

Response 107.

Youth Work Statutory Framework consultation.

[Information redacted]

Definition of Youth Work

The Wellbeing of Future Generations Act 2015 has a strong focus on prevention of issues that may harm future Well Being goals. Youth work plays a vital role in supporting children to thrive and in preventing them from coming into contact [Information redacted]. [Information redacted] welcomes the Welsh Government's commitment to strengthening Youth Work in Wales.

[Information redacted] believes it is helpful to provide a single definition for youth work. While the proposed definition has merits, it appears narrowly focused with areas of uncertainty such as how it integrates in wider youth support services.

There is risk of several potential unintended consequences from this definition, such as *Children's Rights and Entitlements*.

While the guidance is clear that youth work is a fundamental part of education and that the Statutory Framework takes a rights-based approach, the definition does not acknowledge access to youth work as an entitlement. The guidance needs to be strengthened to reinforce that youth work is founded on the rights of children and young people. The guidance should be explicit in terms of the rights basis for the youth work offer and would benefit from emphasis on participation, co-production and accountability to the children in receipt of the offer, in line with Article 12.

Confusion with other definitions.

More clarity is needed on how the proposed definition relates to the definition of youth work set out in National Occupational Standards, which is more inclusive of the whole sector and the role youth work has in supporting children to develop their strengths and skills, to thrive and be active members of society.

The role of the third sector.

[Information redacted] is aware the youth work workforce spans across the public and voluntary sectors and includes both paid staff and volunteers, with a significant level of third sector delivery. The guidance places an obligation on local authorities to collaborate with partners to develop the 'wider workforce.' It is not clear from the guidance how such continuous development will be funded. Continuous professional development will undoubtedly strengthen the role of Local Authorities but may have the unintended consequence of diminishing the contribution and role of third sector

organisations that may not have resources to invest in such professional development. Potentially squeezing the sector in such a way may push small, specialist providers out thereby limiting the diversification of skills within the youth work sector. From a Child First perspective this would potentially limit the ability of the sector to both fully meet the diverse needs of children and to harness their full range of strengths to overcome social and personal barriers to achieving their potential.

Integration in youth support services.

The guidance does not provide sufficient clarity on how youth work as defined in the guidance is integrated as part of youth support services. The role and value placed on youth support could be diminished if the defined level of professionalism is prioritised. The right balance needs to be struck between the importance of relationship and strengths-based approaches used by trusted adults and qualified professionals.

Re-direction of youth work.

There is a risk that youth work could be re-directed to provide alternative forms of formal education. School exclusions and use of alternative provision has continued to increase. While the values, ethos and practice of youth work has considerable benefits in engaging children, the definition would benefit from further direction to local authorities on the scope of youth work provision to protect the capacity youth work.

Youth work strategic plans

A strategic plan can be a useful tool for clarifying direction and delivery commitment, however youth work is interconnected with other areas of policy and delivery. This is recognised when setting out requirements for integrated assessment of need and the development of holistic responses, but there is no consideration of integrated strategic planning. [Information redacted] is an example of one aspect of inter-connected delivery. [Information redacted] are required to produce strategic plans. [information redacted] in Wales are integrated within wider youth services. For those services, the requirement to produce an additional strategic plan and meet subsequent reporting requirements will have a significant resource impact, reducing capacity for front-line delivery.

[Information redacted] that strategic planning therefore needs to be conducted in the most effective and efficient way to avoid placing additional and unnecessary burden on services. There needs to be consideration of how the requirement for planning will ensure there is join-up where plans are aiming to achieve the same or similar outcomes. This will minimise planning and reporting burden. From a Child First perspective, strategic planning in isolation both reduces capacity to meet the needs of children and potentially introduces additional structural barriers. [Information redacted] recommends consideration be made to amending the guidelines to provide the

flexibility around integrated strategic planning. This would also require flexibility around plan approval and reporting.

In relation to accountability, a plan alone does not provide accountability without a clear and dedicated oversight or inspection framework or established standards for delivery, against which provision will be measured.

[Information redacted] provides an example of an accountability framework with established national standards for delivery underpinned by key performance indicators. [Information redacted].

The guidance is not clear on what the accountability framework will be for youth work in Wales, nor is it clear if the proposal in the guidance signals the need for a national oversight body, or where the capacity, expertise and capability is to be found for that. If there is a need for a national oversight body, it is vital that funding is not diverted from front-line delivery to establish it.

Finally, the proposal does not outline how strategic planning will put youth work on a more stable or sustainable footing.

Youth work entitlement and Youth Work offer

It is vital that entitlement is offered equally to all children in Wales, but the framework does not clarify how equity will be achieved. Consideration should be given to how entitlement will reach all children in Wales. The offer must also be trauma informed and promote anti-racist practice. The guidance would benefit from clarity on how the framework aligns and integrates with these and other policy areas such as 'Extending Entitlement.' It is also not clear if the entitlement in the guidance will supersede Extending Entitlement. Clarity should be provided on this point and if Extending Entitlement is to be replaced, how an equitable transition will be made from one entitlement to another in a way that minimises the impact on children.

There is recognition in the guidance that the youth work offer will vary from one area to another, dependent on its characteristics and population. [Information redacted] understands the need for services to respond to local needs but there is an inherent risk of widely varying levels of service depending on where a child lives. This type of 'post-code lottery' must be avoided to ensure equal opportunity and equity of service provision to all children regardless of their background. [Information redacted] views that the guidance can be strengthened in this respect through the inclusion of minimum standards of delivery to which all Local Authorities must deliver.

Partnership working

[Information redacted] welcomes the recognition of the inter-connected nature of youth work and other areas where needs assessment is an element of delivery, [Information

redacted]. [Information redacted] welcomes the requirement for multi-agency partnership working to develop holistic approaches.

[Information redacted] welcomes proposals to ensure each local authority engage and consult with children to ensure provision is driven by the needs of children and young people. From a Child-First perspective it is imperative that children's active participation, engagement and wider social inclusion is encouraged. All work must be a meaningful collaboration with children and their carers. This echoes Article 12 of the UNCRC.

[Information redacted] welcomes the intention to make the requirement to enable children and young people to participate in the design and delivery of youth work. This requirement should be as robust as possible. The intention to capture a broad spectrum of viewpoints is welcome as is the recognition of the need to put arrangements in place to ensure meaningful participation. These measures should include consideration of ways to make sure all children have an equal level of understanding of the message and questions being asked of children who will have differing levels of need, cognitive development and understanding.

The need to make use of effective and efficient engagement is noted but there is a potential unintended risk that the default mechanism would be through mainstream schools. There are increasing levels of exclusion, persistent absence and EOTAS in Wales. These children are likely to be those in most need of support through youth work and other means. It is imperative that local authorities are encouraged to consider effective ways of reaching out to those children.

[Information redacted] recognises local variation in delivery structures, the requirement should be that local authorities must enable meaningful participation. This does not need to be prescriptive but could be strengthened by establishing minimum standards or guiding principles for participation. These would help ensure that participation is not tokenistic, that it captures a broad range of perspectives and diverse participation that encompasses poverty, Additional Learning Needs, ethnicity and other protected characteristics.

[Information redacted] agrees with proposals to encourage greater collaboration in delivery. Partnership and collaboration are a vital element of meeting the diverse needs of children and helping them achieve positive outcomes. All public services in Wales face a challenging fiscal situation so it is vital that youth work budgets do not reduce. [Information redacted] we are aware that there is consideration of budget efficiencies and reductions. It is unclear the level of investment that is required to achieve the aims of the framework. We also consider that the success of collaboration will be largely influenced by the role children and young people play in shaping the youth work offer in their area.

[Information redacted]