

Children's Rights Impact Assessment

1. Policy objectives

- *What decision are you impact assessing?*

This CRIA impact assesses the decision to cease operating the National Participation Standards (NPS) Kitemark Scheme in its current form.

Background

The [National Participation Standards](#) support good participation practice by providing guidance on how organisations should engage with children. The Standards are referenced in numerous Welsh Government policies, are embedded into [The Right Way](#) (the Children's Commissioners framework for embedding a children's rights approach into practice) and used within other award schemes such as the [Quality Mark for Youth Work](#) and locally developed schemes.

The National Participation Standards Kitemark Scheme (the Scheme) provides a voluntary quality mark for organisations that wish to highlight their good participation practice. The Kitemark Scheme is in two parts:

- (i) a Charter for organisations aspiring to adopt the Standards to demonstrate their commitment;
- (ii) and the Kitemark awarded to organisations that have successfully embedded the Standards within their practice. This involves a full assessment of the NPS criteria and sign-off by a team of national Young Inspectors.

The Scheme was paused during Covid and whilst a review into public sector take-up was undertaken.

This CRIA is impact assessing the decision of whether to cease the Scheme in its current form; the National Participation Standards remain extant as Welsh Government's promoted principles of good practice.

Anticipated impact on children's rights

Article 12 of the United Nations Convention on the Rights of the Child (UNCRC) gives children the right to have their voices heard in decisions that affect them.

Ceasing the Scheme could potentially have an indirect impact on the realisation of Article 12, 13, 15, 17 and 42 rights at a local level. However, the Kitemark Scheme is voluntary, and public bodies can apply the Standards without engaging with it.

The current Scheme affords the opportunity for a small group of Young Wales members to act as National Young Inspectors for the Scheme. This proposal could potentially impact on their rights under Articles 12, 13 and 15. However, as the Kitemark Scheme has been on hiatus for some time, there are no current National Young Inspectors in post.

Any adverse impacts would be mitigated by the following:

- Ceasing the Scheme would not affect the ability of the public sector to implement the NPS nor Welsh Government's continued endorsement and promotion of the National Participation Standards as principles of good practice for those who work with children and young people. We grant fund *Children in Wales* to promote these Standards through their core activity.
- There are alternative quality mark schemes (e.g. the Youth Work Quality Mark) which embed the NPS at a local level.
- Our grant funding to *Children in Wales* for activity which directly facilitates and supports children's participation at a national and local level including Young Wales and the Big Conversation.
- Ongoing support for participation activity at local level, through funding for the All-Wales Participation Workers Network. Officials have also recently worked with the Network to produce [guidance on writing participation strategies](#) and developed a [short film](#) to introduce children's rights and the resources available to the wider public sector.

Ceasing the Scheme in its current form is therefore anticipated to have minimal impact on children's rights.

2. Gathering evidence and engaging with children and young people

- *What existing research and data on children and young people is available to inform your specific policy? Your policy objective may impact on other policy areas – discussions with other policy teams will be an important part of the impact assessment process ensuring you have gathered a range of information and evidence.*

The review process for the Scheme concluded earlier this year with the publication of the [Review Report](#) in March 2025.

The first stage focussed on the take up of the Kitemark Scheme by the public sector. *Children in Wales* undertook stakeholder engagement with the All-Wales Participation Workers Network (AWPWN), National Young Inspectors, local authority services awarded the Kitemark, and local authorities who facilitate local young inspectors' teams.

Take up of the Scheme amongst public sector organisations was found to be low. Data from *Children in Wales* showed that between 2019 and 2023, eighteen public sector organisations signed up to the Charter and seven to the Kitemark. Although the Scheme is intended to support progression from Charter to Kitemark, in practice only one organisation made the progression. Local authorities, who have a statutory duty to promote and facilitate children and young people's participation (The Children and Families (Wales) Measure 2010) and are expected to adopt the National Participation Standards, accounted for one Charter and one Kitemark award at organisational level. The data also showed some take up from individual services within local authorities, particularly youth services, with seven Charter and three Kitemark awards. These are the services that will already be most versed in the Standards and using them on a regular basis.

The second stage of the review considered the barriers faced by public sector organisations in applying for the Scheme and evidence of the effectiveness of quality mark schemes in embedding national standards at local level.

Whilst there was support of the current Scheme amongst practitioners, the review noted limitations in the evidence gathered from the public sector in Wales, notably that as contributors were primarily from children-based services, the researchers experienced difficulties in capturing the perspectives of the wider public sector. The stakeholder views were caveated as likely to present a degree of optimism bias, as public sector organisations with lower awareness or engagement with the NPS were under-represented in the data. Where whole organisation views were provided, some cited the prohibitive resource implications of undertaking the Kitemark process as a barrier and that others considered the Kitemark unnecessary as they had invested in alternative schemes.

It found that quality mark schemes, when they are appropriately designed and resourced, can be effective in embedding national standards in local delivery. It identified features of successful schemes that would need to be applied to the Scheme in Wales for it to be effective. Successful models combine self-assessment with external scrutiny, reward progress and share good practice, while being embedded in core functions, supported by leadership, and reinforced through training, internal champions, and alignment with wider policy or statutory duties. The review also highlights the importance of infrastructure and support, including guidance, training, and networks and by involving children and young people directly in design and accountability processes.

Overall, the review found value in the concept of award and accreditation schemes but concludes that the current Scheme requires further investment, development, stronger evidence of impact, and better support structures to be effective. However, there isn't clear evidence that the Scheme has driven wider or more consistent use of the Standards across public sector organisations. Rather, the findings indicate the Scheme has reinforced and formalised existing good practice in a small number of services/ organisations already engaged in participation work.

The low take up of the Scheme amongst the public sector and the ongoing barriers to take up identified by senior leaders has led us to conclude that the current Scheme is not viable. Moreover, the Scheme only provides accreditation for one aspect of a children's rights approach - this is inconsistent with the Children's Commissioner's more comprehensive approach in *The Right Way* of five principles of embedding, equality, empowering, participation and accountability.

If a quality mark scheme was to be reintroduced it would need to be considered in the context of any future human rights legislation and new duties on public bodies.

- *Using this research, how do you anticipate your policy will affect different groups of children and young people, both positively and negatively? Please remember policies focused on adults can impact children and young people too.*

Ceasing the Scheme could have a potential differential impact at local level, with children in areas that have previously achieved the Kitemark perceiving a lessening of the importance of participation. A mitigation will be to ensure that communications on any decision to cease the Scheme will emphasise that the status of and commitment to the NPS is unchanged. *Children in Wales* will continue to promote the NPS through their core grant activity, alongside a refreshed visual design of the NPS and ongoing support for Local Authority participation workers.

- *What participatory work with children and young people have you used to inform your policy? If you have not engaged with children and young people, please explain why.*

Children in Wales undertook stakeholder engagement with the National Young Inspectors who were in post at the time. The Young Inspectors reported that evidence provided to support Kitemark applications was often lengthy and unfocused, making it difficult for them to assess. There was a desire to simplify and clarify current processes.

Whilst efforts were made to consult with previous Young Inspectors, or those who would have familiarity with of the Scheme, in the second stage, this was not possible. It was decided that engaging the general Young Wales membership or wider children and young people would not be meaningful, given the specific scope and purpose of the research into the take up and operation of the Scheme.

However, the review did engage directly with representative children's organisations, including:

- Children's Rights Advisory Group (CRAG), which included representatives from the Children's Commissioner's office, *Children in Wales*, Unicef and the Human Rights Observatory at Swansea University.
- Members of the All-Wales Participation Workers Network (AWPWN) whose membership is drawn from local authorities
- *Children in Wales*, a representative body for the children's third sector in Wales and the operators of the current Scheme.

These stakeholders expressed a mixed response. During the first stage, CRAG focussed on implementation and how barriers to implementation, recording and monitoring could be addressed. Their view was that a children's rights approach was best achieved through targeting *The Right Way* to public sector leaders, to support their participation duties. *Children in Wales* highlighted differences in organisation and resourcing across Local Authorities and a desire to simplify and clarify the process. They recommended an enhanced model, with a 'National' award to include bodies other than Local Authorities.

3. Analysing the evidence and assessing the impact

- *Using the evidence you have gathered, what impact is your policy likely to have on children and young people? What steps will you take to mitigate and/or reduce any negative effects?*

Ceasing the Scheme in its current form is assessed to have a minimal impact on children and young people as endorsement and promotion of the NPS as principles of good practice for those who work with children and young people will continue.

Mitigations include:

- *Children in Wales* are grant funded to continue promoting the [National Participation Standards](#) through their core activity work.
 - There are alternative schemes which embed the NPS and would continue to serve this function. This includes the Children's Commissioner's *The Right Way Approach*, the Quality Mark for Youth Work, and locally developed schemes.
 - Our grant funding to *Children in Wales* for activity which directly facilitates and supports children's participation at a national and local level including Young Wales and the Big Conversation.
 - Ongoing support for participation activity at local level, through funding for the All-Wales Participation Workers Network. Officials have also recently worked with the Network to produce [guidance on writing participation strategies](#) and developed a short film to introduce children's rights and the resources available to the wider public sector.
- *How does your proposal enhance or challenge children's rights, as stipulated by the UNCRC articles and its Optional Protocols? Please refer to the [articles](#) to see which ones apply to your own policy.*

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
Article 12 (right to have a say on issues that affect them)	X	X	Ceasing the Scheme removes a potential mechanism for promoting children's right to be involved in decisions that affect them and for organisations to demonstrate commitment to strengthen participation practice. Similarly, a small number of potential National Young Inspectors will lose the opportunity to be involved in the accreditation process and hold organisations to account. However, the low take up and mixed views on the value of the Scheme and the continuation of the

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
			NPS and existing measures to support Article 12 rights mean the impact will be small. <i>Children in Wales</i> will continue to promote the NPS through their core grant activity, alongside a refreshed visual design of the NPS and targeted support for LA participation workers e.g. officials have recently worked with the All Wales Participation Workers Network to produce guidance on writing participation strategies and developed a short film to introduce children's rights and the resources available.
Article 13 (right to get and share information) and 17 (Right to reliable information)	X	X	Ceasing the Scheme removes a potential mechanism for promoting the benefits of organisations putting in place forums for children to get and share information to facilitate their Article 12 rights. However, organisations at local and national level in Wales do provide these opportunities without engaging with the Scheme (e.g. Local Authority Youth Councils and Forums; Health Board Advisory Panels; School Councils; Children's Commissioners Ambassadors, Young Wales, Wales Youth Parliament). The low take up and mixed views on the value of the Scheme and the continuation of the NPS and existing measures to support Article 13 rights mean the impact will be small. Any changes to the Scheme will be communicated to Young Wales members in an accessible manner.

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
			A children and young people's version of the independent review is also published here .
Article 15 (right to meet together and join groups and organisations)		X	Ceasing the Scheme removes a potential mechanism for promoting the benefits of public bodies putting in place forums where children could meet. However, the low take up and mixed views on the value of the Scheme and the continuation of the NPS mean the impact will be small. Young Inspectors previously met twice a year at Young Wales residential events. Ending the Scheme is a potential risk to children's right to meet and join groups for this small group. However, we continue to provide funding for Young Wales which supports them to meet regularly and mitigates this risk.
Articles 28 & 29	X	X	The Young Inspector model provided opportunities for young people to learn and develop new skills and confidence. However, this model benefited a small group of children and young people. The independent review also identified concerns of how representative this group was. The reallocation of these dedicated resources to supporting the wider activity of Young Wales will provide opportunities for more children and young people to develop new skills. The activities of the programme

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
			focus on developing young people involved as leaders and empowering them to make informed contributions to policy development. All volunteers are able to participate in wider training and accreditation opportunities throughout the year.
Article 42 (the government should make the Convention known to all parents and children)	X	X	Ceasing the Scheme removes a potential mechanism for government and public sector organisations to promote public understanding of the participation elements of the UNCRC. However, there are alternative schemes in existence such as the Children's Commissioner's <i>The Right Way Approach</i>, the Quality Mark for Youth Work, and locally developed schemes which support this function. A key message from stakeholders was duplication and lack of integration across different inspection systems. Removal of the Kitemark Scheme would go some way to addressing this issue of duplication. Moreover, ceasing the Scheme would not affect endorsement and promotion of the NPS as principles of good practice for those who work with children and young people. <i>Children in Wales</i> will continue to promote the NPS through their core grant activity, alongside a refreshed visual design of the NPS and support for Local Authorities to meet their participation duties.

- *Consider whether any EU Citizens Rights (as referenced in the Equality Impact Assessment) relate to young people up to the age of 18.*

Not applicable

4. Ministerial advice and decision

This CRIA will accompany Ministerial Advice.

5. Publication of the CRIA

The CRIA will be published on the Welsh Government website, following a ministerial decision and notification of this decision to relevant stakeholders.

6. Communicating with Children and Young People

- *If you have sought children and young people's views on your proposal, how will you inform them of the outcome?*

A children and young people's version of the review was produced and published [here](#).

Direct communication with Young Inspectors is not possible because any past Young Inspectors have now moved on from Young Wales since the Scheme's pause in 2023. However, any decision on the future of the Scheme will be communicated to the broader Young Wales membership in an accessible manner.

7. Monitoring and Review

- *Please outline what monitoring and review mechanism you will put in place to review this CRIA.*

The CRIA will be kept under review and be considered in the context of any future human rights legislation and new duties on public bodies.

- Following this review, are there any revisions required to the policy or its implementation?