



Llywodraeth Cymru
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Consultation – summary of response

Child Poverty Strategy for Wales

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Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

Overview

The Welsh Government undertook a consultation on a draft Child Poverty Strategy for Wales, and on the 5 Objectives and 5 Priorities in the strategy. The strategy sets the direction for Welsh Government actions to tackle child poverty over the next decade or more and to meet our ambitions for children and young people in Wales, no matter what their circumstances or background. It also provides a framework to maximise the levers we have at our disposal to make our contribution to eradicating child poverty.

Action Required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: <https://www.gov.wales/draft-child-poverty-strategy-wales-2023>

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Introduction

This report summarises the responses to the consultation entitled [Draft Child Poverty Strategy for Wales](#). The results and analysis have informed changes and amendments to a final Child Poverty Strategy for Wales.

The draft strategy that we consulted on was itself informed by evidence from engagement with 3,272 people with lived experience of poverty and the people who support them.

Pre-consultation engagement exercise

In order to develop a draft Child Poverty Strategy for consultation, we wanted to hear from children and young people, their families with lived experience of poverty and the organisations that support them. We wanted to know what matters to people with experience of poverty about where they think we can make the biggest difference.

We provided funding, working with our partners to enable engagement events in the communities where people live, delivered by organisations that people know and trust. This was especially important in relation to engaging people with protected characteristics, including Black, Asian and minority ethnic people, disabled and neurodivergent people, LGBTQ+ people and women receiving support because of gendered issues.

The engagement activity has involved engagement with 3,272 people. 1,953 of these people engaged via work targeted at those with protected characteristics. Of the total, 1,402 were children or young people, 1,329 were parent/carers and 319 were grandparents and great grandparents. This has included care experienced young people and kinship carers. We also engaged with 222 representatives of organisations directly or indirectly.

We asked people to talk about 4 areas and to tell us if there was anything else we needed to think about. We have produced a report '*What we have heard*' which shares more detailed information about the things that children and young people, parent/carers and organisations told us. The information gathered through this engagement activity had a direct impact on our decisions about what to include in the draft Child Poverty Strategy on which we consulted.

External Reference Group

The Steering Group of the End Child Poverty Network (ECPN) agreed to act as an External Reference Group as we developed the draft for consultation. The End Child Poverty Network (ECPN) Cymru is a coalition of organisations focused on the eradication of child poverty in Wales, co-ordinated and managed on a day-to-day basis by Children in Wales. Its Steering Group includes representation from across

the voluntary and statutory sectors, and the wider network has over a 1000 supporting members from a broad cross-section of agencies.

The External Reference Group met with Welsh Government officials in March, April, and May 2023 as we developed the draft strategy for consultation. The Minister for Social Justice and Chief Whip met with the External Reference Group in September just before the consultation closed. We are grateful for the role members have played as ‘critical friends.’

Promoting the consultation

The Minister for Social Justice and Chief Whip undertook a programme of visits across Wales over the summer, using this as an opportunity to promote the consultation. The Minister also visited Bonymaen Family Cwtch, Faith in Families, EYST, Swansea and Twyn Community Hub, Merthyr Tydfil to directly discuss the consultation with and listen to families and staff.

Following the launch of the consultation in June, Welsh Government officials attended a number of regional network meetings and events to promote the consultation and discuss the consultation with participants.

The consultation was also widely promoted electronically via relevant networks and with the organisations who undertook pre-consultation engagement activity. A number of national organisations promoted the consultation on their websites.

Response to the consultation

We received a total of 155 consultation responses, 14 of these responses were from UK organisations the majority of whom operate in Wales, and 141 responses were from individuals and organisations in Wales.

This included responses from third sector organisations (22%), local authorities (14%), individuals/anonymous (18%), health organisations (13%), education settings/bodies (10%), early years/childcare organisations (5%), networks/stakeholder groups (5%).

The other 13% of responses included responses from Devolved Public Bodies, Non-Departmental Public Bodies (NDPB), faith groups/religious organisations, Housing Associations, Unions, food organisations and a transport organisation.

Summary of responses

The following section details a summary of the responses received in relation to the consultation questions and Welsh Governments responses.

Some respondents did not complete all the questions in the consultation response form. Some respondents did not use the consultation form or provide ‘yes’ ‘no’ or ‘unsure’ responses. This means that the total numbers recorded in the table below

do not add up to 155. However, all responses have been considered equally in terms of comments received.

This report forms a summary of all the responses received through the consultation and explains the Welsh Government response to the issues raised.

The following terms are used to indicate the relevant number of responses:

- 'most'- more than 70%
- 'majority' – more than 50%
- 'around half'- between 45-55%
- 'minority' – less than 50%
- 'few' – less than 20%
- 'very few' – less than 10%

A total of 24% of respondents asked us to keep their response anonymous, evidence and quotes have not been attributed to these respondents.

Do you agree that the introduction to the draft strategy is clear and accessible?

A total of 121 respondents provided 'yes', 'no' or 'unsure' answers to this question, with most agreeing that the introduction is clear and accessible. The analysis included in the summary includes evidence from those who did not answer in this way but provided comments.

Yes 94 (77%) No 8 (7%) Don't know/Unsure 19 (16%)

Summary

A total of 77% respondents agreed that the introduction is clear and accessible.

'Clearly presented background information, introducing Child poverty, the Well-being of Future Generations Act and the inclusion of people and communities in the strategy.' (Health organisation)

The introduction to the draft strategy is presented clearly. It reads well and all the elements to be expected, illustrating a number of different strands that have come together. (Local Authority)

Some people also commented on this question to indicate their view that the strategy is needed and welcomed.

'We believe the strategy is much needed to address the inequalities across Wales and the opportunities that children, young people and families can access.' (Stori)

A majority of respondents used their answer to this question to make general or overarching comments on the strategy. There were a number of emerging themes.

Just under one quarter (23%) of respondents felt that the strategy should have stronger content on children's rights, including direct reference to the articles of the UNCRC.

'The introduction does highlight the UN Convention on the Rights of the Child and speaks to the due regard duty when discussing the evidence base in relation to gathering children and young people's views under that duty. This is very much welcome. However, the introduction itself should also point to the due regard duty under the Rights of Children and Young Persons (Wales) Measure 2011, and the Welsh Government's commitment to the Convention, as a driver for combating the experience of living in child poverty as an egregious breach of human rights. Welsh Government has a duty to tackle child poverty under the Measure in order to demonstrate due regard for children's rights, and this should be explicit. Each objective should link to specific articles of the UNCRC, and how the strategy supports that right.' (Children's Commissioner for Wales)

'Although some UNCRC article were referenced, these have not been considered and examined alongside any proposed policies to reduce child poverty. NYAS Cymru is concerned that that this list of UNCRC rights has only been termed as a CRIA so the Welsh Government can fulfil this statutory entitlement under section 1 of the Rights of Children and Young Persons (Wales) Measure 2011.' (NYAS)

A few respondents talked about the need for the strategy to have a more ambitious tone and better communicate the Welsh Government's vision and aspirations for tackling child poverty.

'We suggest that the draft strategy sets out a clear and stronger vision at the onset of the document, which is aspirational, confident and decisive in tone, and which demonstrates far greater ambition and determination to achieve a Wales free from child poverty.' (End Child Poverty Network)

Overall, 21 (13%) of responses were from health service organisations, the majority of these responses asked that the link between child poverty and health inequalities be clearly set out in the strategy.

'While we welcome the publication of this draft child poverty strategy, especially objective 5 we have serious concerns that it fails to consider the prevention of ill-health across all areas of government, the impact of child poverty on health, and particularly on health inequalities.' (Royal College of Physicians)

A minority of respondents said that the strategy should include national indicators, actions, and milestones, with some calling for a delivery or action plan. A few respondents wanted clarity on the intended life of the strategy, for example, whether it would be a ten-year strategy.

'The lack of any delivery plan, with specific targets/milestones to aim for, in order that progress can be effectively measured. For example, appropriate

medium term targets could be set ahead of the next Progress Report due at the end of 2025.’ (Citizens Advice Bureau).

Objective 1 - To reduce costs and maximise the incomes of families.

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?

Yes 106(92%) No 3 (3%) Don’t know/unsure 6 (5%)

A total of 115 respondents provided ‘yes’, ‘no’ or ‘unsure’ answers to this question, with most (92%) agreeing that Objective 1 should be an objective of the strategy.

Is the information about what we have heard and what the Welsh Government is doing in relation to Objective 1 clear and accessible?

Yes 90(81%) No 9 (8%) Don’t know/unsure 12 (11%)

Of the 111 people who responded to this question most (81%) agreed that the information in relation to Objective 1 was clear and accessible.

Summary

Those who provided further comment on these questions were most likely to reflect the importance of issues already included in the draft strategy such as food poverty, unclaimed benefits, childcare costs, and education costs and to provide further evidence of the very real impact of the cost of living crisis on low income families. A few responses asked that breast-feeding be included as a cost-effective means of feeding babies and supporting their health.

There were also some calls for further funding for services supporting children, young people, and families in poverty and for the Welsh Government to directly supplement the family income.

‘We recommend that the strategy includes a commitment to explore a Welsh ‘child payment.’ Consideration of a payment should include different timings and frequency of payment, targeting at 0–4-year-olds, and possible payment values, as well as options for covering the cost’. (Bevan Foundation).

The Cystic Fibrosis Trust and Marie Curie commented to say that there should be a direct reference to the particular challenges faces by families with a member with continuing health needs or receiving end of life care.

‘We encourage Welsh Government to also include evidence about how terminal illness impacts families with dependent children in the information underpinning this objective.’ (Marie Curie)

The Water Consumer Council asked that we include information on work around water affordability and a respondent also highlighted that the Discretionary Assistance Fund was not referenced.

Many of those who provided further comment on these questions set out that work under objective 1 is important.

'This objective is very much welcomed and is essential as the Cost-of-Living Crisis continues. Children and young people in Cardiff have informed us, through the Cardiff Youth Council, that the Cost-of-Living Crisis is one of their three main priorities.' (Cardiff County Council).

Do you agree that Priority 1 should be a priority for the draft strategy?

Yes 100 (87%) No 5(4%) Don't know/unsure 10 (9%)

Summary

Of the 115 respondents who provided 'yes', 'no' or 'unsure' answers, most (87%) agreed that Priority 1 should be a priority for the strategy.

'There are many positive actions which are being described here.' (School)

Those who provided comment focussed on a few themes, these were: support for the importance of face-to-face information and advice on maximising incomes and reducing costs, the need for Free Schools Meals, decent wages, including in the school holidays, free transport and childcare costs and availability.

'(There are) barriers to claiming, which affect different communities in different ways but can be ameliorated or overcome if face to face advice is available from a trusted organisation. Whilst the problem of underclaiming is widespread affecting many different groups of children and young people, face-to-face advice can have a significant impact when there are language, literacy, and digital barriers.' (Swansea Neath Port Talbot Regional Advice Network Steering Group)

A few respondents also said that more funding is needed for educational settings in order that they can reduce costs for learners.

'We have no school surplus budget to subsidise (school trips) with the exception of the Pupil Deprivation Grant (PDG). However, our PDG is primarily used to fund Teaching Assistants/Family Support Worker which we see as essential to support vulnerable pupils and families.' (Primary School)

Some of the issues raised in response to this question, namely, decent wages, childcare and transport are dealt with under Objective 2. Other issues raised here are already referenced in the strategy.

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

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 the draft strategy?

Yes 107 (94%) No 2(2%) Don't know/unsure 4 (4%)

Of the 113 people who responded, most (94%) agreed that Objective 2 should be an objective of the strategy.

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

Yes 81 (75%) No 10(9%) Don't know/unsure 17 (16%)

People were slightly less likely to agree that the information on Objective 2 was clear and accessible but of the 108 who responded, most (75%) did.

Summary

There was support from most respondents for Objective 2 to be an objective of the strategy. Of people commenting on the information about work under Objective 2 a minority did not agree or were unsure whether this was clear and accessible. The most common reason for this was that people wanted more detailed information about what is being done.

Many of those who commented on this question provided further evidence of the importance of the issues already included in the strategy.

A few people commented to say that the strategy should be explicit about the importance of the first 1000 days and early years support, including issues such as Speech and Language support.

A number of childcare organisations and providers responded to questions on Objective 2, reinforcing the importance of childcare to enable parents to work but also setting out the pressures on providers that provide a challenge to managing fees.

'Quality of care and staff do come with associated costs and the cost of living increases have impacted on clubs with rent and utility hikes, food increases and annual National Minimum Wage increases. 59% of our clubs who responded to our National Club Survey last autumn anticipated having to increase fees to cover increasing costs.' (Clybiau Plant Cymru Kids' Clubs)

At the same time a number of those commenting stressed the impact of childcare costs on parent/carers ability to work, especially for lone parents.

A few respondents called for a commitment to access to free transport for young people to be included.

Comments on Objective 2 also focussed on making education, training and employment opportunities work for children, young people and parent/carers facing specific barriers related to discrimination or circumstances.

'We welcome the ambition to 'Ensure educational inequalities narrow and standards rise' we particularly welcome 'national employability support to target young people' Nonetheless we encourage Welsh Government to go further in this and recognise that young people are not a homogenous group and require different levels of support due to their different life experiences and backgrounds.' (Barnardo's)

Do you agree that Priority 2 should be a priority for the draft strategy?

Yes 98 (89%) No 5(4%) Don't know/unsure 9 (8%)

Summary

Most (89%) respondents agreed that Priority 2 should be a priority of the strategy.

Those who provided comment most commonly provided further evidence on the importance of and challenges to achieving change on issues such as affordable childcare, access to and affordability of public transport and the need for fair work.

'We agree with the priority and support the need to increase focus to prioritise and consolidate Welsh Government led, national employability support to ensure no one is left behind, to further support those under-represented and disadvantaged in the labour market. Often the underpinning issues are many and complex and require timely support.' (Careers Wales)

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.

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?

Yes 105 (91%) No 3(3%) Don't know/unsure 6 (6%)

A total of 115 people responded to this question, with most (91%) agreeing that Objective 3 should be an objective of the strategy.

Is the information about what we have heard and what the Welsh Government doing in relation to Objective 3 clear and accessible?

Yes 83(75%) No 7(6%) Don't know/unsure 21 (19%)

A total of 111 people answered this question. Of these many (75%) agreed the information about work under Objective is clear and accessible, while 19% were unsure about this.

Summary

Of those who provided comments, there was support for Objective 3 with respondents talking about the ways in which recent events such as the Covid 19 pandemic and the cost of living crisis have impacted negatively on the wellbeing of children, young people, and their families.

There was also support for community based support as an important factor in mitigating the impact of poverty.

'The 'one-stop shop'-style multi-agency services will ease accessing the right services and the right information and may allow better collaboration between organisations. To make community-based services more inclusive, they need to consider service users with mental and physical health issues. The solution could be delivery services of food, befriender services and access to online groups.' (EYST)

A number of respondents provided evidence about housing need, especially for those in temporary accommodation such as Refugee and Asylum Seeking people and the ways in which issues can be especially challenging for ethnic minority people.

Some respondents also felt that there was not enough clear content on the issues covered under this objective for families where a child or parent has Additional Learning Needs or is disabled.

Do you agree that Priority 3 should be a priority for the draft strategy?

Yes 99(88%) No 4(4%) Don't know/unsure 10(9%)

A total of 113 people responded to this question , with most (88%) agreeing that priority 3 should be a priority for the strategy.

Summary

There was a general theme on the need to consider carefully how support, services and community opportunities are developed so that they understand and meet the needs of all community members.

‘We welcome the development of communities, and strongly recommend that in all decisions, children, young people, and families living in these communities are actively engaged from the outset and remain so throughout, are listened to and their needs, concerns and aspirations are heard and acted upon. We would recommend that when delivering more community-based offers for play, sports and youth opportunities, consideration is given to those children and young people who cannot afford to engage with these activities..... All barriers need to be considered and addressed within the development and implementation of community policies and the strategy should clearly verbalise and support this to ensure that those most likely to be affected by poverty are enabled to engage and participate.’ (Children in Wales).

Overall, many of those who commented supported the importance of this priority, with some sharing the community based work they already undertake.

‘We believe that children and young people affected by poverty need to feel that they are valued within their local community and that their needs are being met, whether that be access to play and leisure, youth provision or by not seeing their right to gather as anti-social. Developing a sense of belonging and being accepted will enhance the quality of life for those in poverty.’ (City and County of Swansea).

A number of health organisations set out that they wanted to see a stronger emphasis on the link between poverty and health inequalities and the importance of preventative work to reduce poor health outcomes for those living on low incomes.

Funding for preventative community based services and support was also raised in response to this question.

‘There is a need to look into how good provision of wellbeing activities for all can be sustained within the current financial climate.’ (Conwy CBC)

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.

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?

Yes 100(89%) No 3(3%) Don’t know/unsure 9(8%)

In total 112 respondents answered this question, with most (89%) agreeing that Objective 4 should be an objective of the strategy.

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

Yes 89(79%) No 8(7%) Don't know/unsure 15(13%)

This question was answered by 112 people. Many (79%) of these agreed that the information on Objective 4 was clear and accessible, though 20% were unsure or did not agree.

Summary

Most respondents agreed that Objective 4 should be an Objective of the strategy (89%) and that the information about work under the strategy was clear and accessible.

Of those who provided comment there was support for work to secure kind and compassionate services, though there were suggestions about the need for training and resources to support this.

'Staff need to be given the tools and knowledge to deliver services that are kind, compassionate, and understanding of people's circumstances and reactions to external pressures.'

The Safer Communities Wales Network, Newport County Council and the NSPCC Cymru commented that we should set out the relationship between poverty and the safeguarding of children.

'Poverty is a structural harm which can impact on a parent's capacity to care for their child and Welsh Government efforts to lighten the load for families will work to support the social care system to support families in a non-stigmatising way.' (NSPCC Cymru).

A few respondents said that they would like further information about who engaged in activity to inform the drafting of the consultation draft strategy and more detail about the evidence they provided. The importance of involving children and young people with lived experience of poverty was made.

Do you agree that Priority 4 should be a priority for the draft strategy?

Yes 95(86%) No 5(5%) Don't know/unsure 10(9%)

Of the total of 110 respondents to this question, most (86%) agreed that Priority 4 should be a priority of the strategy, very few did not agree (5%) or were unsure (9%).

Summary

Many respondents (86%) agreed that priority 4 should be a priority for the strategy. Of those who provided comment this was often a reflection on the importance of the issues included but with a call to strengthen these further.

'We believe that child poverty represents a clear violation of children's rights in Wales and therefore feel that this strategy should be drafted within a child rights framework.' (Save the Children).

Comments were also made about the need for funding to support services to deliver change.

'Significant investment from Welsh Government in Family support within schools is needed. If parents are to be supported effectively as part of a cohesive approach, there will need to be further investment. A seismic shift is needed and something transformational to happen to break down these barriers.'

A few comments focussed on the need to ensure that those with lived experience of poverty have opportunities to be heard in decisions about services.

'How will Welsh Government include those with lived experience of the services included in ensuring those services are more inclusive. To ensure service provisions are not stigmatising we need to hear from those who regularly use a service so that we can fully understand their experiences and make adjustments as needed.'

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

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?

Yes 101(93%) No 2(2%) Don't know/unsure 6(5%)

In total 109 respondents answered this question, with most (93%) agreeing that Objective 5 should be an objective of the strategy.

Is the information about what we have heard and what the Welsh Government doing in relation to Objective 5 clear and accessible?

Yes 82(75%) No 11(10%) Don't know/unsure 16(15%)

A total of 109 respondents answered this question, with three quarters (75%) agreeing that the information on work under Objective 5 was clear and accessible and a quarter (25%) who did not agree or where unsure.

Summary

Most respondents (93%) agreed that Objective 5 should be an objective of the strategy. Fewer agreed that the information on work to achieve this objective was clear and accessible, though those who agreed did account for 75% of responses to this question.

Those who provided comment on Objective 5 stressed the importance of work to promote collaboration as a means to tackling child poverty.

‘The Strategy will crucially be delivered through a partnership with Welsh Government, public and voluntary organisations. There are many lessons learnt through the pandemic years, in particular the valuable role of communities and citizens with on-going kindness and support for the most vulnerable in our society. To improve the lives of children and their families who are in poor households and to reduce poverty in the longer term then there must be an effective and targeted approach that builds on existing partnership working and does not seek to erode relationships that have flourished during the most difficult times.’ (WLGA)

Although this was not a view shared by all respondents.

‘We question the need for Objective 5. While effective cross-government working and strong collaboration with regional and local government are laudable ambitions, it seems to us that these are the assumed basis of good governance rather than objectives suitable for inclusion in a specific policy-related strategy’ (Observatory on Human Rights of Children).

A few commented on the need for more financial support to achieve this, especially third sector respondents.

‘We appreciate the importance placed on third sector involvement in the strategy but would emphasise again the challenges faced by the sector in terms of sustainable resourcing and staffing which undoubtedly impacts on its ability to provide that critical support in the longer-term. Smaller, grassroots organisations are particularly badly affected and yet, by their very nature, are those most likely to be run by and for the very communities, public bodies most wish to involve in the coproduction of policy, practice, and services.’ (Third Sector Organisation)

‘Welsh Government and the third sector need to work together to identify areas where more support is needed to help keep people out of poverty, however Welsh Government ultimately needs to take more responsibility and not just expect charities to provide resources, food etc., to communities. The current benefits system is having a huge impact on why some households are in poverty, and this is an area that urgently needs to be reviewed by UK Government.’ (Race Equality First)

Amgueddfa Cymru and the Arts Council for Wales asked for clarity on the role and membership of arts, cultural and heritage Public Bodies on Public Service Boards (PSB) and Regional Partnership Boards.

Do you agree that Priority 5 should be a priority for the draft strategy?

Yes 95(87%) No 5(5%) Don't know/unsure 9(8%)

A total of 109 respondents answered this question, with most (87%) agreeing that Priority 5 should be a priority of the strategy.

Summary

Of those who commented on this question, comments suggested that more needs to be done to support integration and collaboration and that collaboration needs to include a wide range of partners.

'Communication between Welsh Government and Local Authorities does need to be improved, with opportunities for voicing opinions on changes in policies and funding. Local Authorities can provide local intelligence on the issues in their area, rather than always having a blanket approach to support. Working with third sector organisations is already happening locally; however, thought needs to be given to areas of duplication and gaps in support. Roles and responsibilities also need to be set out. Reducing the burden of reporting for Welsh Government funding would be appreciated and is necessary.'

(Cardiff City Council)

'The communities of practice approach is welcomed but the focus of this needs to be wider than public services. We also need to involve grass root organisations, and housing providers. This will then provide a wide good evidence base to inform ongoing and future work to tackle poverty here in Wales.'

(Chartered Institute of Housing)

Other comments focussed on views that further information or commitments are required.

'We welcome reference to the Socio-Economic Duty and the actions under priority 5 to work with public bodies to share good practice and identify new areas where the duty could be applied. We would have expected the inclusion of a priority using the SED as a lever in addressing child poverty in Wales. It is unclear beyond this action how the obligations under the SED have informed the development of this strategy.'

(Equality and Human Rights Commission).

How we will monitor and report on our progress

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

Yes 71(64%) No 25(23%) Don't know/unsure 14(13%)

A total of 110 respondents answered this question. Of these two thirds (64%) agreed that the section on how we will monitor and report on our progress is clear and accessible and one third were unsure (13%) or did not agree (23%).

Of those who commented on this question, a common theme was the need for actions, indicators, and milestones to be included in the strategy.

'RCN Wales welcomes the emphasis on 'seeking research advice on suitable national poverty indicators, data available and a framework to monitor and demonstrate transparent accountability in reporting on our tackling poverty progress. However, the strategy as it currently reads lacks clear actions and timelines for reducing child poverty and rather favours high-level ambitions. This means there is little measurable actions that can be monitored and reported against.' (Royal College of Nursing)

'Our poverty report recommended that the Welsh Government develop SMART national actions with a suite of performance measures to assess its delivery. In this respect, we welcome the proposal to consult further on suitable national poverty indicators, data availability and a framework to check progress. We recognise the use of lived experience in developing the strategy, as recommended in our report. We look forward to consultation on further performance measures. Without this, we are of the view that the current draft strategy is limited in its analysis of data to outline the scale of the challenge and lacks short to medium term targets to support the longer-term milestone. Our report recognised that powers and levers held by the Welsh Government are limited in some areas presently, and these are emphasised in the draft strategy.' (Audit Wales)

Of the 110 respondents who answered this question, 12 (11%) called for the development of a delivery or action plan approach.

'There is a lack of delivery plan, national indicators, milestones and monitoring and accountability framework. It is therefore not possible to make informed comments on how the strategy will be monitored or progress and achievements will be reported on.' (Children in Wales)

'The draft strategy includes some welcome elements, including a commitment to further work on a Welsh benefits system, which we have called for alongside others. However, the draft strategy is not accompanied by any action plan or delivery plan with clear measurable targets, as we have called for over many years. This is highly disappointing. We have made very clear to

Ministers and officials many times the need for any strategy to be accompanied by a robust accountability mechanism.’ (Children’s Commissioner for Wales).

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?

Yes 55(52%) No 15(14%) Don’t know/unsure 35(33%)

Summary

A total of 105 respondents answered this question. Of those just over half (52%) agreed that the strategy adequately responds to the intersection between child poverty and protected characteristics.

‘What is positive is that the protected characteristics are listed throughout the draft strategy such as people with disability and asylum seekers in Objective 1 and individuals with learning needs in Objective 2 etc. The one-stop shop approach in Priority 3 will be an excellent initiative that can help people that fall under multiple protected characteristics get their needs met. What could be an issue is that when individuals are minorities within a minority, therefore facing more barriers, their voices are may not be heard.... In other words, the people facing more barriers and struggling the most may not be heard.’ (EYST)

However, a third (33%) were unsure and 14% did not agree.

‘We think that an additional paragraph in the introduction would be helpful to outline more explicitly the complexity of intersectionality. We also think that stronger reference also needs to be made to people/pupils with additional learning needs, alongside the reference to those with protected characteristics such as neurodivergent people.’ (ESTYN)

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.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Summary

A total of 65 people (41% of all respondents) responded to this question. Many who provided a comment set out their support for the Welsh language standards and confirmed that their organisation operates in line with the standards. Some wanted more explicit reference to Welsh language considerations in the strategy.

Some stressed the importance of considering the Welsh language standards when delivering the strategy.

‘The Welsh language needs to be considered when implementing ‘priority 3: building communities’, to ensure that rural Welsh communities have access to affordable Welsh language provision; and people can seek support in their preferred language and not have any additional barriers to accessing that support’. (Royal College of Nursing).

A few respondents were concerned about the resource implications of meeting the Welsh language standards.

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

Are there any specific areas where you feel further detail is required, or any specific issues you wish to highlight which may have an impact on a specific group?

Summary

A total of 71 or 46% of all respondents provided a response to this question.

Of those who provided a comment, some were positive about the Integrated Impact Assessment.

‘Hywel Dda UHB supports the findings of the Integrated Impact Assessment and agrees that we would not envisage any negative impact resulting from the revised draft strategy. In addition, it was felt that the Integrated Impact Assessment was a useful means of detailing how Welsh Government had systematically considered the Well-being of Future Generations (Wales) Act and the UNCRC.’ (Hywel Dda University Health Board)

However, others were concerned that the Integrated Impact Assessment, as published for consultation, did not include sufficient information and evidence, in particular on assessing against the Socio-Economic Duty, carrying out a Health Impact Assessment or an Equality Impact Assessment in relation to those with protected characteristics.

‘The Impact Assessment lacks data and evidence. The engagement figures are positive, and they suggest wide engagement has been undertaken with underrepresented groups, however, there is no further break down of ethnicity or sex etc. Therefore, it is difficult to assess if an intersectional approach has been taken. We believe a specific impact assessment needs to be undertaken with the regards to the Welsh language.’ (Public Health Wales).

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

Are there any specific areas where you feel further detail is required, or any specific issues you wish to highlight which may have an impact on children?

Summary

Just under a third (30%) of respondents answered this question. Some comments focussed on welcoming the fact that a Child Rights Impact Assessment (CRIA) was completed.

Other comments related to the need to strengthen the CRIA and consider the objectives and priorities of the strategy against the articles of the UNCRC.

‘The CRIA simply lists relevant rights without further evidence informed interrogation of how rights will be affected (positively or negatively) by actions contemplated, proposed to be taken in the Draft Child Poverty Strategy.’
(Observatory on Human Rights of Children)

‘I am pleased to see that Welsh Government has published a children’s rights impact assessment as part of the overall integrated impact assessment (IIA). The assessment recognises that different groups of children are more likely to experience poverty and sets out how Welsh Government set out to engage with those groups. This is welcome. It is also welcome that the CRIA sets out individual articles and gives some narrative of those articles. However, while it gives details of the articles themselves, it does not specifically give examples of how the strategy will actually enhance each of those rights. I believe this would have been a straightforward exercise to undertake and am disappointed that this has not been set out.’ (Children’s Commissioner for Wales)

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.

Summary

Half (50%) of the total 155 respondents provided comment in relation to this question or as part of a general response which did not reference questions numbers.

Some respondents used this section to welcome the strategy.

‘We welcome this draft consultation on child poverty. The strategy is framed around many of our key concerns and we are pleased to see that the Welsh Government continues to have child poverty as a key priority. We value the great efforts made to listen to the voices of the people of Wales and their inclusion in the strategy development.’ (Psychologists for Social Change Cymru)

Many used this question to reiterate issues raised earlier on in their responses. This included the need to strengthen and extend content on policy issues such as health inequality and housing. Responses also set out the importance of tackling issues such as affordable childcare and transport.

Some of those who commented repeated their call for an action or delivery plan and associated milestones and targets.

‘A revised Child Poverty Strategy, complete with a delivery plan setting out the impact and outcomes being worked towards, and which includes a framework with indicators and milestones to measure progress, will go some way to providing this hope for children, families and those across the public and third sector workforce working tirelessly to tackle the effects of poverty.’ (End Child Poverty Network Cymru).

Welsh Government Response

Introduction

We have strengthened the content on children’s rights, the Rights of Child and Young Persons (Wales) Measure 2011 and the United Nations Convention on the Rights of the Child (UNCRC) in the introduction to the strategy. We have also included a direct reference to the ways in which the strategy will promote children’s rights under articles of the UNCRC under sections relating to each of the 5 Objectives of the strategy.

We have amended the introduction to set out more clearly our vision and what we want to achieve for children, young people and their families through the work that will be taken forward under the strategy.

We have acknowledged in the introduction and throughout the strategy the strong link between poverty and health inequalities.

We have not set a lifespan for the strategy for a number of reasons. We want to have the flexibility to review the strategy at any time that may become appropriate as a result of factors that might include for example, a change in policy by the UK Government, an improvement in global economic conditions or evidence from our progress reporting, which might suggest the need to review our approach.

Some respondents said that further funding is required to implement the policies, programmes and commitments set out in the strategy. The strategy explains that the combined impacts of austerity, the UK’s exit from the European Union (EU), the COVID-19 pandemic, stubbornly high inflation and global instability mean we are publishing the strategy amid the toughest financial situation since devolution began. Across government, we will work to mitigate the impact of poverty and inequality in everything that we do. We also need to work with our partners over the long term to achieve the big changes that will make a difference to levels of poverty in the future, despite global socio-economic challenges.

Objective 1 and Priority 1

In light of some consultation responses we have included reference to support for breast feeding in the strategy. We have acknowledged the additional financial challenges faced by families where a member has a continuing health need or is receiving end of life care. We have also included information about the Discretionary Assistance Fund and water affordability.

A few respondents want the Welsh Government to make more direct regular payments to families, to increase their incomes. The devolution settlement does not give the Welsh Ministers the powers to implement a scheme along the lines of the Scottish Child Payment.

Objective 2 and Priority 2

We have included an explicit reference to the importance of the first 1000 days and we have included more information about early years support as a result of consultation responses.

Of those who commented the need for education, training, and employment opportunities to take into account the needs of those with protected characteristics or personal circumstances which can disadvantage them through discrimination was raised. We have set out the ways we are working to ensure education meets the needs of all learners. We have amended the wording of one of our commitments to be clearer about work to remove barriers to employment and career pathways for disabled people, women, carers, and ethnic minority people, whilst improving workplace practices and culture.

There are no easy solutions to the calls to expand affordable childcare, supporting providers who are facing financial pressures, and ensure a quality childcare offer meets children's needs. This has to be carefully balanced with parent/carers need for more childcare provision. We have committed to continue to work to find affordable solutions to this issue.

Access to free or low cost transport was also raised in some responses and we have also said that we will continue to work towards sustainable and affordable solutions for transport.

Objective 3 and Priority 3

We have strengthened the content on housing issues in the strategy, in response to comments about the importance of this and the links between housing, preventative services and health.

The strategy now includes information about the complex relationship between poverty and safeguarding issues for children and young people and acknowledges the importance of preventative services in addressing this.

Objective 4 and Priority 4

As we set out in the draft strategy, the ACE Support Hub and Traumatic Stress Wales are implementing the Trauma Informed Wales Framework, which will include the identification of any additional resources required, including help and support for organisations.

The strategy explains that we will publish a fuller account of the evidence we gathered from children and young people, parent/carers, and community members with lived experience of poverty and the organisations that support them through pre-consultation engagement activity. The strategy also commits the Welsh Government to involved children and young people, parent/carers, and community members with lived experience of poverty in monitoring our progress on tackling child poverty.

Objective 5 and Priority 5

As we develop work to deliver against Objective 5 and Priority 5 we will engage with a wide range of partners who contribute to tackling child poverty in Wales. This will include those with child poverty duties under the public bodies subject to the Children and Families (Wales) Measure 2010 and a summit has already been delivered to start this process. Work will also include wide engagement with organisations who are not subject to statutory duties but who make a vital contribution to tackling child poverty. As we develop our Communities of Practice work, we will engage widely on what needs to be addressed, how to promote effective practice and work to identify and resolve shared ‘wicked issues.’

Measuring the impact of what we do

A delivery or action plan is not an appropriate vehicle for planning the long term change that we want to achieve. There are Welsh Government action plans which sit within the realms of the Child Poverty Strategy which will detail and measure progress under the relevant Programme for Government activity. We also cannot commit future governments to spending against budgets that have not yet been set.

However, tackling poverty and inequality remain central drivers in the development of our Programmes for Government and help ensure a cross-government approach to tackling poverty. We are progressing work to identify how we can most effectively employ the [Wellbeing of Wales National Indicators](#) to monitor and report on the impact of this strategy in the future. This includes involving people with lived experience, including children and young people, in telling us whether we are achieving. The next Child Poverty Strategy Progress Report will be available in December 2025.

Intersectionality – Poverty and protected characteristics

We have included more explicit reference to the evidence on the fact that socio-economic disadvantage is highly intersectional. Meaning that deprivation interacts with protected characteristics, and certain people and communities experience worse outcomes as a result of barriers they face because of their protected characteristic in combination with socio-economic disadvantage. We have included information about our equalities plans (on anti-racism, gender, disability, and LGBTQ+ issues), in the introduction to the strategy, noting that the delivery of each of the Action Plans will need to consider the intersectionality between poverty and discrimination.

Welsh language

While there are existing requirements in relation to the delivery of services in line with the Welsh Language (Wales) Measure 2011, we have now included a direct reference to the legislation and the Welsh language standards in the introduction to the strategy.

Integrated Impact Assessment and Children’s Rights Impact Assessment

The Welsh Government consulted on a summary of the Integrated Impact Assessment (IIA).

The full Integrated Impact Assessment completed in the development of the consultation draft, and updated for the final Child Poverty Strategy, requires that a Socio-Economic Duty Assessment be undertaken, and this was completed before consultation.

An Equality Impact Assessment was completed in relation to the consultation draft strategy, as part of our IIA.

A Health Impact Assessment is required as part of the IIA process and was completed before consultation.

A Welsh Language Impact Assessment was completed on the consultation draft of the strategy, before publication as part of our IIA,

The consultation responses will be considered in our review of the IIA and the Children’s Rights Impact Assessment (CRIA). These will be reviewed and updated in relation to the final strategy document.

Each of the policies and programmes referenced in the strategy have also been subject to an IIA and many will have been subject to a CRIA it is not our intention

therefore to repeat / duplicate those assessments as part of the Strategy. The IIA and CRIA are live documents that are reviewed over the lifetime of a policy or programme.

Conclusion

Overall, most of those who responded to this consultation agreed with the objectives and priorities of the strategy. In general, some people have asked for further detail on the ways in which we will deliver against these objectives and priorities, and a few have called for milestones, targets and/or a delivery action plan.

The strategy is a high level framework to maximise the levers we have at our disposal, across government, to make our contribution to eradicating child poverty. There are actions that we need to, and are taking, to look at ways that organisations can better collaborate and work with partners with tackling child poverty as a common aim. We will work with our partners to support the implementation of cross-cutting work to achieve this.