s34408/Report%20November%202014.pdf> (Accessed 14/01/15)).

- Play is crucial for children and the right to play is included in the United Nations Convention on the Rights of the Child. NSPCC Cymru/ Wales recommends that play is included as an indicator in the EYOF. Local authorities have a duty under Section 11(3) of the Children and Families (Wales) Measure to secure sufficient play opportunities for children in their areas, so far as reasonably practicable, having regard to their play sufficiency assessments. Further to this under Section 11(4) Local Authorities must publish information about play opportunities in their areas and keep this information up to date. This came into effect on the 20<sup>th</sup> June 2014<sup>7</sup> and we feel that it may be possible that some of the information contained in these returns could be turned into a meaningful indicator.

**Question 4 – Should ‘all children in the early years are happy’ be included as a standalone outcome?**

**NSPCC Response - No**

The use of happiness indicators as part of wider wellbeing measurement tools has been received a considerable amount of attention<sup>8</sup>. However, we are not aware of any validated happiness measurement tools for the early years. In order for this outcome to be useful it is essential that what is meant by happiness is clearly articulated. The potential for ambiguity in the meaning of this outcome serves as a considerable barrier to its effectiveness and so we would advise that this is not included.

**Question 5 – If ‘all children in the early years are happy’ is a standalone outcome what are the most appropriate indicators?**

**Question 6 – Are you aware of any other tools / mechanisms / data that could be used to measure the population outcomes?**

**NSPCC Response – Yes**

Wales is fortunate to have a wealth of data from a variety of sources that can help to inform our understanding of the situation of children and young people. Below we have identified a few factors that we feels would greatly enhance the outcomes framework:

- ‘Are and feel safe’ outcome - Data could be taken from the NHS Informatics Service PEDW. Data on ICD classification broken down by age might assist in understanding issues of safety for children. For example, presentations under ICD W50 ‘hit, struck, kicked, twisted, bitten or scratched by another person’ could help us to understand incidents of physical safety for children. There is a potential wealth of data contained here that is likely to be more reliable than prosecution rates which are dependent on a variety of wider factors associated with the justice system.

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<sup>7</sup> Information adapted from Play Wales website: <http://www.playwales.org.uk/eng/sufficiency>

<sup>8</sup> Frey, B. S. and Stutzer, A. (2012). The use of happiness research for public policy, *Social Choice and Welfare*, 38(4), pp. 659-674

- Are cared for, supported and valued – It is unclear if there is any intention to use the data on the number of children who are being looked after by a local authority (Looked After Children - LAC). As a group that are being 'cared for' it seems that this data might be important. However, complications may result in the interpretation of this data. This is elaborated on further in question 8.
- Are cared for, supported and valued - As included in question 3 above, as children living with carers who have mental health difficulties, are substance misusers or experiencing domestic abuse are at greater risk, we recommend that relevant data that is already collected should be used as indicators.

### Question 7 – Can you see how your contribution to the early years in Wales fits into the Framework?

#### NSPCC Response - Yes

The NSPCC works to support children and young people who are at risk of or have experienced abuse and neglect as well as their families/carers. Our services aim to improve the outcomes of these children and young people through the provision of a range of innovative services that are being fully evaluated. We currently offer a range of services specifically targeting the early years:

**Baby Steps** - Baby Steps is an ante and postnatal education programme that supports those most in need to prepare for parenthood and is run in 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. Groups are led by someone who works in children's services, like a family support worker and a health visitor or midwife. Sessions include films, group discussions and creative activities. They're interactive and designed to build confidence and communication skills. The programme is for mothers and fathers and findings from the evaluation are that mothers and fathers report decreased anxiety, an improvement in relationship satisfaction and lower rates of adverse birth outcomes compared to the general population.

**Coping with Crying** - 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<sup>9</sup>. 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.

**Minding the baby** - 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

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<sup>9</sup> Sidebotham, P. and Fleming, P. (eds.) (2007) *Unexpected death in childhood: a handbook for practitioners*. Chichester: Wiley.

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.

**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 to a Welsh Government Social Services commissioned development project called the Welsh Neglect project that 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 possible inclusion in the EYOF.

All of our services are subject to robust evaluation and are monitored for quality assurance and programme fidelity. As such we feel that our services will help support the aims of the framework and have a tangible impact on the identified outcomes.

**Question 8** – It is the intention that the outcomes framework will be a useful tool for planning and evaluation which will support improvements where needed. What are the potential challenges, if any, with the early years outcomes framework on a practical level?

NSPCC Cymru/ wales feels that the EYOF is an appropriate framework for planning and evaluation and has potential to co-ordinate the work of different departments and divisions across the statutory sector. We would envisage the following potential challenges to the using the framework on a practical level:

**Awareness and use** – For the EYOF to be effective it is important that the framework be publicised across statutory services to ensure 'buy-in' from stakeholders. NSPCC Cymru/ Wales believes that for it to fully achieve its co-ordinating potential the EYOF should be a requirement for the planning that is done for every service and programme delivered to early years children and their families. The Seven Core Aims was a required framework for the Children and Young People Plans required from local areas under Section 26 of the Children Act 2004. The framework enhanced planning and co-ordination of services for children and families in local areas and ensured a focus on children and young people. The single integrated plan guidance replaced this framework and in NSPCC Cymru/ Wales' view the lack of a framework has contributed to a regrettable reduction in focus on children and young people.



**Interpretation of the framework** – It is important that programmes and services that do not easily fit into a given outcome measure, or can't easily be linked to one of the outcome measures, are still given opportunities to demonstrate their worth and importance in supporting children and their families. We would ask the EYOF outcomes do not become the only consideration in the commissioning of services for the early years. Some flexibility in the design and commissioning of services should be encouraged.

Further to this, there is a risk about the interpretation of certain data included in the EYOF. Specifically the inclusion of Child Protection Register (CPR) and Child in Need (CIN) data poses considerable challenges. A reduction or increase in either of these services is not necessarily a negative or positive factor as they are, in part, subject to the threshold of services delivering them. Careful consideration needs to be given to the reason behind the data and not just understood in terms of trends.

**Link to existing and wider strategies** – For the EYOF to be effective multi-agency work will be essential. The EYOF could serve to promote the importance of adopting a holistic approach to understanding the need of children in the early years. A detailed mapping exercise might help to identify the state of current provision whilst also potentially identifying gaps in services. The mapping contained in the consultation document could be greatly expanded to aid this task. Doing this is, admittedly, a complex task.

**Question 9** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

We have the following additional points that we would like to raise:

**United Nations Convention on Rights of the Child (UNCRC)** – The EYOF applies to all children and so the UNCRC is applicable; therefore the EYOF needs to be mapped against the UNCRC and clearly referenced. The Rights of Children and Young Persons (Wales) Measure 2011 and the Seven Core Aims set out under the Children and Young People: Rights to Action (2000) both demonstrate the Welsh Government's determination to use this as the foundation for all work with children and young people. As such, we feel this Framework should make explicit reference to articles of the UNCRC. For example,

- Are and feel safe – Articles 6, 19, 25, 32, 33, 34, 35, 36, 37, 38, 39, 40
- Are cared for, supported and valued – Article 16, 17, 20, 30,
- Are resilient, capable and coping – Article 20, 23, 39
- Are healthy – Articles 6, 23, 24, 27
- Learn and develop – Articles 13, 14, 17, 28, 29, 30, 31, 32
- Do not live in poverty – Articles 26, 27
- Are happy – Article 31

As previously indicated, Article 12 (the right to say what they think should happen when adults are making decisions that affect them, and to have their opinion taken into account) does not appear to be clearly articulated in the proposed Framework. While we accept this is difficult to capture in an outcomes Framework some explicit recognition of this article and how the outcomes can contribute towards this would be a great improvement. It might be possible to include something on this in the 'are happy' outcome.

**Fit with Seven Core Aims-** The Seven Core Aims is Welsh Government's synthesis of the UNCRC and we would like to better understand how the EYOF fits with the Seven Core Aims.

**Fit with other outcomes frameworks-** We feel it is essential that the EYOF fits with the outcomes frameworks in place or under development for Tackling Poverty and the Social Services and Wellbeing Act 2014.

**Feedback and queries –** We are happy for our consultation response to be made public. If any further information is needed, then please contact the NSPCC Policy and Public Affairs Team for Wales via email – [publicaffairs.cymru@nspcc.org.uk](mailto:publicaffairs.cymru@nspcc.org.uk).