

Children's Rights Impact Assessment

1. Policy objectives

- What decision are you impact assessing?

This following impact assessment links to the published children's rights assessment for the regulation changes to improve adoption, fostering, kinship care and special guardianship services in Wales. This published assessment can be found at <https://www.gov.wales/improving-adoption-fostering-and-kinship-services-childrens-rights-impact-assessment>

The Welsh Government's proposed changes to the [Part 6 Code of Practice \(Looked After and Accommodated Children\)](#) and the [Code of Practice](#) on the exercise of social services functions in relation to special guardianship orders aim to support consistency of children's services as part of a wider transformation of children's services in Wales.

These proposals aim to strengthen support for vulnerable children and their families and include the following key changes:

- **Improve alignment between Part 6 and Part 4 frameworks:** The proposed changes will strengthen alignment between Part 6 (looked after and accommodated children, including adoption) and Part 4 (care planning, placement and review) of the 2014 Act, providing clearer and more integrated guidance for practitioners where a child's care plan is for adoption.
- **Enhancing consistency in adoption planning and decision-making:** The proposals introduce stronger, more detailed guidance to support consistent adoption planning across Wales, including incorporation of the Welsh Early Permanence (WEP) Framework to enable earlier and more effective permanence decisions in practice.
- **Introducing greater flexibility in kinship care arrangements:** The changes reflect new regulatory provisions allowing more flexible review and visiting arrangements for fully approved kinship foster carers, enabling approaches to be tailored to individual children and families while maintaining appropriate safeguarding oversight.
- **Clarifying access to the enhanced fostering allowance:** The proposals provide clearer and more consistent guidance on how all types of foster carers including mainstream, kinship, and temporarily approved carers, can access the enhanced fostering allowance, promoting transparency and equity across the system.
- **Special Guardianship Support Plans:** A statutory requirement for local authorities to use nationally developed support plan templates to ensure

consistency and quality of support for special guardians and the children in their care.

- **Corporate parenting:** The purpose of the chapter will be to provide additional guidance for local authorities in their role as corporate parents. This chapter covers:
 - the setting up of corporate parenting panels supported by care-experienced young people.
 - the role of corporate parents in providing information to care-experienced children and young people when in care and also when leaving care.
 - Examples of how local authorities can report progress in delivering their role as corporate parent.
- **Strengthening the importance of the voice of the child:** The proposed changes strengthen the importance of listening to the voice of the child in various processes.
- **Strengthened guidance on the undertaking of moves and review meeting:** The proposed changes refer to the handling of looked after children's personal belongings and avoiding where possible the use of black bags in placement moves. In addition, trying to avoid holding review meetings during lesson times.
- **Updated terminology and legislation:** Since the last update of the Part 6 Code took place in April 2018 there have been some terminology and legislation changes. There are a number of proposed changes to the Part 6 Code to reflect these changes.

The proposed changes are designed to improve outcomes for children by enhancing the quality, accessibility, and consistency of care and support services. They strengthen the recognition that all children under 18 are entitled to their rights (Article 1) and ensure these rights are upheld without discrimination (Article 2).

The proposals reinforce the best interests of the child as a primary consideration (Article 3), while recognising the importance of parental and family relationships (Article 5) and supporting children's development, health, and wellbeing (Articles 6 and 24). They also promote children's identity, including cultural and linguistic identity (Articles 8 and 30), and uphold their right to express their views and receive accessible information to inform decisions about their lives (Articles 12 and 13).

In strengthening support for carers and services (Article 18), the changes also contribute to protecting children from harm (Article 19) and ensuring appropriate care arrangements for those who cannot live with their families (Article 20), including effective and stable adoption processes (Article 21). The proposals recognise the specific needs of disabled children (Article 23) and aim to ensure access to adequate financial support and living standards (Articles 26 and 27), as well as education and development opportunities (Articles 28 and 29).

Furthermore, they reinforce the importance of regular review of care arrangements (Article 25) and provide frameworks that support children to recover from trauma and achieve successful reintegration (Article 39). Collectively, these changes promote stability, continuity, and holistic support, ensuring that care experiences enable children to feel safe, respected, and supported to achieve positive outcomes.

2. Gathering evidence and engaging with children and young people

Existing Research and Data

Adoption, Fostering and Kinship Care

The Welsh Government's changes are informed by a range of existing research, sector feedback, and commissioned studies. Key sources include:

- Feedback from children's social services professionals across Wales, highlighting challenges in adoption, fostering, and kinship care through various forums and special interest groups.
- Research commissioned by Welsh Government on Special Guardianship disruption (2020), which highlighted the importance of consistent support planning: [Special Guardianship Disruption in Wales: An Exploratory Study](#)
- Practice insights from AFKA Cymru including the development of support plan templates ([Resource Hub - AFKA Cymru](#)) and engagement with local authority practitioners in regular special interest groups.

These sources provide a strong evidence base for the proposed changes, particularly in identifying gaps in service provision, inconsistencies in practice, and the need for more flexible, child-centred approaches.

Engagement included organisations representing children and young people across adoption and fostering such as the National Adoption Service, Regional Adoption Collaboratives in Wales, Voluntary Adoption Agencies, Foster Wales, Kinship Cymru, and AFKA Cymru's Special Interest Group for Special Guardians and Kinship Carers. Engagement was undertaken through a combination of workshops, stakeholder meetings, and ongoing special interest groups, where stakeholders were invited to provide feedback on emerging policy proposals and highlight practical challenges. This feedback was used to inform the development of the proposed changes, including identifying areas where greater clarity, consistency and flexibility in practice were required.

Feedback to support consideration of changes to adoption regulations has been provided through the National Adoption Service, which supports Adoption UK Cymru to operate the 'CONNECT Voices' youth council. The 'CONNECT Voices' youth council brings together care-experienced young people, including those with experience of adoption, to provide a forum for sharing views and perspectives on the system. Themes identified through this route have included the importance of

stability and being listened to in decision-making, which have been considered alongside wider evidence in the development of the proposals.

Members of the kinship special interest group were able to seek views from the children and young people they looked after to gain feedback. Through this engagement, children and young people in kinship care expressed a preference for arrangements that recognised the distinct nature of kinship arrangements. This feedback was considered in the development of proposals relating to the assessment and review of kinship foster carers, with the intention of ensuring these processes are more proportionate and reflective of family-based care.

It also became clear that young people in kinship care felt that being treated as “looked after” under the current system was disproportionate and stigmatising. They wanted recognition of family-based care as distinct from mainstream fostering processes. Listening to the voices of children, young people and service users directly informed proposals to introduce a tailored assessment framework for kinship foster carers and more flexible review arrangements.

Overall, research, engagement and practice insights from stakeholders who work alongside and represent children, including feedback on children’s experiences, have enabled policy officials to develop the proposals outlined in the consultation. [Corporate Parenting, Strengthening the Voice of the Child and guidance around moves and placements](#)

The Welsh Government’s changes are informed by a range of existing research and sector feedback. Key sources include:

[The Lwc report/Enya project](#): The Children’s Commissioner for Wales office took part in a pan-European piece of work with the European Network of Ombudsperson for Children (ENOC) which focused on Alternative Care. They worked with the Hope girls in Neath Port Talbot to participate in the European Network of Young Advisors (ENYA). The resulting work developed into the Lwc report and exhibition, with five recommendations. [Lwc | Luck: The Experiences of Care Experienced Young People - The story so far - Children’s Commissioner for Wales](#)

[Radical Reform Summits and Declaration](#): The annual Care Leavers Summits which have taken place during this Senedd term. The focus of the Summits is about making sure children and young people’s voices are heard. At the Summits the children and young people choose what they talk about and get to ask the questions and say what they think. The resulting [Care Experienced Summit Declaration](#) outlines young people’s vision for children’s social services in Wales. The conversations and engagement between Ministers and young people and the declaration and have provided the evidence to inform the proposed changes to the part 6 Code of Practice.

[Children, Young People and Education \(CYPE\) Committee’s inquiry into radical reform](#): The CYPE committee undertook an inquiry into radical reform of children’s services. The resultant report *If not now, then when* details the research and evidence supporting then need for radical reform of children’s services in Wales and put forward recommendations to Welsh Government. A copy of the full report and

supporting evidence can be found at: [Services for care experienced children: exploring radical reform](#)

My Things Matter campaign: The National Youth Advocacy Service campaign which has undertaken research and developed a campaign for improved support and respect for care-experienced children and their belongings when they move, across England and Wales. [My Things Matter | Supported by Madlug Bags | NYAS](#)

The Corporate Parenting Charter is based on of how we can all work together to support and improve outcomes for care-experienced children and young people to have those life chances they deserve. The [Charter](#)'s principles and promises align to the United Nations Convention on the Rights of the Child (UNCRC).

Anticipated Impact on Children and Young People

The proposals are expected to have a positive impact on most groups of children and young people, particularly those who are:

- **Looked after or adopted:** Strengthened corporate parenting, improved care and support planning, and clearer alignment between adoption and care planning frameworks are expected to support better decision-making, improved stability, and more consistent long-term outcomes.
- **Experiencing care planning and review processes:** Enhanced guidance on multi-agency working, review processes, and the role of the Independent Reviewing Officer (IRO) will support more effective oversight, better coordination of services, and stronger consideration of the child's needs and views.
- **Experiencing placement moves:** Improved guidance on placement transitions, including the handling of personal belongings, is expected to promote emotional wellbeing, dignity, and continuity of care during periods of change.
- **Living in kinship care arrangements:** Greater flexibility in review and visiting arrangements will allow a more proportionate, tailored approach that reflects family circumstances, reduces unnecessary intrusion, and supports placement stability while maintaining safeguarding.
- **Subject to adoption planning and early permanence decisions:** Enhanced clarity and consistency in adoption planning, including the incorporation of the Welsh Early Permanence (WEP) Framework, will support timely, well-informed decisions and earlier achievement of stable, permanent homes.
- **Supported by foster carers:** Clearer guidance on access to the enhanced fostering allowance will improve transparency and consistency, supporting carers to meet children's needs effectively and contributing to placement stability.

- **Living with special guardians:** The introduction of standardised special guardianship support plan templates will provide a more consistent, structured, and equitable approach to assessing need and delivering support across Wales.

While the proposals are expected to have predominantly positive impacts on children's rights, there are some potential risks that should be considered. Increased flexibility in review and visiting arrangements for kinship foster placements could lead to inconsistent application across local authorities, which may affect some children's right to consistent oversight and safeguarding if not carefully managed. There is also a risk that variations in practice or resource constraints could limit the extent to which improved care planning and adoption frameworks are fully realised in practice, potentially impacting children's experiences and outcomes.

In addition, while efforts to streamline processes and reduce unnecessary intrusion are positive, there remains a risk that this could unintentionally reduce opportunities for children's voices to be heard or for concerns to be identified early, particularly where professional contact is reduced.

These risks can be mitigated by ensuring clear national guidance, strong safeguarding thresholds, and consistent implementation across Wales. Ongoing monitoring and evaluation, alongside the strengthened role of the Independent Reviewing Officer (IRO), will help ensure that children's views continue to be heard and that their best interests remain central to all decisions. Access to advocacy and support services should also be maintained and strengthened to ensure that all children can effectively exercise their rights.

Engagement with Children and Young People

Adoption, Fostering and Kinship Care

While the proposed changes have undergone extensive engagement with professionals and stakeholders who represent children and young people, the Welsh Government has not undertaken direct participatory work with them due to the technical nature of the proposals. These are complex and not easily accessible to children without specialist knowledge. Instead, we relied on organisations representing children's voices to ensure their perspectives informed policy development. These organisations routinely engage with children and young people as part of their ongoing work, and their contributions to this process were informed by their knowledge of children's experiences and views.

The proposals do respond to feedback from young people in kinship care, who have expressed concerns about the disproportionate impact of the looked after system on their placements. This reflects views gathered through stakeholder engagement and representative groups, where children's experiences had been shared with and communicated by these organisations.

Corporate Parenting, Strengthening the Voice of the Child and guidance around moves and placements

In addition to the Care Experienced Summit referred to above, care-experienced children and young people are represented and participate on the Transformation Programme Delivery Group and the Corporate Parenting Implementation Group. Through these meetings, young people have fed back on their experiences of services and what they would like to see in particular accountability and how local authorities will report on progress in delivering corporate parenting and improved access to information on rights and entitlements when young people leave care. The proposed changes to the Part 6 Code of Practice have been developed in collaboration with the Corporate Parenting Implementation Group and have responded to feedback from the young people on the Group.

Young People took an active role in the first Corporate Parenting Best Practice Event which took place in February 2025. At the event they led a discussion on the importance of corporate parenting to them and their messages hit home for attendees. They reflected on their hope that Corporate Parenting will challenge and change the landscape for care experienced children and young people, with a plea that not only do organisations listen to the voices of the child but also deliver on their corporate parenting pledges.

During the public consultation on the proposed changes to the Part 6 Code of Practice, an engagement and participation session took place with care-experienced young people on the proposals specifically on corporate parenting. The feedback was positive on the proposals with young people keen to have access to information in formats which will be easily accessible to them such as apps and books, that they wanted corporate parents to be accountable on delivery and to share information on progress.

The new chapter on corporate parenting aims to answer this feedback by:

- Providing guidance to local authorities to set up corporate parenting panels supported by care-experienced young people.
- Detailing the role of corporate parents in providing information to care-experienced children and young people when in care and also when leaving care.
- Providing examples of how local authorities can report progress in delivering their role as corporate parent.

3. Analysing the evidence and assessing the impact

Adoption, Fostering and Kinship Care

Using the evidence gathered from research, stakeholder feedback, and sector engagement, the policy changes are likely to have a broadly positive impact on children and young people across Wales, particularly those who are looked after, adopted, or living in kinship care arrangements.

Positive Impacts

- **Improved consistency in adoption planning and decision-making:**
Strengthening alignment between Part 6 (adoption) and Part 4 (care planning) frameworks will provide clearer, more consistent guidance for practitioners. This is expected to support better informed decisions and improve stability and long-term outcomes for children whose care plans include adoption.
- **Earlier permanence and improved stability:**
Incorporation of the Welsh Early Permanence (WEP) Framework will support more timely decision-making and earlier placement in stable, permanent homes, reducing uncertainty and promoting children's wellbeing.
- **More proportionate and child centred kinship care arrangements:**
Greater flexibility in review and visiting requirements for kinship foster carers will enable approaches to be tailored to the needs of individual children and families. This is expected to reduce unnecessary intrusion, support family relationships, and promote placement stability while maintaining safeguarding.
- **Improved support for foster carers:**
Clearer and more consistent guidance on access to the enhanced fostering allowance will support carers to meet children's needs effectively, contributing to more stable placements and improved outcomes for children in foster care.
- **Greater consistency in support for special guardianship arrangements:**
The introduction of statutory national support plan templates will promote a more structured, equitable, and transparent approach to assessing need and delivering support, ensuring children and families receive consistent levels of support regardless of location.

Potential Negative Effects and Mitigation

- **Risk of inconsistent application of flexibility:**
Increased flexibility in kinship care arrangements may lead to variation in how local authorities apply review and visiting requirements, potentially impacting consistency in safeguarding and oversight.

Mitigation: Clear national guidance, ongoing monitoring, and strengthened oversight processes (including review mechanisms) will help ensure flexibility is applied appropriately and consistently.
- **Implementation challenges for practitioners:**
Introducing revised frameworks and new requirements (including alignment of adoption processes and use of support plan templates) may create transitional challenges, particularly where training or capacity is limited.

Mitigation: Provision of clear guidance, practitioner training, and ongoing support will be essential to ensure effective implementation.

- **Potential for variation in access to support:**

While guidance is strengthened, there remains a risk that differences in local practice could affect how consistently enhanced allowances or support plans are applied.

Mitigation: The introduction of clearer guidance and statutory requirements is intended to reduce variation, supported by monitoring and national oversight.

Overall, the proposals are designed to strengthen children's rights to stability, appropriate support, and consistent decision-making within the care system. While some risks relating to implementation and consistency remain, these are recognised and can be mitigated through clear guidance, training, and robust oversight, ensuring that the best interests of children remain central to all decisions.

Corporate Parenting, Strengthening the voice of the child and guidance around moves and placements

Using the evidence gathered and outlined above, the planned changes to the Part 6 Code of Practice relating to corporate parenting, voice of the child will have a positive impact on care-experienced children and young people. The additional corporate parenting section in the Part 6 Code of Practice and strengthening the voice of children and young people in the Code will enhance children's rights.

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
Article 1 – definition of child - everyone under 18 has rights	Awareness of the right of children to have their voice heard in decisions about them.	Technical nature of some discussions and ensuring understanding.	The purpose of the changes is to strengthen the voice of the child in several areas in the Part 6 Code of Practice – such as placements, moves and review meetings. In addition, the new corporate parenting guidance will support delivery of the Equality principle within the Corporate Parenting Charter which aligns to article 1.
Article 2 - Non discrimination.	Recognition of children and young people for who they are. Promotes equitable access	Technical nature of some discussions and ensuring understanding. Risk of unequal access if processes	The Part 6 Code of Practice sets out the duties for local authorities in relation to looked after and accommodated children. The work

	through consistent adoption planning, SG frameworks, and clearer financial support across Wales	are complex or inconsistently applied locally	specifically around corporate parenting includes a principle to eradicate stigma – recognising young people for who they are, not just by their experience of being in care. National consistency measures) and clearer allowance processes aim to reduce postcode variation but will depend on fair implementation.
Article 3 – Best interests of the child	Alignment of planning, early permanence, and structured frameworks support better, timely decision-making. Enhancing the information available to young people after leaving care.	Over-reliance on process or templates could limit personalised, child-centred decisions. The development of consistent information on a national and local level.	The proposals aim to improve care planning, placement stability, and access to support services, ensuring decisions are made in the child's best interests. Statutory duties will ensure high quality services. All proposals aim to strengthen best-interest decisions, but effectiveness depends on maintaining flexibility alongside structure. The proposed changes will look to develop a national information platform for children in care and also care leavers. This will link with local level information resources. This work will raise awareness of the support and information available after leaving care acting in the children's best interests.

Article 5 – Parental guidance and a child’s evolving capacities	Supports kinship carers and special guardians by recognising their caregiving role and autonomy	Reduced oversight may limit professional support where risks or complexities exist	Flexible kinship arrangements and Special Guardianship Support plans shift balance towards family responsibility, requiring appropriate support safeguards
Article 6 – Life, Survival and Development	Early permanence supports stability and long-term emotional development.	Decisions made too early may not fully consider long-term developmental needs.	The WEP framework promotes early stability, supported by improved planning, but must avoid premature decisions.
Article 8 – Protection and Preservation of Identity	Kinship care helps preserve family identity and continuity.	Adoption/early permanence may weaken links to birth family if not carefully managed.	Kinship care supports cultural and familial identity, while permanence decisions must carefully balance stability and identity.
Article 12 – Respect for the Views of the Child	Strengthened planning processes create opportunities to include children’s views. Enhancing children’s rights to be heard and listened to.	Technical nature of proposals may limit direct engagement. Ensuring children and young people’s views and integral to service delivery.	Strengthening the voice of the child in care planning and review processes, particularly through updates to the Part 6 Code of Practice. Proposals for more flexible review arrangements for kinship care include consultation with the child and family before determining visit frequency. Children will be invited to contribute to the design and content of child-friendly publications explaining the changes. The proposed changes support the setting up of corporate parenting panels which would work with young people in their area in the development and delivery of services.

Article 13 – Freedom of Expression - Right to receive information	Commitment to child-friendly communication formats. Children and young people's access to the right information and supported to share their views.	Risk of inadequate communication for children with different needs. Provision of the accessible information in the right format.	The policy will ensure local authorities and agencies are required to provide updates in child-friendly formats and through multiple channels which includes linking in with adoption youth councils, the Connect Group and looked after children's Thrive magazine, which takes into account children's diverse communication needs such as language, disability, and cultural and well-being contexts. As above, the proposed changes support the establishment of corporate parenting panels and their engagement with young people. The panels would share information on progress with corporate parenting and provide a forum to share views .
Article 18 – Parental responsibilities and state assistance - Support to carers	Financial support and structured plans strengthen carers' ability to meet children's needs	Barriers to accessing allowances or inconsistent support may reduce effectiveness.	Allowances, Special Guardianship support templates and kinship flexibility all enhance support, but access must be simple and consistent.

Article 19 – Protection from violence, abuse, neglect	Safeguarding duties remain statutory.	Increasing flexibility in care review arrangements could result in inconsistent practices across local authorities, creating gaps in identifying and addressing risks of violence, abuse, or neglect.	The policy maintains statutory safeguarding duties and commissioning checks to protect children from harm. Mitigation is considered sufficient as statutory safeguarding duties remain.
Article 20 – Children unable to live with their Family	Enhancements to adoption, fostering, and kinship care frameworks strengthen stability for children who are looked after by introducing a distinct tailored assessment and review processes for kinship arrangements, reducing stigma and unnecessary bureaucracy. Statutory Special Guardianship Support Plan templates and the inclusion of the Early Permanence Framework in the Code ensure consistent, high-quality support and minimise placement disruption and trauma. A child or young person's right to be looked after.	Introducing a flexible review arrangements for kinship arrangements could lead to inconsistencies in implementation across local authorities, risking uneven standards of care. Statutory use of Special Guardianship Support Plan templates and Early Permanence practices may strain resources and workforce capacity, requiring robust monitoring to avoid gaps in support. The different placements	Enhancements to adoption, fostering, and kinship care frameworks support children who are looked after, ensuring appropriate and stable placements. Introduction of a distinct category for kinship foster carers with tailored assessment and review frameworks to reduce stigma and bureaucracy. Special Guardianship Support Plan templates become statutory to ensure consistent, high-quality support for children in permanent family arrangements. Early Permanence Framework referenced in the Code to minimise placement disruption and trauma. One of the key principles of corporate parenting as outlined in the corporate parenting charter is a

		available to children and young people.	Stable Home. Corporate parenting is about providing stable places to live that are right for all care.
Article 21 – Adoption	Better adoption support and planning. A child or young person's right to be looked after	Focus on speed (early permanence) may risk insufficient exploration of options. The different placements available to children and young people.	Alignment, consistency, and WEP streamline adoption but must retain safeguards for thorough decision-making. One of the key principles of corporate parenting as outlined in the corporate parenting charter is a Stable Home. Corporate parenting is about providing stable places to live that are right for all care.
Article 23 – Children with a Disability	Templates include tailored support for disabled children. Corporate Parenting and strengthening the voice of the child is applicable for all children.	Risk of tailored specialist provision not being readily available for families that need it. Ensuring all children and young people's views and integral to service delivery.	The policy supports this right by requiring nationally developed support plan templates that include tailored provisions for disabled children and their carers. These tailored templates will include an assessment of disabled children's care and support needs. This ensures consistency and quality in meeting additional needs within care arrangements. These changes are about ensuring consistency and quality of support, services and information for all children and young people.

Article 24 - Health and Health Services	The right to health care and advice needed to support the best physical, mental health and general well-being for all care-experienced children and young people.	Timely access to health care services.	All local health boards have signed up to the Charter and will work in partnership with local authorities to deliver.
Article 25 – Review of treatment in care	The policy enhances this right by introducing clearer and more flexible review arrangements for kinship care and maintaining oversight through statutory duties. This ensures that children's care plans are regularly assessed and adapted to meet their individual needs. The introduction of the Special Guardianship support template will provide a coherent framework for the provision of tailored support for the family.	Greater flexibility in review arrangements could lead to inconsistencies in how care reviews are conducted across different local authorities. Additionally, reduced regulatory oversight may weaken accountability for ensuring that children's needs are fully addressed during these reviews. Risk of inconsistent interpretation of the SGO template across local authorities.	Proposals for more flexible review arrangements for kinship care still maintain oversight, tailored to the child's needs and as they grow older becoming more reactive to evolving or changing circumstances. By adding a statutory requirement for a SGO template for all local authorities to use the templates will ensure a consistent approach across Wales. This will promote equity and clarity. Their portability between local authorities will improve continuity of care and reduce duplication.
Article 26 – Right to benefit from social security	Clearer guidance on enhanced fostering allowances which aims to strengthen financial support available to	Variation in implementation by local authorities could affect access to allowances.	The policy strengthens financial support for children by clarifying access to enhanced fostering allowances and ensuring consistency through statutory guidance. This helps

	families The policy clearly outlines how temporarily approved carers can be assessed against local authorities' eligibility criteria for an enhanced allowance.		families in need to maintain stability and meet children's essential needs, reducing the risk of financial hardship.
Article 27 – Adequate standard of living	Clarifies access to enhanced fostering allowances and introduces statutory templates for support plans, ensuring financial and practical stability for children in care. These measures help carers meet children's essential needs and maintain a consistent standard of living across care arrangements.	While the policy clarifies access to enhanced fostering allowances, there is a risk of inconsistent implementation across local authorities, which could lead to unequal financial support for families. Additionally, increased demand on services without adequate funding may strain resources, potentially impacting children's standard of living.	Clarification of access to enhanced fostering allowances supports financial stability for carers, which benefits children's wellbeing.
Article 28 and 29 - Right to an education	The changes will enhance care-experienced children and young people's right to an education	Clear guidance in place to support this – changes link to another consultation on guidance on Personal Education Plans (PEPs).	The changes support the article to provide a Good Education. Providing opportunities and support for all care-experienced children and young people to learn/develop and help them become who they want to be. This is because all children have a right to an education (Article 28 and 29).

Article 30 – Children from minority or indigenous groups - Right to learn and use family language	Recognition of cultural and linguistic needs of children within placements.	Insufficient guidance could overlook language needs.	The policy supports this right by promoting culturally sensitive placements and encouraging recognition of family language needs within adoption, fostering, and kinship care arrangements. Guidance and support planning templates will help ensure that children maintain their linguistic and cultural identity wherever possible.
	Recognition of cultural and linguistic needs in placements.	Insufficient guidance could overlook language needs.	The changes supports this right by promoting culturally sensitive information and support encouraging recognition of family language needs.
Article 39 – Recovery from trauma and reintegration	The proposals support recovery by promoting early permanence, stability, and consistency in care planning and adoption processes. They strengthen children's ability to form secure attachments, reduce delay, and ensure access to structured, needs-based support (including financial support and Special Guardianship planning), all of which are essential for recovery and reintegration	There is a risk that increased flexibility in practice and any lack of clarity in guidance (e.g. around visiting arrangements or financial entitlements) could lead to inconsistent implementation, potentially weakening safeguarding oversight or limiting access to support, which may negatively affect children's recovery environments	The changes significantly align with Article 39 by improving stability, support, and therapeutic care pathways. However, their effectiveness depends on clear guidance, consistency, and strong oversight to ensure all children benefit equally The corporate parenting approach which is supported by these changes will improve access to therapeutic services for care experienced children and young people and improve wellbeing.

	Improved access to therapeutic services for children and young people, adopted adults and families supports recovery and emotional wellbeing, while removing barriers to adoption-related counselling for adults indirectly benefits children by strengthening family stability and wellbeing.		
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These proposals are designed to uphold and enhance children's rights by improving the systems that support their care, protection, and development.

The proposals have been reviewed against UNCRC concluding observations and general comments to ensure alignment with international best practice, in particular the section on children deprived of a family environment (paragraphs 37-38) which has links to the work on corporate parenting being taken forward. Also in consideration of children deprived of a family environment, the proposals aim to improve consistency, stability and proportionate, child-centred arrangements.

The proposed changes support the application of the best interest's principle (paragraph 21) through strengthened expectations around assessment, care planning and review processes. They also reinforce the importance of seeking and taking into account children's views in decisions affecting them, in line with recommendations on access to justice and remedies (paragraph 17) and respect for the views of the child (paragraph 23).

The UN General Comments considered, included paragraphs 6, 12 and 14 and no direct relevance to the proposals were found.

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

The proposed changes outlined in the Welsh Government's consultation documents do not directly reference EU Citizens' Rights in relation to children and young people. However, it is important to consider how these rights may be relevant, particularly for children and young people up to the age of 18 who are EU nationals or have family members who are EU citizens living in Wales.

Relevant Considerations:

- **Access to social care services:** EU children living in Wales should have equal access to adoption, fostering, kinship care, and special guardianship services. The proposed changes such as improving care planning, increasing access to support services, and clarifying eligibility for enhanced fostering allowances must be implemented in a way that does not disadvantage children based on their nationality or immigration status.
- **Safeguarding and placement stability:** EU children in care may face additional vulnerabilities, such as language barriers, cultural differences, or uncertainty around residency status. The proposals to improve placement stability could help ensure that EU children are placed in safe, culturally appropriate environments.
- **Right to family life and continuity of care:** Under EU Citizens' Rights and the UNCRC, children have the right to maintain contact with family members. Proposals that improve support for kinship care and adoption-related contact arrangements may enhance this right, particularly for children separated from family due to migration or care proceedings.

While the proposals do not explicitly address EU Citizens' Rights, they should be implemented in a way that ensures non-discrimination, equal access, and protection of rights for all children, including those who are EU nationals or have EU family connections. This includes ensuring that immigration status does not become a barrier to receiving care, support, or financial assistance under the revised frameworks.

4. Ministerial advice and decision

The analysis of these impacts will be included in the Ministerial advice to seek agreement to the publication of the analysis of the public consultation responses and the laying of the revised Part 6 and SGO Code of Practices.

5. Communicating with Children and Young People

Due to the technical nature of many of the proposed changes, particularly those relating to regulatory frameworks, statutory guidance, and administrative processes, it was not considered proportionate or appropriate to directly engage with children and young people on these aspects.

However, children and young people were engaged as part of earlier consultation activity on the corporate parenting elements of the proposals. This included a participation session with care-experienced young people, where feedback was positive. Young people emphasised the importance of accessing information in formats that are easy to understand and engage with, such as websites, apps and books, and highlighted the need for corporate parents to be accountable and transparent in demonstrating progress.

This feedback from young people has been reflected in the new guidance chapter which has been inserted into the revised Code. Work is also being undertaken with

Voices from Care Cymru and their young care-experienced ambassadors to develop a toolkit to support the panels on how they engage young people. In relation to accessing information, the feedback from young people is informing work to explore the development of an online platform for children and young people and making information about rights and entitlements accessible when leaving care. We will be working closely with young people in taking forward this work.

The remaining proposals were therefore informed through extensive engagement with professionals, carers, support services, and organisations who work closely with children and young people, including those with lived experience of care. Their insights have helped ensure the reforms are shaped by a strong understanding of children's needs and rights.

Relevant information will be communicated through child-friendly formats, including accessible publications and youth forums, with organisations such as the National Adoption Service and Foster Wales supporting dissemination.

6. Monitoring and Review

To ensure the Children's Rights Impact Assessment (CRIA) remains relevant and effective, the following monitoring and review mechanisms will be put in place:

- **Integration with implementation oversight:** The CRIA will be reviewed alongside the implementation of the proposed Codes of Practice changes. This will ensure that any unintended impacts on children's rights are identified and addressed early.
- **Feedback from stakeholders:** Ongoing engagement with local authorities, third sector organisations, carers, and practitioners will help monitor how the changes are affecting children and young people in practice.
- **Review following consultation outcomes:** Once the consultation responses have been analysed and final decisions made, the CRIA will be updated to reflect any changes to the proposals and to assess whether additional mitigations or enhancements are needed.
- **Post-implementation evaluation:** A formal review of the CRIA will be scheduled within 12–18 months of implementation, aligned with any broader evaluation of the reforms. This will include consideration of feedback from children and young people where appropriate.
- **Cross-policy coordination:** The CRIA will be revisited if related policy areas (e.g. education, health, housing) introduce changes that may interact with the proposals and affect children's rights