

## **Barnardo's consultation response: Child poverty strategy September 2023**

### **Introduction**

Barnardo's Cymru has been working with children, young people and families in Wales for over 100 years and is one of the largest children's charities. We currently run more than 60 diverse services across Wales, working in partnership with local authorities. Each year we regularly support more than 10,000 children, young people and families. We aim to secure better outcomes for more children by providing the support needed to ensure stronger families, safer childhoods and positive futures. We use the knowledge gained from our direct work to campaign to improve the lives of children, young people and families by promoting positive change in policy and practice. We believe that with the right help, committed support and belief all children can fulfil their potential.

We are grateful for the opportunity to respond to this consultation and share our knowledge and recommendations for action to address child poverty in Wales. Barnardo's Cymru is embedded in communities across Wales. Every day, we work with children, young people, and families on the issues most affecting their lives. This gives us detailed insight into how poverty and the cost-of-living is playing out for thousands of families across Wales.

We are pleased to see that Child Poverty is an urgent and ongoing priority for Welsh Government and that there are many impactful initiatives and policies being developed and rolled out to support children, young people and families on low incomes or who are struggling to make ends meet. We are particularly pleased to see Welsh Government leading the way in its roll out of universal free school meals for primary aged children, the commitment to baby bundles to support new parents and the scoping work around Welsh benefits.

We recognise that many of the levers to address poverty sit with the UK Government and that Welsh Government has had to make difficult decisions in the current economic climate. However, we believe more could be done to reduce the number of children and young people living in poverty in Wales; ensuring funding is better targeted towards those who need it most. We feel that the draft strategy, unfortunately, lacks ambition along with actions to support the objectives as well as any sort of monitoring framework. Therefore, rather than being a strategic document, is a report that predominantly lists current government policies.



Whilst we are pleased to see that nearly 1400 children and young people were engaged with as part of the strategy development. The strategy would benefit from detailing how children and young people will be engaged with in the future and ongoing as the strategy is implemented.

We know that child poverty in Wales is getting worse<sup>1</sup>. Over a third of children (34%) in Wales are living in poverty<sup>2</sup> - the highest proportion of any UK nation<sup>3</sup>. Barnardo's Cymru has a long history of working with families in Wales, many of whom are experiencing poverty, and we deliver a number of interventions including wraparound support for managing debt and arrears and supporting the whole family. Whilst we have significant experience of working in this area, the number of families, and the severity of the problem is more acute than we have experienced for some time.

Earlier this year, Barnardo's Cymru published a cost-of-living briefing<sup>4</sup> that set out short-, medium- and long-term recommendations for Welsh Government to address poverty and the impact of the cost-of-living crisis. Our suggested priorities are:

1. An action plan to accompany the child poverty strategy with objectives that have clear outcome/impact targets along with indicators to monitor progress.
2. Prioritise mental health and particularly a whole family approach
3. Implement a Welsh Government cost of living crisis fund to enable organisations and individuals to access funds for people facing immediate and significant hardship.

We are pleased to see the priority areas within this draft strategy are drawn from the Welsh Centre for Public Policy (WCPP)'s research into Poverty and Social Exclusion. Being rooted in evidence, we agree that they are the right areas to concentrate efforts to tackle poverty in Wales. However, we also note the WCPP's sentiment that this strategy must be 'more than a policy intervention list.' The current iteration of this draft Child Poverty strategy fails to meet this.

Added to this, we note the lack of clarity around how these objectives will be implemented. We also note the lack of any outcome or impact targets as well as indicators or benchmarking which could measure progress for each objective. There is little explanation around funding, commissioning or implementation of these priorities and we would be grateful to

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<sup>1</sup> [Measures of poverty: April 2020 to March 2021 | GOV.WALES](#)

<sup>2</sup> [Measures of poverty: April 2020 to March 2021 | GOV.WALES](#)

<sup>3</sup> [Wales 'has highest child poverty rates in UK' says Save The Children - BBC News](#)

<sup>4</sup> [Barnardo's Cymru briefing on the deepening impact of poverty and the cost-of-living crisis on children, young people and families in Wales - ENGLISH.pdf \(barnardos.org.uk\)](#)

understand how the Welsh Government seeks to ensure that these priorities are delivered at pace.

There are further considerations around workforce and budgetary constraints which we understand may place considerable difficulties on actioning some of these objectives and priorities. It is important that we understand how this will be mitigated in order for Welsh government to deliver the objectives and priorities that have been set out in this draft strategy.

We urge for an action plan be produced and published which addresses the implementation element of these priorities and provides detailed timescales within which Welsh Government will deliver the objectives set out in this draft strategy.

### **Consultation questions**

#### **Q1 – Do you agree that the introduction to the draft strategy is clear and accessible?**

Whilst we welcome the high levels of engagement conducted throughout the development of this draft strategy; it isn't immediately clear how this engagement has been drawn on to produce this draft. Despite the 'what we heard' sections, the actions that follow do not always cover the priorities raised by participants. In addition, despite highlighting in the introduction, the groups who are more at risk of poverty e.g., lone parents and families whose head of household comes from an ethnic minority group, the rest of the strategy does not draw out how these groups will be particularly supported.

We would have liked to have seen more published feedback from the engagement sessions. Despite this, we are pleased to note the significant work undertaken to ensure that the engagement reached many across Wales and that it took an intersectional approach.

#### **Q2 - In considering the requirement under the Children's and Families (Wales) Measure for the Welsh Government to set objectives for the contribution towards the eradication of child poverty, do you agree that Objective 1 should be an objective of the draft strategy? Is the information about what we have heard and what the Welsh Government doing in relation to Objective 1 clear and accessible?**

We know that the current cost-of-living crisis has exacerbated the impact of poverty. In February 2023, Barnardo's conducted representative polling of 1000 parents in Great Britain with YouGov2. 61% of parents surveyed in Wales told Barnardo's that over the last four months their financial

situation has declined and that they are struggling with the rising costs of energy and food bills.

We are pleased that Welsh Government is prioritising entitlement and building on its work to deliver the income maximisation work and development of a Welsh Benefits system. This is a Barnardo's Cymru priority. We have been a supporting partner in the Bevan Foundation and Policy in Practice's project, which shows that a Welsh Benefits System is both desirable and feasible. Whilst the Welsh Government has sought to introduce benefits, grants and entitlements of its own where the devolved settlement allows, each of these is administered separately meaning separate applications. For many families there can often be a challenge in understanding eligibility and completing each of the applications, meaning that families could be missing out on vital funds. A common approach utilising a single point of access could mitigate some of the issues for families and ensure that more money is in the pockets of those who need it most. We need to make claiming easier and simpler to ensure we maximise the benefits received by eligible families.

We recognise the work that the Welsh Government is currently undertaking towards a solution to this issue.

### **Free school meals**

Our services have seen a rise in families struggling to feed their children<sup>5</sup>. Whilst we welcome the rollout of free school meals across Wales for primary aged school children, we were extremely concerned to see the pausing of this offer over the 2023 summer holidays, and at such late notice.

We know that the cost-of-living has significantly impacted families and this does not stop after primary school, and so urge this provision be extended universally to all secondary school pupils. Our report found that families are struggling with the cost of food and 61% of parents polled in Wales said their financial situation has declined<sup>6</sup>.

Barnardo's Cymru practitioners are incredibly anxious about the families that they support and are struggling with how to support them. One member of staff said:

'This is not something families can budget their way out of, it has become a way of life. Even the smallest treats – such as a magazine for children – don't exist anymore. We are trying to help people stretch their money as

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<sup>5</sup> [Barnardo's Cymru briefing on the deepening impact of poverty and the cost-of-living crisis on children, young people and families in Wales - ENGLISH.pdf \(barnardos.org.uk\)](#)

<sup>6</sup> [Barnardo's Cymru briefing on the deepening impact of poverty and the cost-of-living crisis on children, young people and families in Wales - ENGLISH.pdf \(barnardos.org.uk\)](#)

far as possible, all to cover just the most basic of needs. It isn't good enough.'

## **Foster Carers**

We are pleased to note that the draft strategy intends to work alongside Foster Wales to decide on a new structure and payment levels for the National Minimum Allowance for foster carers, so that foster caring does not result in financial disadvantage for carers.

We support the financial inclusion of kinship carers set out in the Radical Reform Summit Declaration<sup>7</sup> and encourage the Welsh Government to move swiftly to implement this to ensure kinship carers are not financially disadvantaged.

## **Basic income pilot**

We welcome the Basic Income Pilot and the potential this has to prevent care-experienced young people from experiencing poverty early in their adult lives, and look forward to engaging with its assessment and thinking behind how it may be taken forward beyond the pilot period. However, we would ask for more detail around the ending of this pilot to ensure that the young people included are supported in the longer term. There is evidence that young people who leave care are more likely to be unemployed in their 20's<sup>8</sup> and more likely to struggle financially. Whilst many young people may be able to live in parental care into their 20s and beyond, we know that care leavers are expected to live independently from the age of 18 or earlier<sup>9</sup>. In addition to the Basic Income Pilot, we would urge Welsh Government to take a whole-person approach to supporting care leavers to manage their finances and the early years of living independently.

## **EMA uplift**

We were pleased to see the long-called for uplift to Education Maintenance Allowance (EMA) earlier this year, from £30 to £40 and we welcome a further review of this payment. Despite this uplift, young people have previously told us that £20 of this is currently spent on travel<sup>10</sup> and we would encourage Welsh Government to introduce free bus and train travel for under 18s, and under 25 for those leaving care. We

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<sup>7</sup> [Radical Reform Summit: Declaration \(gov.wales\)](https://www.gov.wales/radical-reform-summit-declaration)

<sup>8</sup> [FileNewTemplate \(wcpp.org.uk\)](https://www.wcpp.org.uk/file-new-template)

<sup>9</sup> *No Place Like Home: a look at young people's experiences of leaving the care system*

<https://www.barnardos.org.uk/sites/default/files/2021-05/No-Place-Like-Home-Report-IKEA.pdf>

<sup>10</sup> [Barnardo's Cymru briefing on the deepening impact of poverty and the cost-of-living crisis on children, young people and families in Wales - ENGLISH.pdf \(barnardos.org.uk\)](https://www.barnardos.org.uk/sites/default/files/2021-05/Barnardo%27s%20Cymru%20briefing%20on%20the%20deepening%20impact%20of%20poverty%20and%20the%20cost-of-living%20crisis%20on%20children%2C%20young%20people%20and%20families%20in%20Wales%20-%20ENGLISH.pdf)

believe this could mitigate against the proportion of EMA being used solely for travel, bring Wales more in line with Scotland<sup>11</sup>, tackle climate change and ensure that any further EMA uplift is available to support young people where they need it.

We would further raise the fact that EMA is currently based upon attendance, which for young carers can be severely hampered by their caring responsibilities. Young carers tell us that they feel penalised compared to their peers when they miss out on vital payments because of lateness or absence that is attributable to their caring role. We would welcome any work Welsh Government could do to review and make changes to EMA to create a fairer playing field for young carers.

### **Baby Bundles**

Through our work with vulnerable families, we understand the costs associated with a new baby. We also know that all babies deserve the best start in life. We are pleased that this draft strategy includes the commitment to a universal rollout of baby bundles, in line with the Programme for Government<sup>12</sup>. The introduction of baby bundles will go some way to ensure that all babies begin their life with the essentials they need, creating a baseline and ensuring that new parents are supported. We look forward to the appointment of a supplier to deliver this project in the coming months<sup>13</sup>.

### **Q3 – Do you agree that Priority 1 should be a priority for the draft strategy?** Priority 1: entitlement (putting money in people’s pockets)

Yes, we agree that Priority 1: ‘entitlement’ - putting money in people’s pockets – is an important priority in tackling poverty. We recognise that this element came through strongly in both the evidence base and engagement work undertaken to develop the draft strategy and we agree that it should be included. One of our key recommendations to address child poverty is the need for a Welsh benefits system to ensure that people can access the money they are entitled to, and we are pleased to see continued work to explore this and support those most impacted by financial challenges.

### **Q4 - In considering the requirement under the Children’s and Families (Wales) Measure for the Welsh Government to set objectives for the contribution towards the eradication of child poverty, do you agree that Objective 2 should be an objective of**

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<sup>11</sup> [Free bus travel for under 22s - gov.scot \(www.gov.scot\)](https://www.gov.scot)

<sup>12</sup> [Welsh Government - Programme for Government - Update](#)

<sup>13</sup> [Plenary 17/05/2023 - Welsh Parliament \(senedd.wales\)](#)

## **the draft strategy? Is the information about what we have heard and what the Welsh Government doing in relation to Objective 2 clear and accessible?**

**Objective 2:** to create pathways out of poverty so that children and young people and their families have opportunities to realise their potential.

### **Best start in life**

Whilst this objective suggests a renewed focus on expanding the Flying Start programme, there is little detail to explain *how* this will be expanded. There are ongoing concerns, for example, around the early years workforce and recruitment and retention.

In respect of the childcare offer for Wales, we would encourage the Welsh Government to expand free childcare to all two-year-olds, irrespective of their parents' employment or training status. The measure of success of free childcare should be focused on outcomes for children and not determined by parental status. We would welcome more detail on the rollout of this offer, specifically around who and when additional cohorts will be included. Childcare remains a significant barrier to employment, and therefore a key driver to ensuring parents, especially women, can access, and remain, in paid work.

### **Transport & travel**

Young people have told us that the cost of travel can be a barrier to opportunity. As previously mentioned, travel can take up a significant proportion of any EMA payment they are entitled to. Young people have also told us they are noticing the increased cost of public transport and that this is causing worries and ultimately fewer opportunities to leave home, see friends and get out and about<sup>14</sup>. This draft strategy refers to the Wales transport strategy for Wales, *Llwybr Newydd*, which states that it aims to reduce the cost and improve the accessibility of sustainable transport for everyone in Wales, including students. However, it does not outline any support for travel costs in that strategy, either for children and young people or for care leavers, as highlighted as a need by participants in the engagement narrative. We would urge the Welsh Government to introduce free bus and train travel for young people to support their educational, social and work prospects and to ensure that transport costs are not holding them back.

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<sup>14</sup> [Barnardo's Cymru briefing on the deepening impact of poverty and the cost-of-living crisis on children, young people and families in Wales - ENGLISH.pdf \(barnardos.org.uk\)](#)

## Education & progression

A study<sup>15</sup>, commissioned by the Co-op and Barnardo's has found that children and young people aged between 10 and 25 in Wales are almost twice as likely, at 40%, to worry about job opportunities compared to 23% of those living in London. The study also found that only 60% of young people in Wales believe they can achieve their dream job. While 26% of children and young people asked stated that they are focused on getting a job that will make them "quick and easy" money. This is concerning.

We welcome the ambition to '*Ensure educational inequalities narrow and standards rise*' through the 'Stronger, fairer, greener Wales: a plan for employability and skills' policy<sup>16</sup>. We particularly welcome the 'national employability support to target young people'. Nonetheless we encourage the Welsh Government to go further in this support and recognise that young people are not a homogenous group and require different levels of support into employment due to their different life experiences and backgrounds. We would welcome further explanation of the support available for groups such as young carers, those with a disability and care experienced young people to overcome the barriers they face in entering and remaining in the workforce.

### **Question 5: Do you agree that Priority 2 should be a priority for the draft strategy?**

#### **Priority 2: Creating a Fair Work nation (leaving no one behind)**

Yes, we agree that Creating a Fair Work nation should be a priority for the draft strategy.

**Question 6: In considering the requirement under the Children's and Families (Wales) Measure for the Welsh Government to set objectives for the contribution towards the eradication of child poverty, do you agree that Objective 3 should be an objective of the draft strategy?** Is the information about what we have heard and what the Welsh Government doing in relation to Objective 3 clear and accessible?

**Objective 3: to support child and family wellbeing and make sure that work across Welsh Government delivers for children living in poverty, including those with protected characteristics, so that they can enjoy their rights and have better outcomes.**

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<sup>15</sup> [Young people in Wales 'least optimistic' about job prospects - Business Live \(business-live.co.uk\)](https://www.business-live.co.uk/news/young-people-wales-least-optimistic-about-job-prospects-102525)

<sup>16</sup> [Stronger, fairer, greener Wales: a plan for employability and skills: summary \[HTML\] | GOV.WALES](https://gov.wales/stronger-fairer-greener-wales-a-plan-for-employability-and-skills-summary)



## **Ending homelessness in Wales**

We recognise the ambition to ensure that there are early intervention and targeted prevention measures currently in place to prevent care experienced young people from becoming homeless. Whilst these are welcomed, it is becoming more difficult for young people to rent privately, and care leavers face the additional barrier of having to be independent from an earlier age. They often find difficulty securing accommodation without financial support from family or a parent or guardian to act as a rent guarantor. Whilst care leavers between 18 and 21 are accepted as priority need, there are many other individuals who also fall into this category and there is increasingly limited emergency, temporary and long-term housing. We are concerned about long waiting lists. We would encourage Welsh Government to further embed targeted prevention for care leavers and care experienced young people recognising their unique experiences and barriers to prevent young people from falling through the cracks.

We note the Radical Reform Summit Declaration commitment to ensure that no young person will ever be homeless when they leave care and that they will be supported to live in comfortable home and to keep that home<sup>17</sup>. We support this pledge as a vital element of ensuring care experienced young people are able to live safely and independently, however we would like to see further detail around the implementation of this commitment. There must be particular focus on multi-agency wraparound support and implementation through local authorities to ensure consistency and trauma-informed ways of working recognising the unique needs of those young people with care experience.

In addition, given that Welsh Government has pledged to legislate by the end of this Senedd term for care leavers to be given a personal advisor up to the age of 25, which Barnardo's Cymru supports, there should be better integration of how the homelessness strategy will interact with this pledge, including appropriate practitioner training for those supporting care leavers to begin living independently.

Barnardo's Cymru would like to see a greater emphasis on education and support within the plan, providing care leavers and vulnerable young adults with the tools to help protect them from the risk of homelessness. This should include an emphasis on training, education, and skills. This would include support on budgeting, financial planning and understanding the benefits system and other means of support that are available to them. Many of these are implemented by Barnardo's Cymru services to support care leavers into independence and financial security.

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<sup>17</sup> [Radical Reform Summit: Declaration \(gov.wales\)](https://gov.wales/radical-reform-summit-declaration)

More detail is also needed on the support for families who become homeless. As previously highlighted, there is a lack of accommodation available due to high demand and for families, a lack of suitable accommodation can be detrimental to their networks, mental health and ability to work and keep their children in school. This needs to be addressed urgently.

## **Supporting Families**

The strategy promises to “think community when developing, reviewing and funding relevant policies and programmes including Families First guidance”. However, we believe Welsh Government needs to urgently address the pressures on Families First services and budgets across Wales. As the draft strategy states, the intention of Families First services is to ‘offer early support with the aim of preventing problems escalating’. However, due to rising statutory thresholds, increasing demand and the complexity of need which families are experiencing, in many places Families First now effectively occupies an edge of care role. This potentially leaves a gap where there should be support for families who require an early intervention or prevention response. However, Families First services continue to have to respond to early intervention/prevention cases, a demand that has increased severely through the pandemic and Cost of Living Crisis. Added to this, the impact of inflation on the delivery of Families First provision is also having a severe impact on the ability of teams to meet high levels of need in the community. With no uplift to many contracts for several years, services have seen real term cuts.

As an example, Barnardo’s Cymru is the sole agency delivering the Families First team around the family co-ordination/response across one local authority area. Whilst we have seen an increase in complex cases (mental health issues and issues of domestic violence primarily), this service to a large degree, continues to be preventative. Nevertheless, referral demand for this service increased by over 40% in 2022/23, inflationary costs equated to approximately 8% for service, yet the Families First uplift for 2023/24 equated to less than 2%. In addition, Welsh Government additional funding to meet ‘pandemic waiting lists’, which provided two extra workers was withdrawn from April 2023. In 2022/23 the service had to access in excess of £90k from our internal crisis fund and grants as well as other grant making bodies in order to help families and children in crisis – particularly with food and energy. However, we are very concerned that these additional grant making funds are reducing or being removed altogether.

Barnardo’s Cymru calls on the Welsh Government to review Families First provision, the stress points most acutely affecting delivery, and how provision can be invested in for the future. In addition, we believe Welsh

Government must implement a cost-of-living crisis fund, similar to that in Scotland, to enable organisations and individuals to access funds for people facing immediate and significant hardship. Furthermore, an inquiry into the cost-of-living crisis and how this exacerbates pre-existing family issues should be explored.

### **Whole family approach to mental health and wellbeing**

As Barnardo's Cymru has long called for, and the Wales Centre for Public Policy (WCPP) research highlights, the need to address the links between poverty and poor mental health should be prioritised. For children and young people, a key factor that influences their mental health and wellbeing is their family network. Care and treatment plans for children cannot exclude those that care for them and who can both affect and be affected by their mental health and wellbeing. This is reflected in our own Cardiff Family Wellbeing service which utilises a whole-family approach and we would strongly encourage further rollout of this model. The family network is a wider determinant of children's mental health and wellbeing.

We believe that this approach is vital in order to support families and better the provision of mental health support for children and young people across Wales.

Part of this support must also consider the accessibility of services. In more rural areas of Wales, being able to physically access support services can be a challenge. This is tied to issues related to poverty – if a young person can arrange an appointment, do they have a car to access it? Can they afford the public transport to get there? The needs of young carers, who face additional barriers to accessing support and wellbeing, must also be considered. We would like to see more focus on alleviating these barriers and consideration of access for children and young people who may be unable to afford to travel or leave their homes for a myriad of reasons including the impact of poverty and/or caring obligations. This could include the provision of a hybrid or digital offer which would give young people more choice and flexibility to access services such as early help or CAMHS and may reduce the financial impact of accessing in person services.

We look forward to the development of a new Mental Health Strategy for Wales along with further opportunities to engage and link in the children, young people and families we work with as this work progresses.

**Question 7:** Do you agree that Priority 3 should be a priority for the draft strategy?

### **Priority 3: building communities (accessible, joined up services to meet community needs)**

Not responding

**Question 8** - In considering the requirement under the Children's and Families (Wales) Measure for the Welsh Government to set objectives for the contribution towards the eradication of child poverty, do you agree that Objective 4 should be an objective of the draft strategy?

Is the information about what we have heard and what the Welsh Government doing in relation to Objective 4 clear and accessible?

**Objective 4: to ensure children, young people and their families are treated with dignity and respect by the people and services who interact with and support them and to challenge the stigma of poverty.**

#### **Due regard to the UNCRC**

Article 12 of the UNCRC states that children have the right to be listened to and taken seriously and is one of the core principles of the Convention. It is heartening to see that nearly 1400 children and young people were engaged with as part of the development process. However, the strategy lacks a child's rights approach. For example, the UNCRC also covers a range of other human rights protections for children and young people and the strategy would have benefitted from linking more explicitly with them throughout. Added to this, there is no reference to the concluding observations to the UK, published in June, that makes recommendations to government, including on tackling child poverty<sup>18</sup>.

#### **Delivering services with kindness and compassion**

We have raised our concerns previously that there can be a stigma experienced by those experiencing poverty particularly when accessing services such as foodbanks. There can often be further discrimination faced for families from black, asian and minority ethnic backgrounds, as

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[tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGBR%2FCO%2F6-7&Lang=en](http://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGBR%2FCO%2F6-7&Lang=en) - see paragraph 46, "Noting with deep concern the large number of children living in poverty, food insecurity and homelessness, the Committee recommends that the State party: (a) Develop or strengthen existing policies, with clear targets, measurable indicators and robust monitoring and accountability mechanisms, to end child poverty and ensure that all children have an adequate standard of living...").

well as LGBTQIA+ families and young people some of whom we support. This can be through support services not being able to meet their needs or negative experiences of poor treatment due to discrimination.

We welcome the approach outlined to 'ensure that all services are non-judgemental, kind and compassionate and promote resilience' and that a trauma informed way of working should be the standard across all services. We also welcome the work of the Wales Anti-Racist plan to tackle racism and stigmatisation in service delivery and are pleased to see the further development of the LGBT Action Plan. Further to this, we would encourage there to be more recognition and understanding of those children and young people who may not have a specific protected characteristic but may be care experienced, young carers or with neurodevelopmental challenges, to ensure they get the right support and that their specific barriers are recognised and they are able to access services which meet their needs.

We would encourage Welsh Government to work to ensure that no child is removed from the family for the principal reason of material neglect due to poverty. Research in Wales has found direct correlation between deprivation levels of a geographic area and the number of looked after children in the same area.<sup>19</sup> More worryingly this research highlights a 42% increase in rates of children entering the care system between 2008-2009 in the most deprived neighbourhoods whilst rates in the least deprived neighbourhoods fell or remained the same.

The research also showed that the increase in numbers of children entering care were predominantly from families with younger children<sup>20</sup>. Supporting families through early intervention, at the most critical periods, is crucial. We believe that there must be swift action taken to identify and support families where financial assistance is urgently needed. This must include social workers and family support colleagues across Wales being able to draw on emergency funding to pay for simple necessities like clothing, food, furniture, and fuel.

**Question 9:** Do you agree that Priority 4 should be a priority for the draft strategy?

Families in poverty should not face discrimination because of their socio-economic status, neither should they face additional discrimination or stigma because of their protected characteristic, background, care experience or carer status. Considering child poverty through an

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<sup>19</sup> [Child Welfare Inequalities in a Time of Rising Numbers of Children Entering Out-of-Home Care | The British Journal of Social Work | Oxford Academic \(oup.com\)](#)

<sup>20</sup> [Child Welfare Inequalities in a Time of Rising Numbers of Children Entering Out-of-Home Care | The British Journal of Social Work | Oxford Academic \(oup.com\)](#)

intersectional lens is important and addressing stigma and discrimination within services is paramount.

**Priority 4: inclusion (kind, compassionate and non-stigmatising services)**

Non-discrimination of care experienced children and young people, young carers, children with additional needs and their families is crucial. There must be access to services that meet the needs and compassionately address the barriers for these children, young people and their families which is imperative in developing a child poverty strategy for all.

**Question 10: In considering the requirement under the Children's and Families (Wales) Measure for the Welsh Government to set objectives for the contribution towards the eradication of child poverty, do you agree that Objective 5 should be an objective of the draft strategy? Is the information about what we have heard and what the Welsh Government doing in relation to Objective 5 clear and accessible?**

**Objective 5: to ensure that effective cross-government working at the national level enables strong collaboration at the regional and local level.**

Partnership approaches to support families living in poverty are essential. A good example of this is our Newport Partnership which has proved hugely successful. The core element of the partnership is a multi-disciplinary approach between Barnardo's Cymru as the third sector, and Newport County Council as the statutory service. Working together can improve engagement and build trust with and for families.

Collaborative working throughout governmental departments can provide multi-agency answers to tackling poverty. We note where this draft strategy has raised policies which incorporate different departments. It is important that these are implemented in a joined-up way and are truly collaborative.

Similarly, this can be replicated across local authorities and the third sector which can support innovative delivery of local services which are able to meet the needs of children, young people and their families across Wales.

**Question 11: Do you agree Priority 5 should be a priority for the draft strategy**

**Priority 5: enabling collaboration (at the regional and local level)**

Whilst we agree on the importance of the socio-economic duty and the enabling of collaboration at a regional and local level, we think these elements should instead be incorporated through-out the draft strategy and encompassed in the other priorities. They are essential to the delivery of priorities 1, 2 and 3, to ensure that the Welsh Government, public bodies and partners are working collaboratively throughout their work in these areas.

**Question 12:** Do you agree that the section setting out how we will monitor and report on our progress is clear and accessible?

We are disappointed that the strategy doesn't include a monitoring and evaluation framework. This draft strategy states that Welsh Government will 'seek independent research advice on suitable national poverty indicators, data availability and a framework to monitor and demonstrate transparent accountability in reporting on our tackling poverty progress and on involving people with lived experience in telling us whether we are achieving'. However, a draft strategy should include these vital elements in the first place. Without these, the strategy remains incomplete.

We note the lack of clarity around how these objectives will be implemented. We also note the lack of any outcome or impact targets as well as indicators or benchmarking which could measure progress for each objective. There is little explanation around funding, commissioning or implementation of these priorities and we would be grateful to understand how the Welsh Government seeks to ensure that these priorities are delivered at pace.

As highlighted above, we urge Welsh Government to provide an action plan to accompany the child poverty strategy including clear, measurable actions and timescales under each objective.

### **Question 13**

Does the Child Poverty Strategy adequately respond to the intersection between child poverty with protected characteristics (such as ethnicity, gender, disability and sexuality) and the experience of socio-economic disadvantage.

The engagement work undertaken to inform this draft strategy successfully engaged young people from different backgrounds, including care leavers, however the conclusions from this engagement work are not always addressed throughout the draft strategy. Despite neither care leavers, young carers, nor children with Adverse Childhood Experiences (ACEs) being a protected characteristic under the Equality Act, we know that there are additional cross-cutting challenges for these young people.

This draft strategy does not address these vulnerabilities or highlight the specific mechanisms that will be used to mitigate these challenges. We welcome some of the policy developments set out to support care leavers, such as the Basic Income Pilot, however one policy is not a catch all.

For parents with disabilities, statsWales most recent statistical information shows that for families with a household member with a disability, the child(ren) are more likely to be in relative income poverty. FYE 2020 to FYE 2021, the risk of being in relative income poverty was 31%<sup>21</sup> for children in a family with a household member with a disability compared to 26% of children in a household where no one has a disability.

Additionally, the risk of being in relative income poverty for a couple with children is 25% compared to 39% for lone parents (FYE 2020 – FYE 2022)<sup>22</sup>. As previously raised, despite having this information, there is limited inclusion in the draft strategy of specific policy interventions for lone parents, who are, statistically more likely to be women, to ensure they are not financially disadvantaged and can enter and remain in the workplace.

#### **Question 14**

We would like to know your views on the effects that the Child Poverty Strategy proposal would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

It is vital that support for families experiencing poverty is available in Welsh and English so that no family, parent, child or young person is disadvantaged or unclear of their options, financial entitlements or rights due to their language needs.

In order to provide this there must be investment in services offering Welsh language provision, and the individuals in the workforce, who support families across Wales to ensure that the right support is available and accessible to those struggling.

#### **Question 15**

We would like to know your views on the Integrated Impact Assessment.

#### **Question 16**

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<sup>21</sup> [Children in relative income poverty by whether there is disability in the family \(Equality Act definition\) \(gov.wales\)](https://gov.wales)

<sup>22</sup> [Children in relative income poverty by family type and work status \(gov.wales\)](https://gov.wales)



We would like to know your views on the Child Rights Impact Assessment.

### **Question 17**

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:

Barnardo's Cymru works across Wales to support children, young people and families. Our most recent data from services highlighted significant numbers of families experiencing poverty and needing support<sup>23</sup>. This draft child poverty strategy, whilst setting out many positive inter-dependent strategies, does not go far enough. We ask that the work started here is developed further to stop families falling through the cracks.

We, as an organisation, work tirelessly to provide this support through many interventions such as debt advice, our Children's Emergency Fund<sup>24</sup> and supporting access to foodbanks. We are deeply concerned about the rising numbers of families needing this support and seek to work with the Welsh Government to prevent families slipping deeper into crisis.

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<sup>23</sup> [Barnardo's Cymru briefing on the deepening impact of poverty and the cost-of-living crisis on children, young people and families in Wales - ENGLISH.pdf \(barnardos.org.uk\)](#)

<sup>24</sup> [Thanks for being there for children in their most vulnerable moments | Barnardo's \(barnardos.org.uk\)](#)