



Llywodraeth Cymru
Welsh Government

The Welsh Government response to the Annual Report of the Children's Commissioner for Wales 2019–20

November 2020

**RESPONSE FROM THE WELSH GOVERNMENT TO THE ANNUAL REPORT OF
THE CHILDREN'S COMMISSIONER FOR WALES 2019-20**

Foreword by

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First Minister of Wales**



and

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FOREWORD

As a Government we welcome the Children's Commissioner's annual report for 2019/20. This report covers the period 1 April 2019 until 31 March 2020 touching on the start of the coronavirus pandemic however we would be remiss if we didn't acknowledge the huge impact that the pandemic has had on children and young people. We therefore welcome this annual report in the context of our ongoing response to the pandemic.

We want to acknowledge the work of the Commissioner in standing up for children's rights during this crisis and her role in ensuring the voices of children are heard by the Welsh Government.

We thank her and her team for leading on the 'Coronavirus and me' survey during the early stages of coronavirus to provide an opportunity for children and young people across Wales to tell us about their experience of the pandemic, the lockdown which was in place at the time and the impact it was having on their lives. Their responses were heard across the Welsh Government by politicians and policy makers alike.

We were proud that the Children (Abolition of Defence of Reasonable Punishment) (Wales) Act 2020, received Royal Assent on 20 March. We are rightly proud that our nation has taken forward this important reform, to ensure that children have the same protection from physical punishment as adults. The Children's Commissioner has been a long standing campaigner for this legislation and we want to acknowledge her significant work over a number of years to see this Act being signed in to Welsh law.

The Commissioner's principal aim is to safeguard and promote the rights and welfare of children, and we can see in this her 2019/20 annual report that she is exercising two of her functions holding the Welsh Government to account for its actions to protect and promote children's rights for the children of Wales and advocating on behalf of children and young people.

We thank the Commissioner for this opportunity to look at our work and review our progress in terms of how we give due regard to children's rights in all that we do.

In her 2019/20 annual report, the Children's Commissioner made 18 recommendations to the Welsh Government and we are pleased as a Government to accept the majority of the recommendations.

Whilst we are rightly proud of our record of promoting children's rights and working to ensure that all children have the best start in life, there is always more that we can do to ensure that all children across Wales know about their rights how to access them and how to challenge when they are not receiving the rights that they are entitled to.

2020 has been a difficult year for many, but it was only this time last year we were celebrating the 30th anniversary of the United Nations Convention on the Rights of the Child (UNCRC). We attended a celebratory event on Universal Children's Day on November 20th with the sector to celebrate the 30th year since UNCRC was created.

The celebration coincided with an awareness raising campaign on children's rights. This campaign was about empowering children and young people to know about their rights and to know how to realise their rights.

Finally we want to build on our achievements so far to ensure Wales is a place where children's rights are respected, protected and fulfilled and to restate the commitment the Welsh Government has to the UNCRC which continues to be the basis for all our policy decisions affecting children. It is central to our approach and our work to improve children's outcomes by helping and supporting them to achieve their full potential.

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INTRODUCTION

The Children's Commissioner for Wales published her annual report for 2019-20 on 1 October 2020. The report can be accessed [Children's Commissioner for Wales' annual report and accounts 2019-20](#).

The report sets out some of the key achievements of the Commissioner's office during the year, including achievements in relation to the first year of the Commissioner's three year strategic plan (2019 – 2022). (Pages 8 and 9).

A key theme of the report is the Commissioner giving a voice to the voiceless. Whilst the annual report period doesn't cover the period of the coronavirus pandemic, the Commissioner highlights the significant impact the pandemic has had on children and young people across Wales. The report also highlights the impact the pandemic has had on her office and on the Welsh Government.

This year, the Commissioner has made 18 recommendations for the Welsh Government to consider and respond to. The recommendations cover a wide range of areas across Welsh Government, including:

- Safe accommodation of children with complex needs;
- Personal Advisers for care leavers;
- Semi-independent or supported living opportunities for care leavers;
- Corporate parenting reform;
- Criminalisation of children in care;
- Youth Justice Blueprint;
- Child Sexual Exploitation statutory guidance;
- Investigations into allegations of child abuse against teaching staff;
- Disciplinary and Dismissal guidance for governing bodies;
- ALN Code of Practice;
- Independent school registration with the Education Workforce Council;
- Child Poverty Review findings;
- Whole school approach to wellbeing
- Together for Children and Young People (T4CYP) Programme;
- Health transitions guidance;
- Review of evidence on all-age mental health services;
- Guidance for independent health advocacy services;
- Responding to the 'No Wrong Door' report.

The Welsh Government is accepting 16 recommendations, accepting in principle one recommendation and rejecting one recommendation.

The recommendations made by the Commissioner and the headline response from the Welsh Government to each of these recommendations are summarised in Annex A.

The rest of this report sets out each of the Commissioner's recommendations, followed by the headline response from the Welsh Government which includes detail setting out the actions that the Welsh Government is taking to address the recommendations.

FAMILY ENVIRONMENT AND ALTERNATIVE CARE

1. Safe accommodation for children with complex needs

Children's Commissioner's recommendation:

Following the review of safe accommodation for children and young people with complex needs there should be urgent action by Welsh Government to establish new multi-agency commissioned and resourced residential provision within Wales, which meets the needs of children and young people with complex needs.

The Welsh Government Response: Accept

We are working with the Regional Partnership Boards (RPBs) to develop and deliver accommodation, care and support for children and young people with complex, 'high end' needs. £15m of ICF funding has been made available to support children's projects, some of which are focussed on the high end of need.

We are encouraging the RPBs to look again at their ICF investment plans to see if they can adapt them for this high need purpose. We have written to the Boards seeking information about need in their areas and their ability to buy and prepare properties.

Boards are at varying levels of progress with some acknowledging that need exists and others with provision already in place.

We are working to identify how best we can guide ICF capital and revenue funding to assist progress. Investing in infrastructure to provide both accommodation and services for vulnerable children with often very complex needs has always formed part of the ICF capital programme objectives in Wales. Ultimately, it is the decision of RPBs, based on evidence in their statutory Population Needs Assessments, to invest in these services.

A number of RPBs have taken forward and are delivering projects for vulnerable children during the current three year funding cycle, including North Wales and Gwent.

In addition, Powys has developed proposals for a residential accommodation project providing wraparound, multiagency and therapeutic support to children with complex needs. Ministers have recently approved in principle capital funding to support it. The North Wales sub-region of Flintshire and Wrexham, and Neath Port Talbot (in the West Glamorgan region), are also developing bids to provide care and support for children with complex emotional and behavioural needs in the same therapeutic, multiagency space.

2. Personal advisers for care leavers

Children's Commissioner's recommendation:

Welsh Government must place extended access to Personal Advisers on a statutory footing. Whilst the Welsh Government provided local authorities with funding to ensure all care leavers up to the age of 25 can continue to access a personal adviser, we know there are variations in how this is extended and delivered. Placing this entitlement to the age of 25 on a statutory footing would protect this vital support service going forward.

The Welsh Government Response: Accept

Since 2017/18, Welsh Government has provided local authorities with an additional £1m to extend Personal Adviser support for care leavers aged 21-25. This has enabled authorities to recruit additional Personal Advisers to provide an extended offer of support. Feedback received from local authorities about the use of this money has been positive.

Welsh Government is aware of concerns about the consistency and pace of delivery, by local authorities, of the entitlement to a Personal Adviser to all care leavers up until age 25.

To affirm our commitment in this area and support improved consistency, we support the principle of establishing a legal requirement that all care leavers have an entitlement to a Personal Adviser up to the age of 25.

We have thoroughly considered all legislative options and have established a way forward which means we can make this change via Regulations under the Social Services and Well-being (Wales) Act 2014.

Whilst we accept the recommendation, in light of wider decisions taken around the urgent prioritisation of legislative matters relating to the coronavirus pandemic, EU transition work and the ongoing legislative programme, this will now be undertaken in the new Senedd Term.

3. Semi-independent or supported living opportunities for care leavers

Children's Commissioner's recommendation:

The Welsh Government should explore how semi-independent or supported living opportunities can be developed for care leavers who do not want to, or cannot access, "When I'm Ready" placements. This would ensure young people, regardless of their type of placement, could access ongoing support beyond the age of 18.

The Welsh Government Response: Accept

Developing a range of accommodation options for care leavers remains a key commitment of the Improving Outcomes for Children programme.

A joint housing and social services group has been established, to strengthen the arrangements in place to successfully transition young people from care into independent living.

Whilst the *When I'm Ready* scheme applies to children in foster care, the same model cannot be translated to residential care, where costs are significantly higher in residential care and there are concerns about the appropriateness of adults living with younger children.

The accommodation options group is looking at different models, for instance young people from residential care maintaining links and support with professionals from their previous residential care home.

This will be progressed in the remainder of this Senedd Term.

4. Reform of ‘corporate parenting’

Children’s Commissioner’s recommendation:

Welsh Government must reform “corporate parenting” so it is the responsibility of all public organisations in Wales to ensure the best for children who can no longer live with their families.

The Welsh Government Response: Accept

Reforming and extending corporate parenting across all public services is a key commitment within our Improving Outcomes for Children programme.

A Cabinet Paper was agreed in November 2019 setting out our corporate parenting proposals. This describes our aim to widen the concept of corporate parenting across all public services, to help ensure care experienced children are provided with the best response and support from these services.

A workshop was held at the end of January with care experienced children and stakeholders to plan the delivery of this work.

Unfortunately, the coronavirus pandemic has significantly impacted on the delivery of this work.

A 12 week national conversation was due to be held in the spring/early summer to engage with the public and key stakeholders across the public and private sectors (including the NHS, Education, Housing, Police etc.) about their corporate parenting responsibilities.

We took steps to co-produce a voluntary Charter for our wider public sector partners to sign up to a common statement of improved support and action when working with care experienced children.

We intend to use our existing legislative powers to strengthen statutory corporate parenting guidance, clarify roles and responsibilities and extend duties across the public sector.

Whilst the coronavirus pandemic remains present, the time is not right to engage our health, education, housing and police partners about increased responsibility and support.

We will however work with our third sector partners, including Voices from Care, to co-produce the voluntary charter in readiness for the new Senedd Term, holding online engagement events with care experienced young people to ensure our plans meet their needs.

5. Criminalisation of children in care

Children's Commissioner's recommendation:

Welsh Government should develop an All-Wales Protocol that commits to preventing the unnecessary criminalisation of children in care, to complement ongoing work by local authorities, police and others to embed a rights-based and trauma-led approach their work.

The Welsh Government Response: Accept

The Welsh Government has a clear position that children involved with criminal justice systems should be considered as children first. We are committed to working with partners to prevent the unnecessary criminalisation of children in care. We will establish a working group with external stakeholders to progress work on the development of an All-Wales Protocol to promote practice that prevents the unnecessary criminalisation of children in care.

6. Youth Justice Blueprint

Children's Commissioner's recommendation:

Welsh Government and Youth Justice Partners should make urgent progress in this Senedd Term towards the ambitions and actions set out within the Youth Justice Blueprint to ensure Wales can reform its delivery of youth justice services to better meet the needs of vulnerable children in Wales.

The Welsh Government Response: Accept

The Welsh Government is committed to working with partners to ensure the best possible services are available across Wales to prevent young people from becoming involved in the youth justice system and to support the rehabilitation of young people who offend.

The delivery of the Blueprint is a key priority for Welsh Government and it has been included in the Welsh Government Continuity and Recovery plan, with planned deliverables by March 2021.

PROTECTION FROM EXPLOITATION AND VIOLENCE

7. Child Sexual Abuse statutory guidance

Children's Commissioner's recommendation:

Welsh Government need to resume work on the CSE statutory guidance at the earliest opportunity within this Senedd term to ensure a national picture is available and used to inform planning and decision making.

The Welsh Government Response: Accept

Work on a final draft of statutory guidance on safeguarding children from child sexual exploitation was delayed by the coronavirus pandemic.

However, this work has been prioritised and Welsh Government lawyers are currently considering a final draft.

Following this there will be a formal request to the Secretary of State for the Home Department of the UK Government to jointly publish the statutory guidance as Volume 7 of Working Together to Safeguard People.

We are confident the statutory guidance will be published within this Senedd term.

EDUCATION, CITIZENSHIP AND CULTURAL ACTIVITIES

8. Child abuse allegations against teaching staff

Children’s Commissioner’s recommendation:

Welsh Government should provide CCfW with the details that they have obtained through the series of correspondence noted above of each local authority’s arrangements for independent investigations into allegations of child abuse against teaching staff.

The Welsh Government Response: Accept

We wrote to local authority Directors of Education in February 2020. Unfortunately, due to the onset of the coronavirus pandemic, we received a limited number of responses.

We will write again to those we did not hear from and share the information received with the Children’s Commissioner.

In the meantime, the background to this issue is provided.

In accordance with the Staffing of Maintained Schools (Wales) Regulations 2006 (as amended) school governing bodies are required to appoint an independent investigator to investigate allegations that a person employed at the school has abused a pupil registered at the same school.

Governing bodies are free to decide who to appoint as independent investigator, subject to exclusions in the 2006 Regulations on who is not to be regarded as independent.

Local authorities are responsible for providing governing bodies with the support and training they need to carry out their roles effectively.

Welsh Government guidance *Handling Allegations of Abuse against teachers and staff* recognises that many local authorities already provide for an independent investigation of allegations, often as part of the personnel services that schools can buy in from the local authority. It emphasises the importance of ensuring schools and colleges have access to an affordable facility for independent investigation.

One way for local authorities to achieve this might be to develop reciprocal arrangements with other local authorities.

This is a matter for schools and local authorities to determine and the Welsh Government does not routinely collect or hold details of local authority arrangements for independent investigations.

9. 2020 Disciplinary and Dismissal procedures

Children's Commissioner's recommendation:

Welsh Government should clarify the governance arrangements for ensuring schools and governing bodies follow the 2020 Disciplinary and Dismissal procedures for school staff: revised guidance for governing bodies and if necessary take steps to ensure that there is clarity provided to those bodies on the arrangements in every local authority area.

The Welsh Government Response: Accept

Disciplinary and dismissal procedures for school staff is statutory guidance issued by Welsh Ministers under sections 35(8) and 36(8) of the Education Act 2002 – which means that governing bodies and local authorities **must** have regard to it.

Where mandatory requirements are imposed by statutory guidance (or by other statutory provisions) it will state that governing bodies and local authorities **must** comply with the particular requirement or provision.

Where guidelines refer to good practice, it will state that they **should** follow the particular guidelines unless they can demonstrate that they are justified in not doing so.

Local authorities have powers to intervene where a governing body has failed or is likely to fail with a duty under the Education Acts.

10. Additional Learning Needs Code of Practice

Children's Commissioner's recommendation:

The delayed and re-drafted ALN code of practice must be laid before the Senedd in order to take forward the implementation of the 2018 Act. It is also essential that additional investment in the ALN sector is not a one-off, and this must be continued as the new system develops to ensure its success.

The Welsh Government Response: Accept (additional investment accept in principle)

Throughout the coronavirus pandemic, ALN reform has remained a priority. Timelines for the commencement of the roll out of the new ALN system remain unchanged and the statutory posts (Additional Learning Needs Coordinators, Designated Education Clinical Lead Officers, and Early Years Additional Learning Needs Lead Officers) are still planned to commence in January 2021, with the rest of the new system commencing on a phased basis from September 2021.

To accompany the commencement of the statutory roles, it is intended to lay regulations on the ALN Co-ordinator role and publish guidance on all three statutory roles under the new ALN system. The guidance will include text from aspects of the revised Code related to these roles and will clarify their responsibilities. Both the guidance and regulations will be informed by the responses to the previous consultation on the draft ALN Code and the ALNCo role regulations. Furthermore, to support the implementation of the Act from September 2021, information will also be provided around the implementation and transitional arrangements.

To support the successful implementation and delivery of the new ALN system, in 2018 we committed a £20 million package of investment for the ALN transformation programme for the remainder of the Senedd term. A significant proportion of this funding is being used to support activity to develop the skills of the education workforce to ensure that practitioners will be able to effectively operate the new system and improve outcomes for learners. This includes working with our five ALN Transformation Leads to develop and implement an extensive package of training, core skills development and ongoing professional development for all practitioners.

While ALN reform continues to be a funding priority for this government, we cannot pre-judge future budgets.

11. Independent Schools

Children’s Commissioner’s recommendation:

Welsh Government should amend the regulatory framework around independent schools and the Education Workforce Council to include a requirement that all teaching staff and all school leaders in independent settings register with the Education Workforce Council (EWC).

The Welsh Government Response: Accept

We have been committed to addressing gaps identified in the regulatory framework relating to the education workforce including giving the EWC the power to impose Interim Suspension Orders, and requiring staff in independent schools to register with the EWC.

Work on the potential scope of the regulatory changes is progressing and the extent to which these changes would require primary and/or secondary legislation. At the same time, we are reviewing the position of youth workers and the adult community learning sector, and considering alternative interim measures, for example encouraging the voluntary registration of staff from independent schools with the EWC.

We will update the Independent School Standards Regulations (Wales) 2003, to ensure they are strengthened and reflect current safeguarding guidance and practice. All independent schools in Wales are required to meet the Independent School Standards Regulations (Wales) 2003.

We have published updated ‘Keeping Learners Safe’ statutory guidance following a consultation at the end of last year.

Under section 157 of the Education Act 2002 proprietors of independent schools must comply with our statutory guidance *Keeping Learners Safe: the role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002* for the purpose of meeting standards set out in regulations and exercise their functions in a way that takes into account the need to safeguard and promote the welfare of children.

ADEQUATE STANDARD OF LIVING

12. Child Poverty Review

Children's Commissioner's recommendation:

Welsh Government should publish the findings from their concluded Child Poverty Review, and set out how the findings will be turned into concrete actions that result in tangible improvements to children's lives.

The Welsh Government Response: Reject

The Child Poverty Review offered an opportunity to explore what more Welsh Government could do to ensure its programmes and services which contribute to tackling poverty were improving outcomes for children and young people. The findings arising from the Review were due to be published earlier this year.

However, since the Review was undertaken the coronavirus pandemic has had far reaching consequences for our economic and social well-being. As a result, it was felt that the findings arising from the Review did not reflect the current landscape and the decision was taken not to publish.

Mitigating the impact of the crisis for families living in poverty is urgent and necessary now. Our focus is on practical action to maximise income, help reduce essential living costs and provide support to families to build financial resilience. We are working in collaboration with our stakeholders to progress this work over the coming months. An action plan outlining the steps we will take was published on 2nd November 2020.

13. Whole school approach to well-being

Children’s Commissioner’s recommendation:

Welsh Government must implement the whole school approach to wellbeing framework across schools and communities in Wales during the 2020-21 school year and this framework should have statutory status.

The Welsh Government Response: Accept

Improving learner wellbeing is a key joint commitment for the Education and Health Ministers and part of our response to the CYPE Committee Mind Over Matter Report.

Our plans include resources and other activity to support implementation of the Framework, using the £5m Whole School Budget for 2020-21, this includes £1.252m to expand school counselling provision, including supporting the service to move online to continue to support children and young people who were affected by the coronavirus pandemic and ‘lockdown’. The consultation document highlights our intention to make the Framework statutory for local authorities and maintained schools.

14. Together for children and young people programme

Children's Commissioner's recommendation:

Welsh Government must ensure that the Together for Children and Young People Programme is properly funded into 2021-22.

The Welsh Government Response: Accept in principle

The NHS Together for Children and Young People (T4CYP) plays a key role in driving improvements in mental health support for children and young people and we continue to provide funding for the programme. Funding is currently agreed until March 2021 and funding decisions beyond that will be made in due course.

Our Together for Mental Health Delivery Plan sets out our priority areas until 2022, this includes improving the mental health and well-being of children and young people.

15. Health transitions

Children’s Commissioner’s recommendation:

Welsh Government should ensure that the new guidance on health transitions is published before the end of this Senedd term. This guidance must include clearer instructions on how Health Boards are to implement it, so that it doesn’t become ‘everyone and no one’s job’. Welsh Government should ensure the new guidance is clearly communicated to health boards to ensure leadership on this within each Board. The next government should regularly review Boards’ progress on this agenda.

The Welsh Government Response: Accept

Welsh Government consulted on draft guidance between January and July 2020, an extended period, to take account of the coronavirus pandemic and to allow health organisations the maximum amount of time to respond. Over 80 detailed responses were received, which will help inform the final version of the guidance. We are currently working through the responses with a view to publishing the guidance early next year.

16. All-age mental health services

Children's Commissioner's recommendation:

Welsh Government must also consider the findings of the review of evidence on all-age mental health services, and establish how these findings can assist an approach to transitions to adult services across health.

The Welsh Government Response: Accept

The review was discussed at the NHS CAMHS Sub Group who agreed to incorporate this work into their work plan to consider implications in more detail.

The content and conclusions of this review will also be incorporated as part of the wider NHS transitions work under recommendation 15.

17. Health Advocacy services

Children's Commissioner's recommendation:

Welsh Government should draft and consult upon guidance which clearly states the government's expectation that all Health Boards offer an independent advocacy service for children and young people who need it. The guidance should have statutory status.

The Welsh Government Response: Accept

Welsh Government will continue to work with stakeholders to produce guidance in relation to advocacy for children and young people in the health setting.

18. 'No Wrong Door' report

Children's Commissioner's recommendation:

Welsh Government and all Regional Partnership Boards in Wales should consider and respond to the recommendations of the Commissioner's 'No Wrong Door' report.

Welsh Government should direct and support RPBs to take forward a strategy to better work with and for children and young people.

The Welsh Government Response: Accept

The Welsh Government has sent a considered response to the Children's Commissioner. We will continue to support Regional Partnership Board's in implementing the recommendations in the 'No Wrong Door' report, and in their work with and for young people.

Annex A - Summary of Welsh Government Response

No.	Recommendation	Welsh Government Response
1	Following the review of safe accommodation for children and young people with complex needs there should be urgent action by Welsh Government to establish new multi-agency commissioned and resourced residential provision within Wales, which meets the needs of children and young people with complex needs.	Accept
2	Welsh Government must place extended access to Personal Advisers on a statutory footing. Whilst the Welsh Government provided local authorities with funding to ensure all care leavers up to the age of 25 can continue to access a personal adviser, we know there are variations in how this is extended and delivered. Placing this entitlement to the age of 25 on a statutory footing would protect this vital support service going forward.	Accept
3	The Welsh Government should explore how semi-independent or supported living opportunities can be developed for care leavers who do not want to, or cannot access, “When I’m Ready” placements. This would ensure young people, regardless of their type of placement, could access ongoing support beyond the age of 18.	Accept
4	Welsh Government must reform “corporate parenting” so it is the responsibility of all public organisations in Wales to ensure the best for children who can no longer live with their families.	Accept
5	Welsh Government should develop an All-Wales Protocol that commits to preventing the unnecessary criminalisation of children in care, to complement ongoing work by local authorities, police and others to embed a rights-based and trauma-led approach their work.	Accept
6	Welsh Government and Youth Justice Partners should make urgent progress in this Senedd Term towards the ambitions and actions set out within the Youth Justice Blueprint to ensure Wales can reform its delivery of youth justice services to better meet the needs of vulnerable children in Wales.	Accept
7	Welsh Government need to resume work on the CSE statutory guidance at the earliest opportunity within this Senedd term to ensure a national picture is available and used to inform planning and decision making.	Accept
8	Welsh Government should provide CCfW with the details that they have obtained through the series of correspondence noted above of each local authority’s arrangements for independent investigations into allegations of child abuse against teaching staff.	Accept
9	Welsh Government should clarify the governance arrangements for ensuring schools and governing bodies follow the 2020 Disciplinary and Dismissal procedures for school staff: revised guidance for governing bodies and if necessary take steps to ensure that there is clarity provided to those bodies on the arrangements in every local authority area.	Accept
10	The delayed and re-drafted ALN code of practice must be laid before the Senedd in order to take forward the implementation of the 2018 Act. It is also essential that additional investment in the ALN sector is not a one-	Accept (Funding Accept in principle)

	off, and this must be continued as the new system develops to ensure its success.	
11	Welsh Government should amend the regulatory framework around independent schools and the Education Workforce Council to include a requirement that all teaching staff and all school leaders in independent settings register with the Education Workforce Council (EWC).	Accept
12	Welsh Government should publish the findings from their concluded Child Poverty Review, and set out how the findings will be turned into concrete actions that result in tangible improvements to children's lives.	Reject
13	Welsh Government must implement the whole school approach to wellbeing framework across schools and communities in Wales during the 2020-21 school year and this framework should have statutory status.	Accept
14	Welsh Government must ensure that the Together for Children and Young People Programme is properly funded into 2021-22.	Accept in principle
15	Welsh Government should ensure that the new guidance on health transitions is published before the end of this Senedd term. This guidance must include clearer instructions on how Health Boards are to implement it, so that it doesn't become 'everyone and no one's job'. Welsh Government should ensure the new guidance is clearly communicated to health boards to ensure leadership on this within each Board. The next government should regularly review Boards' progress on this agenda.	Accept
16	Welsh Government must also consider the findings of the review of evidence on all-age mental health services, and establish how these findings can assist an approach to transitions to adult services across health.	Accept
17	Welsh Government should draft and consult upon guidance which clearly states the government's expectation that all Health Boards offer an independent advocacy service for children and young people who need it. The guidance should have statutory status.	Accept
18	Welsh Government and all Regional Partnership Boards in Wales should consider and respond to the recommendations of the Commissioner's 'No Wrong Door' report. Welsh Government should direct and support RPBs to take forward a strategy to better work with and for children and young people.	Accept