

Chair, Finance Committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1NS

November 2023

Dear Peredur Owen Griffiths MS,

Re: Welsh Government Draft Budget Consultation

We are responding as a collective of children's organisations (listed below) to your call for evidence to inform your scrutiny of the Welsh Governments 2024-25 draft budget proposals being published in December 2023.

Within the context of the challenging fiscal and cost-of-living pressures impacting on babies, children, young people and their families, alongside the demands being placed upon public and third sector services providing essential preventative and crisis support, we believe that the 2024-25 budget provides a unique opportunity to **place babies, children and young people at the centre of the budgetary process.**

It has been well documented that babies, children and families, particularly those most vulnerable and disadvantaged due to their characteristics or circumstances, continue to be most exposed to and disproportionately affected by present adversities and the legacy of the global pandemic. This is evidenced through the reported rise in mental health difficulties, poorer emotional well-being, worsening health and education outcomes, and deteriorating family financial situations being witnessed across our services.

Investing in babies, children and young people is not only morally right, but also makes economic sense.

Protecting children's rights and their well-being by investing in programmes and quality services can help break the cycle of poverty and disadvantage for families and enable babies, children and young people to thrive and reach their full potential, minimising inequalities in health, education and life chances.

We are therefore calling for the 2024-5 budget to be an ambitious budget for babies, children and young people.

Below, we identify a number of priorities for investment that will deliver for babies, children, young people and their families.

Investing in interventions for babies, children and young people

We recognise the difficult financial climate in which budgetary decisions are now being made in the context of 13 years of austerity, the legacy of the global pandemic and the unrelenting cost of living crisis impacting on babies, children, young people and families and those services which are accessed.

In this context, it is therefore vital that a concerted effort is made across all government departments to fully protect the budgets for those programmes, interventions and services which an increasing number of babies, children, young people and families are reliant upon. Demand for services across the children's third sector are exceptionally high, reflecting growing levels of need and complexity of need amongst babies, children, young people and their families.

Whilst it's understandable and desirable that ministers will wish to look to safeguard services and interventions which provide an essential support mechanism for babies, children, young people and families currently in crisis, it is equally essential that early intervention, family support, edge of care and prevention programmes are also protected and strengthened to limit future demand and escalation of need. We do not wish to see babies, children, young people and families having to wait until their situations reach crisis point to then be eligible for more costly interventions.

The Welsh Government should

- Prioritise investment in interventions which are delivering positive outcomes for babies, children, young people and their families.
- Ensure that early intervention and prevention programmes are prioritised and fully resourced, alongside services which provide crisis support.

Ending Child Poverty

The unrelenting cost of living crisis is showing no sign of ending anytime soon and is leading to increasing levels of poverty that continue to have a devastating effect on the families that we work with. Addressing child poverty levels was one of the key recommendations in the State of Children's Rights in Wales Report¹ and this was repeated in the Concluding Observations from the United Nations Committee on the Rights of the Child² in June this year.

We welcome Welsh Government's consultation on its new child poverty strategy. However, we remain concerned that without a national, child-rights-focused Child Poverty Action Plan to provide a measurable pathway and prioritised funding for the implementation of the strategy, then the situation will continue to worsen for many families.

¹ Wales UNCRC Monitoring Group (2023) [State of Children's Rights in Wales](#) : Civil Society submission to the UN Committee on the Rights of the Child, Children in Wales.

² United Nations Committee on the Rights of the Child (2023) [Concluding Observations](#) : United Kingdom of Great Britain and Northern Ireland, UN Treaty Bodies

We would encourage Welsh Government to consider a number of other key areas to support babies, children, young people and families in the upcoming budget.

While we welcome the continued role out of Free School Meals to all primary school pupils, we are keen to see a budget commitment to extend this offer to all secondary school children whose families are in receipt of Universal Credit, in line with the existing Programme of Government commitment to review eligibility criteria³. The critical Impact Assessment Report⁴ into the decision to withdraw Free School Meals during school holidays made earlier this year, echoes our previous collective concerns⁵ and calls for this much needed provision to be restored in light of escalating food insecurity and hunger amongst low-income children and families. The simultaneous cut to the School Essentials Grant at this time has also acted as a multi-layered hit to families and further emphasises the need for review of the effectiveness and sustainability of support currently being offered to families to account for the cost of schooling.

Accessible and affordable transport has been repeatedly identified by children and young people as a barrier and priority for government action⁶. We would like to see funding allocated to ensure under 16's can have access to free public transport.

We would also like to see a commitment to the introduction of a child payment similar to that being delivered in Scotland, especially in light of the positive outcomes it is delivering for parents of eligible children⁷.

Babies and very young children are particularly vulnerable to the impacts of poverty. Children's experiences in their first days, weeks and years significantly influences the rest of their lives. We welcome the recent expansion of Flying Start but want to see an enhanced childcare offer for all 0–4-year-olds across Wales, ensuring all children living in poverty are able to access high quality childcare regardless of their parents work status.

Additionally, we are growing increasingly concerned about the number of asylum seeker families who are waiting lengthy amounts of times; some up to five years based on the families some of our member organisations have supported, to receive their official refugee status. In the interim, families are ineligible for the majority of impactful and essential support and are relying upon the generosity of charities. Although we recognise the limit to Welsh Governments powers to shorten this process for asylum seeker families, we urge Welsh Government to recognise asylum seeker families who are in crisis as a result of this shortfall and to provide effective intervention for babies, children, young people and families who are suffering in poverty and feel left behind.

³ Welsh Government (2021) [Programme for Government](#), PP. 5

⁴ Welsh Government (2023) [Holiday Free School Meals Impact Assessment](#)

⁵ Children in Wales, Save the Children Cymru, Barnardo's Cymru, Action for Children Cymru/Wales, NSPCC Cymru/Wales, The Children's Society, TGP Cymru, NYAS Cymru, Home-Start Cymru (2023) [Correspondence with Senedd Children, Young People and Education Committee in relation to cuts to Welsh Governments decision to scrap free school meals during school holidays](#).

⁶ Young Wales/Children in Wales (2023) [Young Wales report to the United Nations Committee on the Rights of the Child](#)

⁷ The National (2023) [Scottish child payment significantly impacting child poverty](#) (22.09.23). See also Scottish Government (2022) [Scottish Child Payment: Interim evaluation](#)

The Welsh Government should

- Ensure that the revised Child Poverty Strategy is fully resourced with a tracking mechanism in place through an Action Plan to monitor investment and spend.
- Extend Free School Meals to all secondary school children whose families are in receipt of Universal Credit and to reverse their decision to remove Free School Meals during school holidays.
- Enable all children and young people under 16 to have free access to public transport.
- Consider replicating the Scottish Child Payment scheme in Wales.
- Invest in an enhanced childcare offer for all 0–4-year-olds across Wales.
- Provide robust and sustainable support for asylum seeker families as they wait to receive their refugee status to prevent families going into crisis.

Mental Health

Through our extensive work across Wales, we know that babies, children and young people are struggling with their mental health. Successive crises from the pandemic to the cost of living are having a significant impact on health and wellbeing and this will continue unless it is urgently addressed. The EHRC's 'Is Wales Fairer 2023' report⁸ highlights that Wales has the highest demand for Community Mental Health Teams for children and young people in the UK.

We remain concerned about the impact of child poverty on mental health. Long waiting lists are also taking their toll on young people along with limited access to sufficient support for those who don't meet the statutory threshold.

Babies and young children who have experienced abuse, trauma or parent-infant relationship difficulties are at particular risk of experiencing a range of mental health problems throughout their lives, requiring timely and effective early support, and access to specialist therapeutic services to help them recover from early adversity, and which are lacking⁹. Investment in services which support babies' mental health will help to set children on a positive developmental trajectory, bringing savings to the public purse through reduced costs for public services and increased participation in the economy¹⁰.

The Welsh Government should:

- Invest in third sector services that support the wellbeing of children, young people and their families.
- Ensure CAMHs are better resourced so all children and young people can access support when needed and children have access to long-term recovery after initial interventions.

⁸ Equality and Human Rights Commission (2023) [Is Wales Fairer?](#)

⁹ Specialised parent-infant relationship teams provide therapeutic support where babies' development is most at risk due to severe, complex and/or enduring difficulties or trauma in their early relationships. These teams work to strengthen early relationships, which are protective, and they help babies to recover from early adversity. There are only two specialised parent-infant relationship teams in Wales. See Hogg, S (2019) [Rare Jewels. Specialised parent-infant relationship teams in the UK](#). Parent Infant Partnership UK, and NSPCC (2021) [Infant and Family Teams](#).

¹⁰ First 1001 Days Movement [Investing in Babies The economic case for action](#). Evidence Brief 6

- Invest in parent-infant relationship services, to ensure there is a team in each area of Wales that can support babies and young children who have experienced trauma and abuse and parent-infant relationship difficulties.
- Provide additional funding to address the lack of support for those in the 'missing middle' where young people do not meet the threshold for statutory services.
- Ensure that children, young people and their families can access mental health services within their own local authority area.

Edge of Care & Care-experienced children and young people

We support the Welsh Government's vision to transform children's services through enabling more children to remain with their families with fewer children entering state care. Achieving this vision requires a shared commitment as well as sustainable long-term investment in preventative, family support and edge of care programmes of support for babies, children, young people, parents (including expectant mothers) and families, including provision through the Families First programme.

The upcoming budget also provides an opportunity to ensure that care-experienced young people have access to financial support and advice to help them transition towards living with more independence. This is especially important in light of the recent Senedd CYPE Committee's inquiry report¹¹ into Welsh Government's commitment to reform children's social care, in which it found that many young people face a 'cliff edge' of support after leaving care, such as access to financial support and advice.

Although we welcome the Basic Income Pilot and await to learn the outcomes from the evaluation of the pilot, it is important to remember that not all care-experienced young people have participated in the pilot, either because they will have already left care or will have missed the window for participating in the pilot, and therefore will not have received the financial support brought about by participating. It is crucial that these children and young people are not forgotten, and that Welsh Government ensures that they have the financial stability to make the best possible start in their adult lives.

The Sustainable Social Services Third Sector grant has been invaluable in transforming the way people's needs for care and support are met, empowering third sector organisations, with a proven track record in delivering projects throughout the social care sector, to deliver critical front-line services within a three-year funding window. The removal of this grant, and focus on short-term, project-based funding, will reduce the efficacy and long-term benefits of established projects while putting additional strain on third sector organisations from both a financial and resourcing perspective.

Additionally, we urge Welsh Government to provide funding to ensure that the elimination of profit from children's social care is done as safely as possible. We note the recent commitment of £68m of funding over the next three years for developing new local authority provision, but sufficient funding must also be available to assist existing for-profit providers to transition towards becoming not-for-

¹¹ Senedd Children, Young People and Education Committee (2023) [Services for care experienced children: exploring radical reform](#)

profit providers, and for ensuring that transitional provision is in place so that the care provided for children and young people is not disrupted.

The Welsh Government should

- Sustain investments into vital support programmes to continue keeping families together, wherever safe to do so. This should include the protection of Families First to continue offering early intervention and prevention services to families across Wales.
- Ensure there is sufficient investment in programmes which support care experienced children and young people, and which deliver the radical reform required as identified by the Senedd CYPE Committee inquiry and 27 recommendations.
- Ensure the future of the Sustainable Social Services Third Sector grant, providing a long-term funding commitment to critical third sector led projects and initiatives that support, safeguard and empower the lives and voices of babies, children and young people throughout Wales.
- Provide a long-term solution to financially supporting young people transitioning from care (post Basic Income Pilot), through embedding a more holistic, wrap-around financial and employment/education/training offer, to ensure that no child with continuing support needs is left behind.

Children's Rights

Children's rights should be at the forefront of all budgetary decisions, with all ministers being required to ensure that all matters which impact on children, including financial considerations, are fully compliant with the UNCRC.

We have consistently called for the Welsh Government to produce and publish a Children's Rights Impact Assessment (CRIA) as part of the budget, to demonstrate compliance with statutory duties prescribed through Section 1 of the Rights of Children and Young Persons (Wales) Measure 2011 and the Articles of the UNCRC¹². The Senedd CYPE Committee have repeated their calls for a CRIA¹³ to be published, despite the Welsh Government rejecting previous recommendations¹⁴. In June, the UN CRC Committee again called upon the Welsh Government to '*Develop mandatory child-rights impact assessment procedures for legislation and policies relevant to children*¹⁵'

The Welsh Governments preference for a holistic Strategic Integrated Impact Assessment to accompany their draft budget means that it is not possible to assess or analyse whether the 'maximum level of available resources' to fulfil UNCRC obligations are being met.

¹² Wales UNCRC Monitoring Group (2023) [State of Children's Rights in Wales](#) : Civil Society submission to the UN Committee on the Rights of the Child, Children in Wales

¹³ Senedd Children, Young People and Education Committee (2023) [Letter from Chair of the Committee to the Minister for Health and Social Care, Deputy Minister for Social Services and Deputy Minister for Mental Health and Wellbeing](#)

¹⁴ Senedd Children, Young People and Education Committee (2023) [Welsh Government Response to the recommendations from the Children, Young People and Education Committee Report: The Welsh Government's Draft Budget 2023-24](#)

¹⁵ United Nations Committee on the Rights of the Child (2023) [Concluding Observations](#) : United Kingdom of Great Britain and Northern Ireland, UN Treaty Bodies

There is a lack of transparency on expenditure on children in public budgeting across all ministerial portfolios making it difficult to track and assess changes in funding allocations to specific policy priorities and programmes, as well as the proportion of spend on children. Without transparent evidence it is impossible to determine whether the Welsh Government have adhered to their duty of due regard to the UNCRC or whether the principle of the 'best interest of the child' has been applied.

A published CRIA would aid openness, transparency and accountability, and enable us to better understand how budgetary decisions are taking account of babies, children and young people and whether allocations are sufficient.

The Welsh Government should

- Publish a CRIA alongside its 2024-25 budget.

We have welcomed the opportunity to provide input into this consultation and would be happy to provide more information should this be required.

Yours sincerely,

