

Annual Report Recommendations – REVIEWED October 2024

Each year through my annual report I make recommendations to the Welsh Government, on the key policy issues that I would like to see action on in the following twelve months. During the year I follow these recommendations up through meetings with Ministers, lead officials, and other stakeholders including children and young people.

I have given each recommendation a Red / Amber / Green rating to measure the progress against the call that I have made. The colour rating is my own assessment based on the engagement with all key stakeholders. It is important to note that the rating is not an assessment of whether or not the Welsh Government agrees with the recommendation. The colour rating reflects whether or not there have been any policy and practice changes that improve children's lives in Wales and give further protection to their enjoyment of their rights under the UNCRC.

For the first time, Welsh Government did not indicate in their formal response to my 2022-23 annual report whether or not they accepted my recommendations. I have therefore had to interpret their responses and any subsequent actions for myself, judging by the following standards:

- Red** No evidence of policy or practice changes since the recommendation was made. No improvement in children's experiences.
- Amber** Some evidence of policy or practice change but the recommendation has not yet been successfully achieved in full.
- Green** Recommendation implemented and notable differences for children and young people in receipt of a service or support.

Topic	Recommendations	Current RAG rating	Comments
Poverty	<p>The Welsh Government must create a child poverty action plan alongside a clear monitoring framework with measurable, time-bound targets, and a robust accountability mechanism to enable sensitive input from children and young people.</p> <p>This must be published within the 2023/24 Senedd term.</p>	AMBER	<p>This recommendation has essentially been rejected by Welsh Government.</p> <p>The revised child poverty strategy was published in January 2024 but does not include an action plan.</p> <p>Welsh Government has committed to developing a new monitoring framework and we will continue to work closely alongside them on this.</p> <p>The monitoring framework will be published in Autumn 2024. The first report against these indicators and measures will be published in December 2025.</p>
Climate emergency	<p>To address both child poverty and the climate emergency, the child poverty action plan should include a commitment to a free public transport pilot for children and young people under 18 within this Senedd term.</p>	RED	<p>This recommendation has been rejected by Welsh Government. The Government has also rejected the main recommendations of the Freedom to Thrive report from the Petitions Committee on this topic.</p>
Mental health and wellbeing	<p>The Welsh Government should ensure that the needs of children and young people are clearly reflected and addressed in their new Mental Health Strategy, and that the recommendations from the Senedd leuencid’s Young Minds matter report are reflected in this strategy.</p>	AMBER	<p>Welsh Government consulted with children and young people while developing the new draft mental health strategy, through a pre-consultation on the draft vision statements and supporting principles in an online survey. However, of the 250 responses, they are unable to demonstrate how many respondents are children or young people.</p> <p>The government also consulted on the draft strategy through engagement with the National Youth Stakeholder Group, who held a focus group on the draft strategy in summer 2023. Additional workshops were then held in the</p>

	<p>The Welsh Government should publish an update within 2023/4 on their progress against the Senedd Ieuenctid's</p>	<p>autumn 2023 with the National Youth Stakeholder Group and Welsh Youth Parliament.</p> <p>The Government engaged with children and young people during the consultation period for the draft Strategy, in partnership with the Co-Production Network for Wales. This consisted of running focus groups and supporting others to run their own consultation sessions with the children and young people they work with.</p> <p>There was also a young person's version of the consultation for individual children to compete, or to help assist group sessions. The Government has also produced a good quality, detailed Children's Rights Impact Assessment (CRIA), published alongside the consultation documents.</p> <p>While the strategy does discuss issues of relevance to children and young people, and there are sections we welcome, we are concerned that children and young people's specific needs could get 'lost' within an all-age strategy. There will be Delivery Plans produced in the coming months. These must have specific actions relevant to children and young people 's services, as well as actions to improve transitions from children to adult services.</p> <p>The Welsh Government have stated in their CRIA that <i>"The Welsh Youth Parliament's Young Minds Matter Report has been used as fundamental evidence for the drafting of the Mental Health and Wellbeing Strategy"</i>.</p> <p>We understand that there are no plans from Welsh Government to provide a formal update on their progress against these recommendations. The Commissioner met with the Deputy Minister in January 2024 and suggested</p>
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	<p>recommendations in their Young Minds matter report.</p> <p>The Welsh Government should ensure that the implementation of the Whole School Approach Framework is closely monitored to ensure it is delivering on its intended aims, addresses the needs of those with protected characteristics, and responds to emerging evidence about children and young people’s mental health.</p>		<p>the potential use of a progress tracker against recommendations to aid accountability. At the time of writing we are unaware of any actions which would address this recommendation.</p> <p>There are two ongoing evaluations of the whole school approach. Public Health Wales are conducting review looking at use of their resources (such as self-assessment tools, regional coordinators). They have a dashboard tracking progress within schools. This is welcome.</p> <p>There have been efforts to involve children and young people in this work at national level through Public Health Wales, but at individual school level it appears to not be particularly clear how children and young people are directly involved in making individual school plans. There should be a focus on this in evaluations.</p> <p>DECIPHer and the Wolfson Centre are also conducting an evaluation. They have a broader focus than PHW – on implementation of the framework in a broader sense. The research undertaken so far appears to be comprehensive. The study is expected to be completed in 2026.</p> <p>There are welcome improvements in the data from Public Health Wales for how many schools now have a whole school approach plan, and are progressing those plans into action. Most schools implementing the whole school approach report frequent communication from the dedicated implementation coordinators at health board level, but some report little or no communication.</p>
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Healthy Child Wales programme	<p>The Welsh Government, in conjunction with NHS Wales, must ensure that local health boards are equipped to input timely and accurate data for the Healthy Child Wales programme to reflect adherence to the scheduled screening, immunization and monitoring meetings that families can expect.</p> <p>The Daily Active Programme should commence without further delay.</p>	AMBER	<p>We understand that Welsh Government has been looking at the data reporting and recording of the Healthy Child Wales Programme and what this tells us about capacity and workforce. I look forward to hearing next steps on ensuring data reporting is accurate.</p> <p>This spring, as part of their quarterly performance and delivery monitoring, Welsh Government have included questions related to the delivery of the Healthy Child Wales Programme, including resourcing of the workforce and monitoring effectiveness and quality of services. This focus is welcome.</p> <p>New guidance was published, accompanied by a Ministerial circular, in April 2024 for school nursing contacts for children aged 5-16. This is welcome. However, we believe the Healthy Child Wales Programme is in need of a review in order to properly establish the current offer, gaps in the service and what actions will be taken to address them, including sharing good practice examples between health boards.</p> <p>We understand that the Daily Active Offer is currently in development but we are not aware of any significant progress towards implementing this policy in schools.</p>
Vaping / e-cigarettes	The Welsh Government should publish clear guidance for schools for the regulation of vaping.	AMBER	The first part has been completed. Guidance was published in September 2023, which we welcome.

	<p>The Welsh Government should explore a child and young person’s public health campaign, highlighting the known and potential dangers of vaping.</p>		<p>There are currently no plans for a public health campaign. Our understanding is that this is in part because of concerns over the potential to highlight vaping to children who would not otherwise be aware of it. I support Public Health Wales’ cautious approach, but hope that a public health campaign remains under consideration.</p> <p>We have been pleased to see the work of Public Health Wales’ Incident Response Group, who have published a report setting out potential control measures for Welsh Government to consider. We urge Welsh Government to do all it can do make those control measures a reality. We welcome moves to ban disposable vapes in Wales, with a ban due to be in force from 1 April 2025. Several of the required measures are the responsibility of Uk Government. We are pleased therefore that Uk Government will be progressing the Tobacco and Vapes Bill. However, the timeframe for passage through the Houses of Parliament is unclear at the time of writing.</p>
<p>Gender identity services</p>	<p>Welsh Government should expedite work committed to in the LGBTQ+ Action Plan on exploring a Welsh Gender Service for children and young people, to replace reliance on commissioning services from NHS England.</p> <p>A new gender identity service for Wales should be established.</p>	<p>RED</p>	<p>The Welsh Government/WHSSC say there are no immediate plans to develop a children and young people's gender service independent to NHS England's.</p> <p>The Cass Review final report was published in April 2024. The report was clear that there is a need for a new regional model of service delivery. The report states that the “model will also support integration between different children’s services and facilitate early access to local services along flexible pathways that better respond to individual needs”.</p> <p>It is unclear at this stage how the offer in Wales will look if there is to be no Welsh-based service. Welsh Government will need to explain how children will be supported locally in the multi-agency way Cass describes. It is vital that Welsh young people themselves are properly involved in the development of new services that Welsh young people will use. It is unclear at this stage what engagement with young people will take place.</p>

<p>Social care and radical reform</p>	<p>The Welsh Government must publish a detailed road map of all actions associated with the Radical Reform of Children’s Social Care Programme, including progress of action undertaken associated with child protection and safeguarding. This should be underpinned by timescales and outcome indicators.</p> <p>This must report annually to ensure children and adults can hold the Government to account on progress towards their vision of reform.</p>	<p>AMBER</p>	<p>The Welsh Government response states that they have already published an action plan, which “will be updated to include key actions being taken forward associated with child protection and safeguarding”.</p> <p>A new communications bulletin is now published and this is welcome.</p> <p>The second Care Experience Summit took place in March 2024. The Health and Social Care Bill is currently before the Senedd for consideration.</p>
<p>Safeguarding of children</p>	<p>Welsh Government should confirm how the Single Unified Safeguarding review proposals will adequately ensure the learning emanating from child practice reviews will be implemented and monitored.</p>	<p>RED</p>	<p>The SUSR process came into force in October 2024. The changes we suggested to Welsh Government to strengthen the governance and processes to ensure lessons are adequately learned from CPRs have not been made, despite our consultation response, follow up meetings and correspondence with the Deputy Minister.</p> <p>The effectiveness of the new roles and structures under the SUSR remain to be seen but at present we are not suitably assured that the system will be suitable to ensure all practitioners across a range of agencies will hear about and address practice issues arising from Reviews.</p> <p>We have been advised through correspondence regarding a recently published Child Practice Review report that the WLGA is no longer hosting the Co-ordination Hub as this has been brought in-house to Welsh Government. This means that there is no mechanism external to Government as part of the new governance arrangements.</p> <p>We do not currently have access to the new Repository which is to house all reports and actions plans, despite sitting on the Strategy Group convened by Welsh Government.</p>

Safeguarding – CSA action plan	Welsh Government should ensure that the renewed National Action Plan on Preventing Child Sexual Abuse effectively responds to the recommendations of the IICSA enquiry and sensitively incorporates the views of children and young people.	AMBER	<p>We are aware that the National Action Plan is currently under review/revision, and that work will be undertaken on a Child Exploitation Toolkit to complement existing Practice Guides.</p> <p>The second plan has been undertaken with the involvement of children and young people.</p>
Safe housing of vulnerable children	<p>Welsh Government should consider the findings emerging from the workstream on OWR, together with the data emerging from CIW’s work on the topic, and urgently produce an action plan to respond to the identified needs during 2023/24.</p> <p>Welsh Government should urgently assess the progress of planned accommodation being developed by Regional Partnership Boards and commissioned by WG and seek to address barriers to completion of this work.</p>	AMBER	<p>The workstream has commissioned direct work with children and young people to explore their experiences and develop practice in this area.</p> <p>The accommodation provided by RPBs has progressed - we are pleased to hear that new safe accommodation is being developed in all regions. However, it is unclear which projects are now fully operational. We are aware of three – in Gwent, Powys and North Wales.</p> <p>Welsh Government tell us that a new more robust monitoring framework was implemented from October 2023. Welsh Government are also establishing a Community of Practice for regional accommodation for children and young people with complex needs. We look forward to hearing more details of the evaluation.</p>
Strip searches of children and young people	Welsh Government should review the “Safe and effective intervention – use of reasonable force and searching for weapons” guidance to ensure there is adequate and up to date	AMBER	Welsh Government have committed to working with partners on implementation of the restrictive practices framework in education settings, including reviewing the ‘Safe and effective intervention – use of reasonable force and searching for weapons guidance’.

	guidance for schools and governing bodies in Wales, to understand and effectively carry out their roles and responsibilities when strip searches of children are being proposed or have been carried out		We are not aware of any progress having been made in this space to date or any revisions to the guidance.
Racism in schools	<p>The Welsh Government should deliver on its commitment within the (ARWAP) to strengthen the existing anti-bullying guidance for schools (Rights, Respect, Equality 2019) to recognise the particular needs of learners from ethnic minority backgrounds.</p> <p>The Welsh Government should take the necessary actions within 2023/24 to establish ‘a Wales-wide system of reporting and data collection which will specifically collect data in relation to bullying and harassment, including on the basis of protected characteristics’ as identified in its Anti-racist Wales Action Plan.</p> <p>In order to improve the experiences of Black, Asian and Minority ethnic learners in schools, the Welsh Government should carefully consider and formally respond to the Commissioner’s forthcoming thematic report on racism in schools including recommendations around teacher training on racism.</p>	AMBER	<p>Welsh Government are in the process of updating existing anti-bullying guidance. In recent correspondence, Welsh Government have indicated that the updated guidance will include the following:</p> <p><i>“The update will take account of recent data shared by learners about their experiences, including experiences related to prejudice-related bullying.</i></p> <p><i>The updated guidance will reflect changes in legislation and current policy developments, including the Anti-Racist Wales Action Plan commitment to strengthen the existing guidance in respect of bullying on the ground of race, the experiences of racism raised by the Children’s Commissioner’s recent report and also the issues raised in Estyn’s report on peer on peer sexual harassment in secondary school.</i></p> <p><i>The update will also expand on advice for education settings on recording different types of bullying and how this data can be used to effectively plan preventative approaches and interventions.”</i></p> <p>Welsh Government have indicated that they will be formally responding to the thematic report and are currently mapping the recommendations to the re-iteration of the ARWAP.</p>
Gypsy, Roma and Traveller children and young people in education –	The Welsh Government should establish a community forum or similar to facilitate ongoing dialogue with Gypsy, Roma and Traveller communities.	RED	Whilst Welsh Government have expressed that this would be a consideration in the future, there is no current plans or timeline in place to develop this piece of work. We are aware that new staff members have recently been appointed to the policy team in Welsh Government, which is welcome.

community forum			
Gypsy, Roma and Traveller children and young people in education – RSE guidance	The Welsh Government should publish standalone guidance around the delivery of RSE, which includes case studies to help schools support the needs of all learners	AMBER	Welsh Government have indicated that they are in the process of engaging with stakeholders and developing guidance however there is no current timeline on publishing this standalone guidance.
Support for disabled learners and children with additional needs	<p>Welsh Government should review the professional learning on ALN for teachers, and consider making a placement in specialist ALN provision (including STF units in mainstream schools) as a mandatory part of all teacher training (ITE).</p> <p>Welsh Government should ensure a long-term plan is in place to ensure placement sufficiency of specialist provision to meet the needs of the growing cohort of learners with identified complex needs.</p> <p>Welsh Government should review the mandatory training requirements for school governors and revise the guidance, to include in particular additional learning needs, related issues such as exclusions and reduced timetables, and the requirements of the new curriculum.</p>	AMBER	<p>Welsh Government committed to “exploring with special schools and ITE partners the issues and opportunities for greater involvement of special schools in ITE.”</p> <p>Welsh Government have provided further funding to meet the needs of learners with ALN but their response indicates that this is a matter for local authorities.</p> <p>I welcome that Welsh Government have committed to reviewing the mandatory training requirements for school governors and associated guidance and legislation ‘to consider if amendments should be made’. This is important to ensure governors understand the extent of their roles and are equipped to effectively challenge their schools in the role of critical friend, and should be done as a matter of urgency, and with the necessary follow on actions to support these changes.</p>

Support for disabled learners and children with additional needs – neurodivergence	Welsh Government should progress the planned work of the Neurodivergence Improvement Programme to bring a consistent, Wales-wide approach to private medical diagnoses, including publishing operational guidance and a framework for clinicians.	AMBER	<p>While the Improvement Programme is working on several strands which aims to improve the experience of neurodivergent children and families seeking support, (including work on a digital offer, and a new advice line), it is unclear currently how the Programme will develop the culture change that is needed to tackle the huge waiting lists and inconsistent support across Wales.</p> <p>The Neurodiversity Improvement Programme is funded up to 2025 only. It is clear that much more progress is needed, so we hope to see this work extended.</p>
School exclusions	<p>The Welsh Government should complete their planned revision of the statutory guidance on exclusions in 2023/24, strengthening the guidance for specific groups disproportionately affected by exclusions and other sanctions, including younger children, those with protected characteristics, those with ALN and those eligible for free school meals.</p> <p>Welsh Government should provide an update on its comprehensive review of all guidance relating to attendance, behaviour and exclusion.</p>	AMBER	<p>The Government committed to updating the ‘Exclusions from Schools and Pupil Referral Units’ guidance, in two stages. The first stage of the amendments was to be published during the autumn term and subject to full consultation.</p> <p>The Government has published information regarding work to improve learner engagement and attendance, and has convened the Ministerial led Attendance Taskforce. The Commissioner is a delegate of the taskforce and also sits on the youth engagement workstream.</p> <p>We look forward to engaging with the full consultation(s) when issued.</p>
Home education	The Welsh Government should create regular opportunities during 2023/24 for continued engagement with home-educating families as the guidance is implemented.	AMBER	We are not aware of any further engagement work by Welsh Government since the sessions held jointly between our office and Welsh Government.
Youth services	Welsh Government should progress and conclude its planned youth work funding	AMBER	Priorities directed by the Minister for the Youth Work Strategy Implementation Board include –

	<p>review within this Senedd term, to ensure that youth work services can be put on a sustainable footing to protect these vital services longer-term.</p>		<ul style="list-style-type: none"> • Concluding an independent review of funding for youth work in Wales; • scoping role and remit for potential national body for youth work in Wales; • strengthening the legislative basis for youth work in Wales. <p>This relates to a long term goal of pursuing a dedicated Youth Work Act.</p> <p>We are aware that a consultation is expected on a draft model for Youth Work Services in Wales.</p>
<p>Education in health care settings</p>	<p>The Welsh Government should update the EOTAS guidance and framework for action, to ensure that a full-time offer of education is maintained for those receiving in-patient treatment, whenever appropriate.</p>	<p>AMBER</p>	<p>Welsh Government have committed to updating this guidance. In their response to the report in March 2024 they said that they “<i>will update the Supporting learners with Healthcare Needs guidance to set out duties on local authorities, including the expectation that EOTAS pupils receive around 5 hours per day of education, other than when this is not in their best interest.</i>”</p> <p>This is welcome and we look forward to seeing further details of this work, however at the time of writing no further details have been shared with us and we urge Welsh Government to progress this work.</p>