

**Response 62. Welsh Local Government Association (WLGA)/ Association of Directors of Education (ADEW) and Wales Principal Youth officers group (PYOG) joint response**

**Youth work statutory framework consultation.**

**Welsh Local Government Association - The Voice of Welsh Councils**

We are the Welsh Local Government Association (WLGA); a politically led cross-party organisation that seeks to give local government a strong voice at a national level. We represent the interests of local government and promote local democracy in Wales.

The 22 councils in Wales are our members and the 3 fire and rescue authorities and 3 national park authorities are associate members.

**We believe that the ideas that change people's lives, happen locally.**

Communities are at their best when they feel connected to their council through local democracy. By championing, facilitating, and achieving these connections, we can build a vibrant local democracy that allows communities to thrive.

**Our ultimate goal** is to promote, protect, support, and develop democratic local government and the interests of councils in Wales.

**We'll achieve our vision by**

- Promoting the role and prominence of councillors and council leaders
- Ensuring maximum local discretion in legislation or statutory guidance
- Championing and securing long-term and sustainable funding for councils
- Promoting sector-led improvement
- Encouraging a vibrant local democracy, promoting greater diversity
- Supporting councils to effectively manage their workforce

**Introduction**

Local authorities see youth work provision as vital for young people to learn in their communities and settings other than formal institutions and develop the skills necessary to become valued and productive citizens. Local government has a strong history in leading and delivering good quality youth work, particularly following the watershed Albermarle Report (1960), which outlined the need for local government to take on responsibility for providing extracurricular activities for young people. Out of this report, the statutory sector of the youth service was born. This is a joint response from the Welsh Local Government Association (WLGA), the Association of Directors of Education in Wales (ADEW) and the Wales Principal Youth Officers' Group (PYOG) to the Welsh Government consultation on a new statutory framework for youth work – *Youth work in Wales: delivering for young people*.

Q1. Do you feel that the proposed definition of youth work is clear and helps differentiate youth work from other services supporting young people?

1. In their *Thematic Review of Youth Support Services* (2018, p. 4), Estyn stated that “*There is a lack of clarity among service providers and policy makers about the terminology used when discussing services to support young people. The term ‘youth work’ is often confused with ‘work with young people’. This leads to conflicting ideologies and priorities, which does not help to support policy development*” and called on the Welsh Government to “*Clarify the use of the terminology ‘youth work’, ‘youth service,’ and ‘youth support services’ in Wales in order to provide a universally understood language for policy development and delivery*”. A lot of work has been carried out in and on behalf of the youth work sector since then, particularly via the two iterations of the Youth Work Board (in place following the Senedd Children, Young People and Education Committee’s inquiry into youth work, 2016), but **there remains a lack of clarity around terminology**, with an additional term, that of “youth work services” having also found its way into the vernacular.
2. Further, whilst the registration of youth workers and youth support workers via the *Education Workforce Council* (EWC) was a welcomed development in 2017, this **lack of clarity has been compounded** by the definition used in *The Education Workforce Council (Registration of Youth Workers, Youth Support Workers and Work Based Learning Practitioners) Order(2016)* which refers to youth workers and youth support workers as “**youth development services**”, which seems to be an anomaly. This is too broad a term to describe what is a professional workforce delivering a service to young people as underpinned by a non-formal/informal education approach.
3. In this context, whilst supportive of a definition of youth work being developed and enshrined in law via the *Youth Support Services (Provision of Youth Work) (Wales) Directions 2025*, we feel that there is some refinement required around the proposed text. Our commentary/response on this is informed by the key purpose of youth work as described in the youth work *National Occupational Standards* (NOS):  
  
*‘Enable young people to develop holistically, working with them to facilitate their personal, social and educational development, to enable them to develop their voice, influence and place in society and to reach their full potential’*,
4. Whilst there is no mention of the Youth Service (the framework by which youth work is delivered) in the proposed definition, youth support services is referred to as a singular service, which it is not. So, the recommendation on this first part of the definition ought to read thus “**...youth work is defined as “services provided within youth support services...”**. This also applies to the proposed changes to the subordinate legislation where “**youth support service**” (singular)

is also referred to under the definition for youth work (page 2), although the plural “services” is correctly used elsewhere.

5. The next part of the definition references a “...*distinct educational approach based on the voluntary engagement of young people*”. This distinct educational approach is what makes youth work identifiable as different to that in schools/colleges (formal educational institutions) and would, therefore, benefit from further clarity i.e. an **educational approach based on non-formal/informal learning**. Though the methodology is different to formal education, youth work also often has **clear and planned learning objectives and outcomes**. This not only more clearly describes the approach as being specific within the youth support services offer as an education service but also within the education family as complementary to formal education. The NOS description also mentions “...personal and social...development...”, so we recommend also including this.
6. The final part of the proposed definition refers to youth work as being “...*delivered by persons holding a youth worker or youth support worker qualification*.” Whilst supportive of this principle, the WLGA, ADEW and PYOG are also conscious that a great deal of youth work is supported by highly valued part-time unqualified workers and volunteers who also deserve recognition for their role. As such, we make the case for the words “...delivered by...” to be amended to “...led by...” i.e. that it reads “...**led by persons holding a youth worker or youth support worker qualification**’.” Referring again to the Estyn thematic report, “*Professional youth work staff are more demanding, and are more likely to seek out ways to ensure ongoing dialogue with young people either individually or in groups, and to provide feedback on the outcomes of the views they have shared.*” (P. 25).
7. In summary, our proposal for the definition would read thus:

*“services provided within the youth support services offer using a distinct non-formal/informal (personal and social) educational approach based on the voluntary engagement of young people led by persons holding a youth worker or youth support worker qualification’.*

Q2. Are there any unintended consequences in taking this approach?

8. The WLGA/ADEW and PYOG welcomes greater clarity on the definition of youth work and is supportive of a stronger legislative foundation for the profession and, therefore, the offer for young people aged 11-25. The only unintended consequence we can foresee in regard to the proposed definition is (as explained) potentially overlooking the valued unqualified and/or volunteer workforce. This can be avoided by replacing the words “delivered by” with “led by”.

Q3. Do you feel that the requirement for a youth work strategic plan will help strengthen the design and delivery of youth work?

9. Whilst in principle a 5 year strategic plan may appear to be an effective method for strategic planning, monitoring and evaluation, as well as an opportunity for mapping providers in the sector and for creating a platform for improved partnership working, there are some concerns herein. The primary consideration is around congruency between a **5 year strategic plan and annual funding** for services/providers, which can work against efforts to plan longer term. In a growing sector, this would not be such an issue but, as reported by the *Wales Youth Work Funding Review*, “...total maintained youth work sector income has reduced by 26% since 2010/11” (WG Youth Work Funding Review, Phase 2 Report, June 2024), ensuring a consistent offer for a 5 year strategic plan will be challenging as funding for youth work continues to reduce. Due to increasingly tight funding settlements, some local authorities are left with no option but to again consider restructuring their youth service which could result in such a small core team that applying for/ drawing down additional/external funding might not be possible. The voluntary sector also continues to face drastically reduced budgets, with some provision closing as a result.”
10. Whilst not a solution to the dynamic between long term planning and ongoing reduction in funding/provision, **annual action plans** linked to a 5 year strategic plan could mitigate some of this as they can take account of the changing funding and provision landscape in the context of higher level objectives.
11. The PYOG, ADEW and WLGA seek assurances that, whilst this review sets out to address recommendation 2 from the *Interim Youth Work Board’s Time to Deliver for young people* report i.e. to “*Establish a legislative basis for youth work in Wales*”, that future considerations for policy development in this sector do not deviate from this intention. Whilst the draft framework refers to “youth work strategic plans”, concern remains that this may broaden out to include other **youth support services**. Were this to happen, a further consultation would be required as there currently is not the capacity or infrastructure in place to do so. When such an arrangement was in place recently, (under the Children & Young People’s Partnerships and Young People’s Partnerships) funding, capacity and resource was provided centrally to carry out this work. Whilst current proposals for youth work plans will be a challenge, anything broader than this would require a whole new rethink of structures etc.
12. In considering the requirement in Section 9 (3) of the proposed Directions, in the event of a rejection or required modification to “the strategic plan”, the PYOG, ADEW and WLGA seeks further clarification as to **what support will be in place** to either avoid such a scenario and/or to quickly expedite any concerns to ensure that the plan does receive approval.
- Q4. Do you feel the youth work strategic plan will provide an effective accountability structure for youth work?
13. Whilst youth work is highly valued (no more so than during and as we continue to emerge from the recent Covid pandemic), the sector has in the past struggled to be seen as a strategic service. Indeed, the Ministerial Foreword to the second *Wales Youth Work Strategy* (2014-18, p. 2) stated that “*Youth work practice*

*needs to be seen across Wales as a strategic service, not as an aspect of a leisure service or indeed as a service of last resort.” So, any attempt to elevate its status and ability to have a greater impact at strategic level should be welcomed.*

14. Any successful strategic plan must ensure that all parties not only make valued contributions to the development and delivery of the plan but are also **accountable for their roles** in meeting the objectives of said plan, reflecting the needs of young people (“the evidence base”). Whilst a crucial element of accountability will be to the young people themselves, the legal framework sets out that local government will continue to be responsible and accountable for the development and delivery of a strategic plan.

15. Though not mentioned in the draft directions or consultation document, **Section 125 of the same Act sets out which bodies local authorities shall consult with when complying with a direction under Section 123** i.e. a local health board, chief officer of police, police and crime commissioner, probation committee, a provider of probation services, a youth offending team, “...*any voluntary body which provides services for young persons in the place or area concerned and which the local authority think it appropriate to consult*”, the Commission for Education & Research (Medr), Careers Service etc. So, the assumption would be that this will continue to apply to youth work (an element of youth support services) strategic plans and forms the basis for an effective accountability structure. Further comments on accountability are found below in answering Q 6.

Q5. The proposals are intended to ensure local authorities design and deliver youth work provision in a collaborative way according to local need. Is this a helpful approach or is there is a need to be more prescriptive?

16. Youth work provision always responds to and is determined by the needs of young people (aged 11-25) in each local area. This **requires as much flexibility as possible**. For example, one local authority (or an area within a local authority) might have a predominantly younger population, meaning that provision needs to be made available (either directly and/or with partners) to meet these needs i.e. open at times which best suit 11-15 year olds (for example) and providing stimulating/challenging educational activities appropriate to this age group. Conversely, a neighbouring area may have more 19-25 year olds who will most likely require later opening times and a programme of activities more relevant/suited to their age group.

17. Whilst this articulation of need is based on continual dialogue with and participation of young people, meeting these needs in a collaborative way between relevant providers is key to ensuring that young people are able to **fully access their entitlements**.

18. As mentioned above, *Section 125 of the Learning & Skills Act* sets out which partners local authorities are required to collaborate with (see above) so, in this respect, the legislation is already quite prescriptive.

Q6. Are the accountability arrangements proposed in the statutory framework sufficiently robust and clear?

19. Given that partners for developing the strategic plan are identified in Section 125, what is not mentioned in the proposed amendment to the legislation (section 8) is how partners will also be held to account as part of this framework. One would assume that the recent **introduction of Estyn inspections of youth work** (including voluntary sector providers) will play an increasing role in this for voluntary sector providers but it does need to be noted that, unless directly funded by, in contracting arrangements with or via service level agreements, non-statutory partners e.g. those in the voluntary sector cannot be held to account directly by local authorities. Should there be proven issues/concerns with any partner of this nature however, a local authority can terminate any arrangements with that partner but perhaps this area of accountability needs further consideration.

20. There are already in place a number of levels of accountability which departments and plans in local authorities are subject to e.g. officer and political scrutiny and, externally, inspection bodies (in the case of education services, Estyn), as are other statutory partners.

Q. 7 Does the proposed youth work entitlement clearly encapsulate how we collectively wish to see youth work designed and delivered?

21. Any youth work entitlement will depend mainly on three variables:

- The **needs of young people** in any given local area as articulated by young people via ongoing engagement by and with the local authority, which will determine priorities and overall offer.
- The **definition of youth work** (see our feedback on this above) as applying to all partners offering provision. Decisions on whether a partner is deemed to be part of the youth work entitlement i.e. is delivering youth work and not other work with young people as part of the wider youth support services offer, appears to be **down to a local authority** (Section 5. (5)) but a legal definition will be essential in underpinning this process.
- **Funding** – this is particularly relevant in the context (and ability to offer) of universal/open access and targeted provision. As articulated in paragraph 9 above, both core (mostly providing open access/universal) and grant (targeted provision) funding for youth work continues to reduce. Many **services are run on a ‘patchwork’ funding model**. This is not to say that this model is entirely detrimental as additional (grant) funding can be essential in broadening any local offer. However, this (grant) funding is usually short-term, so lacking consistency and introducing challenges around recruitment/retention of staff and can make demands on youth work which may distort the youth work offer. In such scenarios, youth work providers often have to adapt and innovate.

22. This said, other than considering an additional sub section of the legislation on **how the youth work entitlement may relate with the wider youth support services** offer, we have no more to add to paragraph 5 of the draft legislation, though the detail in the new framework when finalised will be important in influencing this.

Q. 8 The statutory framework requires a local authority to ensure young people can participate in the design and delivery of youth work. The precise approach in achieving this would be determined by local need and structures. Do you consider there is a need to be more prescriptive?

23. Youth work has a strong and respected history in both engaging with young people in the design and delivery of the youth work offer. There are **successful, well embedded structures across the service** for doing so, such as youth fora, youth parliaments, youth councils and embedded participation structures at all levels. The local authority lead officer for children and young people's participation is often also located within youth service structure. All services use the **children & young people's participation standards** to underpin their work. Whilst being far from complacent in this regard, it is felt that structures for engagement with young people in the design and delivery of youth work are robust and effective and that no further prescription is required.

24. Whilst some of the barriers to accessing youth work (as articulated by young people) are within the gift of the sector to improve (raising awareness of provision and ensuring they are accessible and welcoming spaces), some are beyond the control of the sector e.g. transport. However, youth workers continue to support young people directly and as advocates in raising these matters with the relevant powers and authorities in working towards resolutions for these.

25. We have discussed above the important role of young people holding the local authority and partners to account. This is equally important at service design and delivery stages.

## Conclusion

As stated at the start of this response, **local government is proud of its statutory role** in the provision and co-ordination of youth work and very much sees the relevance and importance it brings to thousands of young people across Wales. In this context, we also support the proposal to strengthen the statutory basis for youth work in Wales via the *Youth Support Services (Provision of Youth Work) (Wales) Directions 2025* and, in the process, bringing greater clarity in the context of youth support services provision.