

# Agenda – Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

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Lleoliad:	I gael rhagor o wybodaeth cysylltwch a:
Ystafell Bwyllgor 5 (Tŷ Hywel)	<b>Rhys Morgan</b>
Dyddiad: Dydd Llun, 25 Medi 2023	Clerc y Pwyllgor
Amser: 13.00	0300 200 6565
	<a href="mailto:SeneddCydraddoldeb@senedd.cymru">SeneddCydraddoldeb@senedd.cymru</a>

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## Cofrestru cyn y cyfarfod (12:30–13:00)

### 1 Ymchwiliad i Strategaeth Ddrafft Tlodi Plant Llywodraeth Cymru: sesiwn dystiolaeth 1

(13:00–14:15)

(Tudalennau 1 – 37)

Ally Dunhill, Eurochild

Mari Rege, Prifysgol Stavanger

Chris Birt, Sefydliad Joseph Rowntree

## Break: 14:15–14:30

### 2 Ymchwiliad i Strategaeth Ddrafft Tlodi Plant Llywodraeth Cymru: sesiwn dystiolaeth 2

(14:30–15:45)

(Tudalennau 38 – 44)

Victoria Winckler, Sefydliad Bevan

Sean O'Neill, Plant yng Nghymru

Dr Rod Hick, Prifysgol Caerdydd



**Egwyl: 15:45 – 16:00**

**3 Ymchwiliad i Strategaeth Ddrafft Tlodi Plant Llywodraeth Cymru:  
sesiwn dystiolaeth 3**

(16:00–17:00)

(Tudalennau 45 – 65)

Rocio Cifuentes, Comisiynydd Plant Cymru

Dr Rhian Croke, Canolfan Gyfreithiol Plant, Prifysgol Abertawe

**4 Cynnig o dan Reolau Sefydlog 17.42(vi) a (ix) i wahardd y cyhoedd  
o weddill y cyfarfod a chyfarfod cyfan y Pwyllgor ar 2 Hydref 2023**

(17:00)

**5 Ymchwiliad i Strategaeth Ddrafft Tlodi Plant Llywodraeth Cymru:  
trafod y dystiolaeth**

(17:00–17:15)

Mae cyfyngiadau ar y ddogfen hon

Yn rhinwedd paragraff(au) vii o Reol Sefydlog 17.42

Mae cyfyngiadau ar y ddogfen hon

# Eitem 2

## SENEDD EQUALITY AND SOCIAL JUSTICE COMMITTEE INQUIRY INTO CHILD POVERTY

### Response by the Bevan Foundation

The Bevan Foundation is Wales' most influential think tank. We create insights, ideas and impact that help to end poverty and inequality in Wales. We are grateful for the opportunity to respond to the Committee's inquiry. Our answers to the Committee's questions build on our response to the Welsh Government's consultation on its draft strategy.<sup>1</sup>

**Q1. The extent to which the draft strategy will support the Welsh Government and its partner organisations to maximise their contribution to reducing child poverty within the boundaries of the devolution settlement.**

The strategy is focused almost exclusively on the actions being taken by the Welsh Government itself – there is little reference to the potential contribution of other organisations such as local authorities despite their significant role.

**Q2. What best practice in tackling child poverty exists within and beyond Wales, and why do these interventions work. To what extent does the approach outlined in the strategy align with this?**

The definition used in the draft strategy focuses on resources. The interventions that work are therefore those that increase resources by:

- Increasing income by family members working sufficient hours at an adequate rate of pay. This requires:
  - Actions that help to increase labour market participation by parents (affordable and available childcare for children of all ages; flexible hours of work; better parental leave and rights).
  - Actions that increase rewards from working (more jobs with better pay and conditions; workers with higher-level skills).
- Increasing income through higher social security benefits and other grants and allowances. This requires:
  - Adequate levels of benefits that match household needs.
  - Effective eligibility thresholds and high take up rates.
- Cutting household costs by providing goods or services that would otherwise have to be purchased for free or at a reduced cost. This requires:
  - Interventions targeted on children and families
  - A focus on essential resources (i.e. housing, food, energy).

The draft strategy recognises the importance of actions to increase incomes, from work and from benefits, and to cut costs. These sit alongside numerous other interventions. The Foundation has

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<sup>1</sup> Bevan Foundation (2023) Our views on the draft child poverty strategy  
<https://www.bevanfoundation.org/resources/our-views-on-the-draft-child-poverty-strategy/>

argued that these interventions should be the main focus of the strategy, and that the Welsh Government could be more ambitious in its interventions.

**Q3. What barriers exist to implementing solutions that successfully address child poverty in Wales, and how can these be overcome.**

The following factors shape the nature of the Welsh Government's response although it is a matter of opinion as to whether these are 'barriers':

- The current devolution settlement means that the Welsh Government is not responsible for aspects of the social security system that have a direct impact on child poverty in Wales e.g. the two-child limit, the freezing of Local Housing Allowance and low rates of Statutory Maternity Pay. This limits the extent to which the Welsh Government can reduce poverty via the social security system, although this does not prevent it from developing other mechanisms or arguing for change to the current system.
- The current fiscal settlement means that it would be challenging for the Welsh Government to raise revenues to fund significant devolved grants or allowances to reduce child poverty (e.g. a child or family payment (as in Scotland)). This should not prevent the Welsh Government exploring the potential for significant interventions.
- The nature of the housing market in Wales has resulted in shortages of homes for families and increases in rents, and made delivering the Welsh Government's social housing targets difficult.
- The Welsh Government does not control much of the delivery of its interventions e.g. school governing bodies decide on school uniforms, local authorities administer free school meals.

**Q4. Which indicators should be used to measure progress in addressing child poverty and what specific and measurable targets should be set to assess this.**

The primary indicator should remain that included in the Children and Families (Wales) Measure 2010 i.e. *"every household including one or more children where household income is less than 60% of median income in the United Kingdom"*.

This measure enables comparison between Wales and other parts of the UK and over time, although it is not sufficient to monitor progress. For this purpose, the 60% median measure should be supplemented with other indicators of household resources that are more timely and which allow analysis across different sub-groups. These include:

- Proportion of parents in paid work and economically inactive.
- Proportion of parents earning a 'living income' (that is the real Living Wage and enough hours of work).
- Take-up rates of key social security benefits and Welsh grants and allowances.
- Percentage of families whose rent is not covered by social security benefits (due to the benefit cap, shortfall in LHA or loss of spare bedroom subsidy).
- Number of children in temporary accommodation.
- Number of childcare places per 1000 children for 0-1s, 2-4s and 5-10 year olds.
- Number of families in fuel poverty.

The Bevan Foundation notes that the legislation refers to the *eradication* of child poverty. To us this implies that the draft strategy should have a clear, achievable target to work towards, over a longer-term timescale, as well as realistic milestones against which progress towards eradication can be measured.

**Q5. How effective will the strategy be in addressing child poverty within specific groups of the population.**

The Bevan Foundation has said that the draft strategy could be much better targeted on different groups of children, not only children and families with protected characteristics but also those children known to be at high risk of poverty i.e. families with children aged 0-4 years, large families and single parent families.

Different groups of people require different interventions rather than a 'one size fits all' approach. For example, school-based interventions help school-aged children but do not reach pre-schoolers who experience very high levels of poverty. Given the broad brush approach in the draft strategy, it is likely that it will be difficult for it to achieve a reduction in child poverty amongst specific groups.

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11<sup>th</sup> September 2023

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## Introduction

1. In 2022, as part of the recent Wales Centre for Public Policy review on poverty and social exclusion in Wales, Peter Kenway and colleagues published a report entitled '*What makes an anti-poverty strategy effective?*'<sup>1</sup> This review suggests that the purpose of a poverty strategy is to galvanise action where this might otherwise not occur, to maintain poverty as a high policy priority and to provide a framework for action for those who wish to act against poverty.<sup>2</sup> More generally, this review provides a helpful and evidence-informed view about the efficacy of anti-poverty strategies.
2. In my view, to be effective an anti-poverty strategy should be ambitious in relation to its anti-poverty aims, appropriately specific in order to concentrate attention and action yet should retain enough flexibility so as to maintain relevance in changing contexts. The pandemic and cost-of-living crisis remind us that contexts can change rapidly; in the context of devolution, discussion about the desirability of the scope of devolved powers can evolve. A good strategy should provide a clear but flexible roadmap to guide action against poverty.

## The scale of child poverty in Wales

3. The proportion of children living in poverty in Wales pre-pandemic was 31% (poverty measured After Housing Costs for the period 2017/18 – 2019-20), marginally above the UK average of 30%. The most recent year for which data is available is 2019/20 – 2021/22, where child poverty rate is 28%, marginally below the national average (which was, again, 30%).<sup>3</sup>
4. Even when averaging over rolling three-year periods, four-nation child poverty estimates have quite large confidence intervals and minor changes over time, and the comparison of small differences between places, should be treated with caution. What is clear is that a substantial proportion of children in Wales are living in poverty and that this proportion is at-or-around the average for the UK as a whole.

## The five objectives

5. The five headline objectives relate to issues of significance for the levels and experiences of child poverty in Wales. If the associated descriptions

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<sup>1</sup> Kenway, P., Ayrton, C., Chandran, C. and Tortajada, I. (2022), [What makes an effective anti-poverty strategy?](#), Cardiff, Wales Centre for Public Policy.

<sup>2</sup> Ibid, p. 44 & p. 39.

<sup>3</sup> Households Below Average Income, 1994/5 – 2021/22 series, Table 4.16ts: Percentage of children living in households with less than 60 per cent of contemporary median income, by region and country, United Kingdom.



under these objections were comprehensive and if the priority areas suitably aligned and focussed, they could provide the basis for an effective anti-poverty strategy.

6. The objectives are presented in a sensible order. Objective 1 focusses on particularly important mechanisms to reduce child poverty in Wales and should undoubtedly be a priority (Q2). Indeed, it is good to see that reducing costs and maximising incomes has been given greater (implicit) priority as Objective 1, when compared with the 2015 Strategy.
7. Objective 2, on facilitating pathways out of poverty,<sup>4</sup> is also highly important (Q4). We know that entries into employment are very important triggers of poverty exits<sup>5</sup> and it is good to see these emphasised here. From the description associated with this objective, we can see that it is conceived in comprehensive terms, reflecting the many policies that are associated with routes to exit poverty. The priorities in relation to this objective (see below) are not quite so comprehensive, but this might be justified as representing appropriate focus of priority actions.
8. Objective 3 (supporting well-being) has value but, as currently articulated, is the least clear and coherent objective (Q6). For example, housing features prominently in the engagement account ('What we have heard') and in that of actions ("What we are doing about it?"). The evidence base supports such an emphasis. In many Europe countries, renters face higher risks of poverty than owners and this differential is in most countries increasing.<sup>6</sup> But this emphasis on housing does not feature in the associated Priority. More generally, there can be multiple influences on well-being, but the description does not really give a clear account of which are believed to be the most important. The risk is that Objective 3 is not sufficiently clear to guide policy attention and to inform action.
9. Objective 4 (Treatment, dignity and respect) relates to an important and neglected issue and is a welcome inclusion to the headline objectives (Q8). There may be a challenge in measuring progress against this objective, however, and it will be important to ensure that the emphasis placed on this issue by elevating it to a headline objective is translated into tangible action in terms of improvements to service delivery.
10. Objective 5 (cross-government working) is presented both as an end in itself and as a means to the other objectives ("If we are going to deliver against our objectives..."). It is welcome that working productively with UK government is mentioned here, given the significance of reserved social security powers for tackling child poverty. Reference is made to working

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<sup>4</sup> Hick, R. (2022), '[Promoting pathways out of poverty – and preventing the pitfalls of poverty entry](#)', Wales Centre for Public Policy blog, 30<sup>th</sup> September 2022.

<sup>5</sup> Hick, R., & Lanau, A. (2017). In-work poverty in the UK: Problem, policy analysis and platform for action.

<sup>6</sup> Hick, R., Pomati, M., & Stephens, M. (2022). Housing and poverty in Europe: Examining the interconnections in the face of rising house prices, Cardiff, Cardiff University.

with civil society and business, and to their significance for tackling poverty, though more could be said about exiting modes of engagement with these actors are believed to be working and/or how they might need to change (Q10).

### **The related priorities**

11. The priorities identified are mostly aligned with the associated objectives, though there is scope to articulate these priorities with greater specificity, to enable closer monitoring and evaluation. For instance, Priority 1 commits to ‘work at pace...to increase...provision’, to ‘press ahead’, and to ‘accelerate our work’, but it is not clear how policy action in these areas can be expected to change and how success when assessed against these priorities might be measured (Q3).
12. In some cases, some of the text contained under the priority headings re-states previous and/or ongoing activities rather than explicitly relating to the actions proposed to respond to the headline objectives.
13. Priority 2 aligns with Objective 2 in relation to employment-promotion, though is narrower in coverage than that objective (e.g. in relation to education). This may reflect legitimate prioritisation, but it is nonetheless notable. The commentary on employment inequalities would be better-placed in the preceding sections to the focus is more squarely on priority areas for action (or, this important issue might be distilled into a priority action in itself)(Q5).
14. Reflecting the less cohesive nature of Objective 3, Priority 3 could also do with further attention to ensure greater coherence across the Objective and Priority (Q7).
15. Priority 4 contains important commitments (Q9).
16. Priority 5 places appropriate emphasis on the Socio-Economic Duty. This priority makes welcome commitments regarding the sharing of expertise and best practice (Q11).

### **General observations (Q17).**

17. The draft strategy is realistic about the scale of the challenge and about the significance of policy levers retained by UK government yet demonstrates the importance and possibility of lowering the incidence, and ameliorating the negative consequences, of poverty in Wales.
18. In the course of the pandemic and the cost-of-living crisis, ad hoc decision-making by UK government has deepened a trend towards localism and has provided new funding for initiatives that can contribute towards tackling poverty. One reason for the call for greater specificity above is for the strategy to be able to fulfil the role of framework for action, that can be used to identify priority areas for action and

concentrate attention on specific aspects of the problem of poverty in an evolving political and economic context.

19. In relation to Objective and Priority 1, it was surprising that there was no mention of the Discretionary Assistance Fund, given the emphasis that has been placed on this in recent years. What conclusions have been drawn from the increased emphasis of this scheme, and what role will it play in future attempts to tackle poverty in Wales?
20. Discussion in relation to Objective 1 makes reference to the Welsh Benefits System. Research by the Bevan Foundation finds that awareness of some Welsh Benefits schemes is not high,<sup>7</sup> suggesting that challenges exist in making people aware of the support that is available to them. The social security system is widely considered to be a highly complex policy institution and it will be important that, if greater emphasis is to be placed on devolved payments as they are integrated into one, notionally-simpler system, this does not lead to the appearance of greater complexity in the social security system. The further of evolution in devolved policy efforts in relation to social security has the potential to yield positive results, but the associating complexity will need to be managed.
21. Ongoing efforts to tackle poverty in Wales are likely to lead to discussions about the desirability of new powers and how they might be utilised and how existing powers might be used in new and imaginative ways. Both are likely to require enhancing institutional capacity and one aspect of this will be the need to ensure sufficient analytic capacity within Welsh Government. As a greater number of poverty-relevant powers are transferred and associated policies are developed, monitoring the progress of anti-poverty policies pursued in other nations and regions, perhaps most obviously the Scottish Child Payment, will become an increasingly-important task if policy levers are to be exercised effectively.

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<sup>7</sup> Bevan Foundation (2022), [A snapshot of poverty in summer 2022](#), Merthyr Tydfil, Bevan Foundation.



**Comisiynydd Plant Cymru**  
Children's Commissioner for Wales

## **Paper for Equality and Social Justice Committee session on 25<sup>th</sup> September 2023, on the focused inquiry into the Welsh Government's draft child poverty strategy**

### Background information about the Children's Commissioner for Wales

The Children's Commissioner for Wales' principal aim is to safeguard and promote the rights and welfare of children. In exercising their functions, the Commissioner must have regard to the United Nations Convention on the Rights of the Child (UNCRC). The Commissioner's remit covers all areas of the devolved powers of the Senedd that affect children's rights and welfare.

The UNCRC is an international human rights treaty that applies to all children and young people up to the age of 18. The Welsh Government has adopted the UNCRC as the basis of all policy making for children and young people and the Rights of Children and Young Persons (Wales) Measure 2011 places a duty on Welsh Ministers, in exercising their functions, to have 'due regard' to the UNCRC.

### Key messages:

- Welsh Government must comprehensively revise their draft strategy. It does not match the gravity of the situation facing children and young people in Wales today. It lacks ambition and, most importantly, the strategy must be accompanied by a comprehensive Action Plan and monitoring framework which sets out targets and measurable outcomes. It is not currently clear at all how any of the draft strategy will translate into tangible actions and how or when they would be delivered.
- The extensive engagement exercises undertaken by Welsh Government are welcome, but this is not adequately reflected in the draft strategy. There is a lack of correlation between the 'what we have heard' sections reflecting engagement with children and young people, and other stakeholders and the priorities set out by Welsh Government. The strategy should also set out how feedback will be provided to stakeholders on progress of actions against the points they have raised.
- The revised strategy should be framed by the five principles of a Children's Rights Approach, and be able to comprehensively demonstrate its adherence to each one. This would go some way towards Welsh Government meeting their duty of due regard under the Rights of Children and Young Persons Measure (2011). The current strategy does not adequately demonstrate this.

## CCfW report and relevant recommendations from 2019

My office, in 2019, published the *Charter for Change* report<sup>1</sup>, which made a series of recommendations to Welsh Government and local authorities.

One of the recommendations related to the auto-enrolment of eligible families to both free school meals and the school essentials (formerly PDG Access) grant. This is just one example; the council tax reduction scheme and others should also be included in a simplified Welsh benefits systems which minimises stress and effort for applicants. Families should be able to access all the financial support to which they are entitled in a streamlined way. It should not be down to particularly clued up advisors to ensure that families receive and fill out all the different forms that may be required to access support they are entitled to. Streamlining arrangements to give families an easier route through the process(es) will result in tangible change for them, what is often described by the Government as putting money directly in people's pockets, which has to be a key aim of any effective anti-poverty strategy.

The draft strategy sets out the aim to deliver a coherent and compassionate Welsh benefits system, and that the government wishes to support people to access the UK welfare benefits to which they are entitled. However, there is not enough detail provided in the strategy as to how far a Welsh benefits system can go in terms of auto-enrolment or passporting of benefits, and striving for equity across local authorities.

Food poverty was another topic raised in the 2019 report. Objective 1 of the draft strategy states that 'learning lessons from rolling out our universal offer in primary schools will inform future changes to eligibility criteria for free school meals'. Reviewing eligibility criteria for free school meals was a key recommendation from our report. However, it is unclear how the universal offer (which emerged after our original recommendation was made) would inform consideration over eligibility criteria as of course the universal offer means that there is no eligibility criteria. Reviewing the eligibility criteria for free school meals in secondary schools should be happening right now, if it is not the immediate intention for universal free school meals to be rolled out to all learners in secondary schools.

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<sup>1</sup> Children's Commissioner for Wales (2019) *A Charter for Change: protecting Welsh children from the impact of poverty*. Available at: <https://www.childcomwales.org.uk/wp-content/uploads/2019/04/A-Charter-forChange-Protecting-Welsh-Children-from-the-Impact-of-Poverty.pdf> <sup>2</sup> Audit Wales (2022) *Time for Change – Poverty in Wales*. Available at: <https://www.audit.wales/publication/time-change-poverty-wales>



In relation to universal free school meals, Welsh Government must ensure that they retain information about former eligibility because of the fact that eligibility for free school meals also entitles families to other welfare benefits and payments through local authorities. Without this focus, universal free school meal provision could impact upon families' eligibility for other sources of income, as an unintended consequence. Eligibility criteria have also historically had a direct impact on school budgets. There needs to be a replacement criteria or process to ensure schools which would have had high proportions of their population eligible for free school meals still have sufficient funding to support learners and create equality of opportunity and provision for them.

It is unclear why the School Holiday Enrichment 'Food and Fun' Programme is not included in the relevant sections of the Strategy. Will the Programme continue to be funded and, if it is designed to provide coverage which has some equivalence to the previous provision of free school meals over the school holidays, what actions is Welsh Government taking to improve its coverage?

Issues related to child poverty also create stigma in schools, such as refusal of school meals to children whose dinner cards are in debt. I met recently with a group of young people in North Wales who told me about experiences of their peers, who had been told, in front of other children, that they could not have any dinner as their cards are in debt. No child should experience this situation and should be provided with food regardless of the debt on their card, but it should be a principle embedded within all schools that conversations around debt are not held with children themselves, only with their parents or carers. The Child Poverty Action Group have produced a guide for schools<sup>2</sup> on supporting families in times of financial hardship which could be used as a model for Welsh Government action on this issue.

### **The Welsh Government Child Poverty Review**

The Government undertook a Child Poverty Review in 2019/20. They presented the findings of their Review to some stakeholders including my office but did not publish the findings<sup>3</sup>, citing the changing context of the pandemic as a reason for this.

The findings included the fact that not everyone was accessing their full entitlements in terms of benefits, grants and other financial support; there was low awareness of entitlements

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<sup>2</sup> Child Poverty Action Group (2022) *Supporting families in times of financial hardship: a guide for schools*. Available at: <https://cpag.org.uk/policy-and-campaigns/briefing/supporting-families-times-financial-hardshipguide-schools>

<sup>3</sup> [Children's Commissioner for Wales annual report 2019 to 2020: Welsh Government response](#)



generally, which was exacerbated by literacy and language barriers; programmes offering support were restricted by postcode/area and therefore exclude some people in need; and even universal schemes weren't reaching those who need them the most.

My office challenged the decision not to publish the Review findings, by writing to the First Minister to emphasise the importance of transparency in their findings, and accountability to children and families. The First Minister's response in August 2020 noted that the findings did not reflect the current economic landscape due to the pandemic. He noted the need for actions to be taken in the here and now to maximise families' incomes, given the acute financial pressures of the pandemic at that time.

No action plan to tackle or mitigate child poverty has been created since the Government's review.

### **Cost of living work**

I have been an observer member of the Wales Expert Group on the Cost of Living Crisis, tasked with advising the Welsh Government Cabinet Sub-Committee on the Cost of Living Crisis on: the impact of the Cost of Living Crisis on people in Wales; and actions that should be taken to mitigate the impact of the crisis in Wales. This group produced a report for that subcommittee. The Group's recommendations included practical actions that Welsh Government could commit to which would help tackle the crisis, but also the longer term impacts of poverty. These include:

- *Welsh Government introduces an instalment-based Child Cost of Living Payment for low-income households with children.*
- *Welsh Government introduces an instalment-based Disabled Person Cost of Living Payment for households with a disabled person.*
- *Welsh Government extends the provision of free school meals to Years 7-11 for those households in receipt of Universal Credit, without a cap on earnings.*
- *Welsh Government extends the reach of the 'Food and Fun' programme so that it prioritises low-income families and runs across all 22 local authorities during all school holiday periods in the Autumn, Winter and beyond.*
- *Welsh Government and local authorities pilot free bus travel for young people by introduce free travel for under-16s in 24/25 for a trial period.*

While I recognise that these recommendations were made following the publication of the draft strategy, none of them are included as part of the objectives in this draft strategy.

In relation to youth work, Welsh Government should ring-fence funding for local authorities to ensure youth work is treated as an essential service, rather than one which may suffer early in budget cutting decision-making against competing and often statutory priorities. The benefit of youth services will have a knock on positive impact on health and healthy behaviours for example, so can be seen as an 'invest to save' area. A lack of investment in youth services was highlighted by professionals we surveyed for my *Ambitions for Wales* survey<sup>4</sup>.

### **The draft strategy**

The strategy should include clear ambitions which will be set against targets and timescales. It should be more ambitious and future-focussed, with measurable actions to demonstrate how those ambitions will be realised.

My office has long called for a child poverty delivery plan with measurable actions, in our 2019 report, and as a recommendation in multiple Annual Reports. Similar calls are included in a recent report from Audit Wales<sup>2</sup>, and in the Welsh Government commissioned report by the Welsh Centre for Public Policy (WCPP)<sup>5</sup>.

In their report, the WCPP state the following:

*A good anti-poverty strategy makes a big difference. If a strategy is to be more than a list of relevant policy initiatives, there needs to be a focus on the means through which the Welsh Government can ensure that those who can act, do so.*

However, the current draft strategy *does*, at various points, read like just a list of relevant policy initiatives, lacking as it does an accompanying Action Plan and monitoring framework which would detail how to effectively implement and measure the effectiveness of that strategy. The planned monitoring framework, and accompanying Action Plan, should have been published alongside this consultation.

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<sup>4</sup> Children's Commissioner for Wales (2023) *Ambitions for Wales- Findings*. Available at: <https://www.childcomwales.org.uk/our-work/ambitions-for-wales/ambitions-for-wales-findings/>

<sup>5</sup> Wales Centre for Public Policy (2022) *Poverty and social exclusion: a way forward*. Available at: <https://www.wcpp.org.uk/wp-content/uploads/2022/09/Poverty-and-social-exclusion-A-way-forward.pdf>





At various points throughout the draft strategy, it is simply stated that a policy or initiative exists, without giving any details of how it links to the relevant Objective or Priority.

### **Work and childcare**

Objective 2 focuses on education, and fair work with good conditions. However, just getting families into work will not lift families out of poverty. 26% of children in working households live in poverty, and we know that, even in households where all adults work, the likelihood of living in poverty is still 13%<sup>6</sup>. Of course, families with children are more likely to be working fewer hours and paying for childcare.

The Objective is right to point to the need for accessible and affordable childcare. The recent extensions of the childcare offer to families in education or training are very welcome. However, free childcare should be available to *all* families, as a service that directly benefits children's rights and supports child development on an even playing field, regardless of parents' employment status. Once again, the strategy falls short on providing any practical actions beyond a vision for the future. The strategy should set out which cohorts of families will be included within the childcare offer over time, and when the Government expects this to take place.

### **Communities and housing**

No child in Wales should live in unsuitable, unsafe or uncertain conditions in their home and community, and this should be clearly stated by Welsh Government with actions setting out how this will be achieved.

Part of the priority sets out the Welsh Government's objective to...

*push forward, working with partners, on the delivery of more community based offers for play, sports and youth opportunities for children and young people and low cost family activities to support health and wellbeing*

I welcome that this is a priority for Welsh Government, but once again actions must be set against these priorities. Concerns over limited opportunities for play, recreation and physical activities for children and young people in their communities was a key concern for parents

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<sup>6</sup> Welsh Government (2023) *Relative income poverty: April 2021 to March 2022*. Available at: <https://www.gov.wales/relative-income-poverty-april-2021-march-2022-html#119556>



and carers in the results of our *Ambitions for Wales* survey<sup>7</sup>. Improving access to and provision of play and recreation opportunities was a priority for children and young people responding to our survey. 7-11 year olds told us that they would like to see “more physical activities and clubs for free for all children”, “more safe parks for us to play in”, as well as supporting “places where kids can meet up and to make new friends”.

12-18 year olds mentioned the importance of providing activities in the local community, and providing ‘free transport’ to help them access opportunities.

What specific actions will Welsh Government take to make the ambition of more community based offers a reality and how will local authorities be held to account on providing these offers?

### **Accountability**

While there will be roles across Government in delivering the strategy, ultimate accountability should lie with an individual Minister who can provide drive and leadership across government. The WCPP report recommends that a good anti-poverty strategy needs one senior minister to have overall responsibility<sup>8</sup>. The current draft is not clear on where ultimate responsibility will sit.

Welsh Government is required to report on progress against the strategy every 3 years. I am disappointed that the strategy is not framed around short term, medium term and longer term actions with timescales, and would have expected Welsh Government to set out what they would like to be achieved by the time they are next required to report on progress, in 2025. It may be that the ambition for that reporting is to have specific short and medium term actions completed, and a robust Action Plan and monitoring framework in place that can be delivered against.

I acknowledge that many of the levers impacting child poverty lie at Westminster, but this should not impede Welsh Government’s ambition to do whatever it can within the powers it does have. Where the levers sit elsewhere, there is a responsibility on the Welsh Government to press future UK Governments, whatever their colour, to reverse the ‘tide’ of policy making which has such a devastating impact on the most vulnerable children in our society.

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<sup>7</sup> Ibid.

<sup>8</sup> Wales Centre for Public Policy (2022) *What Makes an Anti-Poverty Strategy Effective?* Available at: <https://www.wcpp.org.uk/wp-content/uploads/2022/09/WCPP-What-makes-an-anti-poverty-strategyeffective-September-2022-English-final.pdf>



The previous (2015) child poverty strategy lists several measures against which progress can be measured. I believe that this draft strategy must do the same. A lack of progress against those measures is not a reason not to measure. Even where there might not be great improvement in the statistics, a narrative can speak to this and how Welsh Government have made measureable differences, alongside the context of UK Government's policies which further exacerbate child poverty.

Welsh Government should commit to a pilot of free transport for all under 18s, and the objective and priority should make explicit reference to how Welsh government will tackle the issue of a lack of affordable transport for accessing opportunities which can alleviate the impact of poverty.

Previous iterations of the child poverty strategy included more narrative on measurement and accountability, as well as specific measurements. For example, the 2015 child poverty strategy<sup>9</sup> set out objectives to 'reduce the number of families living in workless households'; 'increase the skills of parents and young people living in low-income households'; and 'reduce inequalities...in health education and economic outcomes of children'. Reports in 2016<sup>18</sup>, 2019<sup>10</sup> and 2022<sup>11</sup> then reported on progress against those and other objectives. It is unclear why the draft strategy does not have similar measurables.

There are several examples of Welsh Government Action Plans which the government could use as examples to shape a revised strategy with accompanying action plan. These are some examples:

- The LGBTQ+ Action Plan for Wales<sup>12</sup> includes a comprehensive list of actions with specific activities, outcomes, timelines and action owners set against them. The Welsh Government has committed to publishing regular progress updates against these

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<sup>9</sup> Welsh Government (2015) *Child Poverty Strategy for Wales*. Available at:

<https://www.gov.wales/sites/default/files/publications/2019-06/child-poverty-strategy-for-wales-report.pdf>

<sup>18</sup> Welsh Government (2016) *Child Poverty Strategy: assessment of progress 2016*. Available at:

<https://www.gov.wales/sites/default/files/publications/2019-06/child-poverty-strategy-2016-progressreport.pdf>

<sup>10</sup> Welsh Government (2019) *Child Poverty Strategy: assessment of progress 2019*. Available at:

<https://www.gov.wales/sites/default/files/publications/2020-01/child-poverty-strategy-2019-progressreport.pdf>

<sup>11</sup> Welsh Government (2022) *Child Poverty Strategy: 2022 progress report*. Available at:

<https://www.gov.wales/child-poverty-strategy-2022-progress-report.html>

<sup>12</sup> Welsh Government (2022) *LGBTQ+ Action Plan for Wales*. Available at: <https://www.gov.wales/lgbtq-actionplan-wales>



actions, the first of which was published<sup>13</sup> within just a few months of the launch of the Action Plan. The Plan also produces regular bulletins that can be signed up to by interested stakeholders. I strongly recommend this approach being taken for an action plan linked to the Child Poverty Strategy.

- The Anti-Racist Wales Action Plan<sup>14</sup> sets out a comprehensive list of actions against timescales, time-bound to the month that action will be completed. An annual update is due to be published this month.
- The NHS National Workforce Implementation Plan<sup>15</sup> sets out specific, measurable actions time-bound to the month that each action will be completed.

The Welsh Government should commit to an accompanying Action Plan and monitoring framework which provides the same level of accountability as the above examples.

### **Children and families' views**

The methodology for the engagement exercise carried out to inform this strategy is set out in the introduction to the draft strategy. I welcome the extensive engagement sessions carried out by Welsh Government, in partnership with others. I understand that a full summary of the engagement activity will be published alongside the final version of the strategy, but a more detailed summary of that engagement would have been helpful as an accompanying document to the draft, to inform consultation respondents. It does not appear to be the case, in its current form, that the 'what we heard' sections always relate to their priorities in each section. The links between what was raised and what the government's priorities are should be explicit.

It is not clear at all how progress will be monitored, and this is the biggest issue with this strategy.

When we discussed the strategy consultation with members of our young advisory panel, they commented that there is... "not enough in there about how they will communicate back to children and young people on progress", "Not clear actions – doesn't sound like big changes

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<sup>13</sup> Welsh Government (2023) *LGBTQ+ Action Plan for Wales: progress update*. Available at: <https://www.gov.wales/lgbtq-action-plan-wales-progress-update>

<sup>14</sup> Welsh Government (2022) *Anti-Racist Wales Action Plan*. Available at: <https://www.gov.wales/anti-racist-wales-action-plan>

<sup>15</sup> Welsh Government (2023) *National Workforce Implementation Plan: Addressing NHS Wales Workforce Challenges*. Available at: <https://www.gov.wales/sites/default/files/publications/2023-01/national-workforceimplementation-plan.pdf>



– feel will be same trajectory [not improving statistics] if not real actions”. When asked if they feel the strategy will make a positive difference, a young person stated that it... “...depends on what happens after - depends on what the actions are”.

In its Concluding Observations<sup>16</sup> to the UK and devolved governments published in June 2023, the UN Committee on the Rights of the Child included a recommendation that governments should:

*Develop or strengthen existing policies, with clear targets, measurable indicators and robust monitoring and accountability mechanisms, to end child poverty and ensure that all children have an adequate standard of living*

The draft strategy briefly mentions that Welsh Government will ‘seek independent research advice on suitable national poverty indicators, data availability and a framework to monitor and demonstrate transparent accountability in reporting on our tackling poverty progress and on involving people with lived experience in telling us whether we are achieving’.

Here are some further comments from my panel on the strategy and whether they feel there are any gaps:

*Kind of vague with each of their points.*

*Think goals are good but should be focusing on food, education, healthcare, clothing. Put pressure on supermarkets to subsidise costs of foods for families on Universal Credit because prices will be lower. Supermarkets had high profits during covid.*

*Could look at shoe bank, or coats, or uniform, as well as food banks. Don't have that moment to spend on those things. Supermarkets, councils etc could advertise and uniform bank could be in food banks*

*Uniform rules could be less strict. Would help families.*

*Good to say ‘start early to make sure help from the start’*

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<sup>16</sup> UN Committee on the Rights of the Child (2023) *Concluding observations on the combined sixth and seventh periodic reports of the United Kingdom of Great Britain and Northern Ireland*. Available at: [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGBR%2FCO%2F6-7&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGBR%2FCO%2F6-7&Lang=en)



*Focus on health and education to reduce issues.*

We asked them whether the strategy is clear and easy to understand. A majority said that the strategy is easy to understand, but our panel members asked how the strategy is to actually be achieved. We asked them whether they feel the strategy will make a positive difference. Here are some of their responses:

*Makes some reasonable points but a lot of it feels like aimless ambition, there's a lack of clear practical steps or defined sub-aims.*

*I think the goals need to be operationalised, how are the government going to work on children getting the "best start in life". The statements do not describe any future actions that may take place.*

My panel also commented that there is “not enough in there about how they will communicate back to children and young people on progress”, it is important that, as well as accountability in the form of monitoring measurable outcomes, accountability is also delivered in the form of feedback to stakeholders who have contributed to this process. I hope

that the publishing of the full engagement exercise will provide part of this, but it is essential that the regular reporting required every 3 years speaks to the ‘what we have heard’ sections of this strategy which stem from the engagement exercises, and give specific details on what actions have taken place and how they have progressed.

In our *Ambitions for Wales*<sup>17</sup> survey, carried out in autumn 2022, of over 8,000 children and young people, and around 2,000 parents, carers and professional, poverty and cost of living were the most prominent themes.

Among younger respondents aged 7-11:

- Almost two thirds (61.1%) of children worry about their family having enough money;
- Almost half (44.8%) of children are worried about having enough to eat.

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<sup>17</sup> Children’s Commissioner for Wales (2023) *Ambitions for Wales- Findings*. Available at: <https://www.childcomwales.org.uk/our-work/ambitions-for-wales/ambitions-for-wales-findings/>



Among older respondents aged 12-18:

- More than half (51.5%) of surveyed young people aged 12-18 are worried about their family having enough money.
- Around a quarter (24.9%) worry about having somewhere to live and having enough to eat (25.8%).

That so many children worry about their family having enough money, having somewhere to live and having enough to eat, is quite simply heart-breaking. I do not believe that this strategy shows Welsh Government has a detailed action plan which would give children more hope, one which can be measured, and to which the public can hold government accountable.

### **Children's Rights in the strategy**

The introduction does highlight the UNCRC when discussing the evidence base in relation to gathering children and young people's views. However, the due regard duty under the Rights of Children and Young Persons (Wales) Measure 2011, and the Welsh Government's commitment to the Convention, should act as a *driver* for combating the experience of living in child poverty as an egregious breach of human rights. Welsh Government has a duty to tackle child poverty in order to demonstrate due regard for children's rights in line with their duty, and this should be explicit. Each objective should link to specific articles of the UNCRC, and how the strategy supports that right.

I am pleased to see that Welsh Government has published a children's rights impact assessment as part of the overall integrated impact assessment (IIA). The assessment recognises that different groups of children are more likely to experience poverty, and sets out how Welsh Government set out to engage with those groups. This is welcome. It is also welcome that the CRIA sets out individual articles and gives some narrative of those articles.

However, while it gives details of the articles themselves, it does not specifically give examples of how the strategy *will actually enhance* each of those rights. I believe this would have been a straightforward exercise to undertake and am disappointed that this has not been set out. As reflected in the remainder of this response, there are significant deficiencies in the current iteration of the strategy, and a more thorough analysis through completion of the CRIA should have drawn out the missing details and mitigating actions that are required to protect and uphold all children's rights.

## Observatory on Human Rights of Children – Response to Senedd Equalities and Social Justice Committee on Welsh Government’s Draft Child Poverty Strategy for Wales 2023

Please see our response to selected questions from your terms of reference for this inquiry.

1. **To what extent the draft strategy will support the Welsh Government and its partner organisations to maximise their contribution to reducing child poverty within the boundaries of the devolution settlement?**
  - We are concerned that the Draft Child Poverty Strategy (DCPS) is not built around children’s rights as set out in the UN Convention on the Rights of the Child (CRC). The *Rights of Children and Young Persons (Wales) Measure 2011* means that the CRC should be the framework for action in key areas of Ministerial intervention in children’s lives.
  - A comprehensive body of evidence confirms that poverty is amongst the greatest threats to children’s access to rights, so tackling child poverty means recognising deficits in children’s experience of rights and developing interventions to mitigate or reverse those deficits. While the DCPS is clearly intended to improve the lives of children living in poverty, we are surprised that it does not articulate a more ambitious vision for tackling child poverty grounded in the realisation of children’s rights under the CRC. Although we agree that the policies and actions of the UK Government, and the current devolution arrangements, significantly affect both the lived experience of poverty in Wales, and the ways and extent to which the Welsh Government can intervene, we remain disappointed that the DCPS does not articulate ambitious rights-based outcome targets and progress indicators.
  - We cannot see an obvious strategic approach to progressively addressing child poverty in the DCPS. While the DCPS reports on numerous (and very welcome) interventions to tackle child or family poverty, it does not articulate a clear strategic framework to identify, prioritise, plan and implement actions, allocate resources, develop outcome targets, or monitor progress and promote accountability for interventions to tackle child poverty in Wales, now and in the future. The many initiatives reported under each of the 5 objectives ‘report on progress’ rather than articulation of a strategic approach to tackling child poverty.
  - The DCPS draws on different policy frameworks, including the *Well-being of Future Generations (Wales) Act 2015* (WBFGA), to inform its objectives. In our view, this introduces a degree of confusion about the place of children’s rights in the DCPS, as well as ambiguity about outcome targets and progress indicators.
  - Welsh Government research, i.e., [Strengthening and Advancing Equality and Human Rights in Wales 2021 \(SAEHR\)](#), recognised a need for clarity about objectives to achieve the well-being goals set out in the WBFGA that recommended using human rights to provide clarity about policy priorities, outcome objectives and ~~measures~~ <sup>indicators</sup>. These recommendations



have been adopted by the Welsh Government. It is not apparent how the DCPS has taken the recommendations into account and, again, we reiterate that the framework for the strategy should be the CRC.

**2. What best practice in tackling child poverty exists within and beyond Wales, and why do these interventions work. To what extent does the approach outlined in the strategy align with this?**

No response.

**3. What barriers exist to implementing solutions that successfully address child poverty in Wales, and how can these be overcome?**

No response.

**4. Which indicators should be used to measure progress in addressing child poverty and what specific and measurable targets should be set to assess this?**

We would like to see the DCPS adopt the CRC as the primary framework for policy on tackling child poverty, and specific rights deployed as touchstones to identify deficits, develop interventions, and to establish outcome targets and progress indicators.

In our view, the DCPS could be strengthened if it were revised to:

- Directly and expressly acknowledge the CRC as the primary framework for tackling child poverty in Wales;
- Recognise where poverty has an impact on rights, beginning with those rights most obviously and adversely affected by poverty (the rights to: development, the highest attainable standard of health, education, to benefit from social security, and an adequate standard of living);
- Underpin all objectives by direct reference to the CRC and specific rights;
- Include rights-based outcome targets for all interventions;
- Include rights-based indicators to measure progress.

***Please see Annex 1: this includes our response to the Welsh Government in relation to their questions (Q2a-Q11) concerning the 5 Objectives in the draft Child Poverty Strategy and gives further consideration to the need to focus on rights-based targets/indicators.***

**5. How effective will the strategy be in addressing child poverty within specific groups of the population?**

We welcome the focus on intersectional impacts. However, the DCPS does not elaborate on how the focus on intersectional impacts will be given effect in policy development, for example, in the ongoing analysis of the impacts of poverty or the potential impact of interventions on specific groups. This aspect of a Children's Rights Approach needs to be more fully articulated in the DCPS, with a particular focus on how evidence (qualitative, quantitative and lived experience) is collated and used to inform CRIA and IIA. (See also our response to question 6 – in relation to a clear focus

on the principle of equality and non-discrimination as part of a children's rights approach to addressing child poverty).

## 6. To what extent are children's rights clearly addressed in the strategy and impact assessment?

### *The draft strategy*

- While the introduction refers to children's rights, we are concerned that the attempt to summarise what this means for the DCPS falls short of clearly expressing children's entitlement to their rights, and government's obligation to realise rights making use of available resources;
- The Introduction refers to the WBFGA and the seven well-being goals as being 'central' to a long-term anti-poverty agenda. In our view, the realisation of children's rights under the CRC should be the driver of the anti-poverty agenda for children. The substitution of well-being objectives for children's rights objectives introduces a degree of ambiguity and uncertainty about what policy in Wales should prioritise as the objectives for tackling child poverty;
- We do not agree that national milestones established to measure progress under the WBFGA are appropriate to monitor and report on progress in tackling child poverty. We see the need to establish rights-based outcome targets within the strategy, in order to facilitate the development of appropriate progress indicators;
- The *Rights of Children and Young Persons (Wales) Measure 2011* means that the CRC should be the framework for action in key areas of Ministerial intervention in children's lives. In addition, sectoral legislation prioritises attention to children's rights through public sector interventions in important areas affecting children and their families, including the lives of children living in poverty (*Social Services and Well-being (Wales) Act 2014* and *Additional Learning Needs and Education Tribunal (Wales) Act 2018*). It follows that the Draft Child Poverty Strategy (DCPS) should be built around children's rights as set out in the UN Convention on the Rights of the Child (CRC);
- We would like to see the DCPS adopt the CRC as the primary framework for policy on tackling child poverty, and specific rights deployed as touchstones to identify deficit, develop interventions, and to establish outcome targets and progress indicators;
- In our view (and as outlined in response to Q2), the DCPS could be strengthened if it were revised to:
  - Directly and expressly acknowledge the CRC as the primary framework for tackling child poverty in Wales;
  - Recognise where poverty has an impact on rights, beginning with those rights most obviously and adversely affected by poverty (the rights to: development, the highest attainable standard of health, education, to benefit from social security, and an adequate standard of living);
  - Underpin all objectives by direct reference to the CRC and specific rights;

- Include rights-based outcome targets for all interventions;
  - Include rights-based indicators to measure progress.
- The DCPS claims to adopt a Children's Rights Approach, which is a welcome commitment. We note that a Children's Rights Approach (as set out in the Children's Commissioner for Wales document 'The Right Way') provides a clear and workable framework for policy development generally, and has the advantage of having been adopted by Ministers as the framework for reporting on compliance with the due regard duty in the exercise of their functions (Children's Rights Measure), and as the framework for its Children's Scheme. It is also consistent with the Human Rights Approach to policy in Wales recommended in the SAEHR report.
  - While the commitment to a Children's Rights Approach is very welcome, we are concerned that it is not apparent how this approach has been applied in the current DCPS. The five principles of a Children's Rights Approach need to be more rigorously and consistently applied to provide a clear strategic approach to child poverty within the DCPS. We have set out below how this approach might be deployed.
  - Taking each of the principles in turn:
    - In order to **embed** rights, the DCPS should expressly adopt the CRC as the primary framework for tackling child poverty (fully discussed above);
    - The DCPS acknowledges intersectional impact which promotes **equality and non-discrimination**. This is very welcome. However, the discussion of intersectional impact does not elaborate on how this principle is given effect in policy development, for example, in the ongoing analysis of the impacts of poverty or the potential impact of interventions on specific groups. This aspect of a Children's Rights Approach needs to be more fully articulated in the DCPS;
    - The DCPS is an opportunity to set out mechanisms to **empower** children to access resources to enable them to take advantage of their rights. While there is some discussion of resource allocation in the context of current projects, the DCPS needs to more fully explain the long-term strategic vision to ensure sufficient resources are allocated to support children living in poverty. For example, through a commitment to children's budgeting, or a Children's Rights Impact Assessment (CRIA) of the Welsh Government budget, or closer attention to resource allocation in discrete policy-related CRIA;
    - The DCPS includes reference to CRIA as a mechanism to secure the **participation** of children. This is very welcome. However, the DCPS should go further to articulate key mechanisms or structures to engage children most affected by poverty in policy decision-making, as well as how children's input will be used to inform policy and interventions and how policy decisionmakers will feedback to children on how their input has influenced interventions;
    - **Accountability** is a particular area of weakness in the DCPS. The DCPS does not put forward clear rights-related outcome targets or progress indicators which are key to accountability. Nor does the DCPS set out a complaint mechanism for children (or their representatives) to use to raise concerns about the provision of services to children living in poverty. Further, the

DCPS needs to demonstrate a commitment to support advocacy services in disadvantaged communities.

- We note that the timing of the DCPS means that it does not include reference to the most recent [Concluding Observations](#) issued by the Committee on the Rights of the Child on progress on children’s rights in the UK (June 2023). In our view, the DCPS should be revised to make direct and sustained reference to relevant concluding observations and recommendations. In summary, the Committee’s recommendations direct attention to deficits in attainment of specific rights, including right to adequate standard of living, and confirm the need for clear outcome targets, measurable progress indicators, and robust monitoring and accountability mechanisms. We believe that a stronger focus on children’s rights and a clear adoption and application of a Children’s Rights Approach (as discussed above) would provide a basis for meeting the Committee’s recommendations.

### ***Impact Assessment***

Neither the IIA nor the CRIA meet the requirements of a comprehensive impact assessment or CRIA. Issues include:

- While the IIA refers to sources of evidence, it does not set out either in full or in summary the key evidence relied on to inform the decision-making when preparing the strategy. In particular it does not explain how the evidence informed objective and priority setting within the DCPS;
- The IIA refers to consultation with children and others, and how this took place. We acknowledge that the DCPS summarises the views of children under the section headed: ‘What we have heard’, as does the IIA. Unfortunately, neither the IIA nor the DCPS provide information on the views of children and others consulted on the impact of poverty on rights under the CRC, or how the Welsh government should respond to protect and promote rights for those children who experience poverty;
- The above is a particular deficit in relation to the CRIA, which is meant to focus on the impact of policy or policy proposals on children’s rights. The CRIA simply lists relevant rights without further evidence informing interrogation of how rights will be affected (positively or negatively) by actions contemplated, proposed to be taken in the DCPS;
- Neither the IIA in the sections headed ‘Impact’ or ‘What are the most significant impacts, positive and negative?’, nor the CRIA in the section headed ‘Impact on children’s rights’ set out an analysis of the likely impact of DCPS proposals on children’s rights:
  - The IIA discussion under both relevant sections reads as an expression of intent rather than an analysis of impact;
  - The CRIA discussion of impact reads as a list of rights rather than an analysis of impact on rights.

### **ANNEX 1: Observatory Response to Welsh Government Draft Child Poverty Strategy in relation to the 5 objectives.**

**Q2a. In considering the requirement under the Children’s and Families (Wales) Measure for the Welsh Government to set objectives for the contribution**

towards the eradication of child poverty, do you agree that **Objective 1** should be an objective of the draft strategy?

Comments:

- In our view, the objectives of a Child Poverty Strategy should be firmly rooted in the CRC and specific rights under the CRC (see further above 'Our response' paras. 1-3, 6 and 7);
- While some rights in the CRC are intended to ensure State support to maximise incomes for children and families, Objective 1 is broadly expressed and amounts to a general aspiration to make families better off. We feel that this is a laudable aspiration, but one which needs to be linked to clear rights-based outcome targets (e.g. drawing on CRC, Article 27, Right to an adequate standard of living, with reference to factors such as nutrition, housing and clothing), with aligned progress indicators.

**Q2b. Is the information about what we have heard and what the Welsh Government doing in relation to Objective 1 clear and accessible?**

Comments:

- We welcome the initiatives discussed under Objective 1, but we see these as 'reporting on progress' rather than articulation of a strategic approach to tackling child poverty (see further above 'Our response' paras. 8-10).

**Q3. Do you agree that Priority 1 should be a priority for the draft strategy?**

Comments:

- See above in relation to Objective 1: our comments on the place of children's rights are equally relevant to setting priorities. In our view, priorities should give clarity about how specific rights-based objectives will be met.

**Q4a. In considering the requirement under the Children's and Families (Wales) Measure for the Welsh Government to set objectives for the contribution towards the eradication of child poverty, do you agree that Objective 2 should be an objective of the draft strategy?**

Comments:

- In our view, the objectives of a Child Poverty Strategy should be firmly rooted in the CRC and specific rights under the CRC as these will provide opportunities for children to escape poverty and/or to be supported to experience their rights despite living in poverty (see further above 'Our response' paras. 1-3, 6 and 7);
- While some rights in the CRC will empower children by creating pathways out of poverty, Objective 2 is broadly expressed and amounts to a general aspiration to provide children with opportunities to improve their material living. We feel that this is a laudable aspiration, but one which needs to be linked to clear rights-based outcome targets (e.g. drawing on CRC, Articles 26 and 27, Right to benefit from social security, or Articles 6, 28 and 29, to develop in ways

which enable them to take advantage of opportunities for self-improvement now and later in life).

**Q4b. Is the information about what we have heard and what the Welsh Government doing in relation to Objective 2 clear and accessible?**

Comments:

- We welcome the initiatives discussed under Objective 2, but we see these as 'reporting on progress' rather than articulation of a strategic approach to tackling child poverty (see further above 'Our response' paras. 8-10).

**Q5. Do you agree that Priority 2 should be a priority for the draft strategy?**

Comments:

- See above in relation to Objective 2: our comments on the place of children's rights are equally relevant to setting priorities. In our view, priorities should give clear clarity about how specific rights-based objectives will be met.

**Q6a. In considering the requirement under the Children's and Families (Wales) Measure for the Welsh Government to set objectives for the contribution towards the eradication of child poverty, do you agree that Objective 3 should be an objective of the draft strategy?**

Comments:

- In our view, the objectives of a Child Poverty Strategy should be firmly rooted in the CRC and specific rights under the CRC as these will provide opportunities for children to escape poverty and/or to be supported to experience their rights despite living in poverty (see further above 'Our response' paras. 1-3, 6 and 7);
- We note and welcome that Objective 3 mentions children being able to enjoy their rights and have better outcomes. However, we feel that this should be given far greater priority as the key and overarching objective of the DCPS;
- While the intention is laudable, the objective to 'support' wellbeing and to ensure that the Welsh government 'delivers for children living in poverty' is a rather barren statement which needs to be more firmly articulated through the recognition of rights-based outcome targets and progress indicators.

**Q6b. Is the information about what we have heard and what the Welsh Government doing in relation to Objective 3 clear and accessible?**

Comments:

- We welcome the initiatives discussed under Objective 3, but we see these as 'reporting on progress' rather than articulation of a strategic approach to tackling child poverty (see further above 'Our response' paras. 8-10).

**Q7. Do you agree that Priority 3 should be a priority for the draft strategy?**

Comments:

- See above in relation to Objective 3: our comments on the place of children's rights are equally relevant to setting priorities. In our view, priorities should give clarity about how specific rights-based objectives will be met.

**Q8a. In considering the requirement under the Children's and Families (Wales) Measure for the Welsh Government to set objectives for the contribution towards the eradication of child poverty, do you agree that Objective 4 should be an objective of the draft strategy?**

Comments:

- In our view, the objectives of a Child Poverty Strategy should be firmly rooted in the CRC and specific rights under the CRC (see further above 'Our response' paras. 1-3, 6 and 7);
- Securing of rights under the CRC will inevitably advance the aspirations expressed in Objective 4. However, as for other objectives set out in the DCPS, we feel that Objective 4 is too broad to establish meaningful or measurable outcome targets as part of a strategic approach to tackling child poverty;
- Our suggestion for a Child Poverty Strategy firmly rooted in specified children's rights under the CRC will achieve the ambition of Objective 4, but will also provide opportunities for clear outcome target setting accompanied by measurable progress indicators.

**Q8b. Is the information about what we have heard and what the Welsh Government doing in relation to Objective 4 clear and accessible?**

Comments:

- While we welcome the acknowledgement of the 'due regard' duty under this Objective, we feel that the DCPS should give greater attention to this obligation both in the Introduction and throughout the DCPS to provide a foundation for a strategy more firmly grounded in children's rights;
- We welcome the initiatives discussed under Objective 4, but we see these as 'reporting on progress' rather than articulation of a strategic approach to tackling child poverty (see further above 'Our response' paras. 8-10).

**Q9. Do you agree that Priority 4 should be a priority for the draft strategy?**

Comments:

- See above in relation to Objective 4: our comments on the place of children's rights are equally relevant to setting priorities. In our view, priorities should give clarity about how specific rights-based objectives will be met.

**Q10a. In considering the requirement under the Children's and Families (Wales) Measure for the Welsh Government to set objectives for the contribution towards the eradication of child poverty, do you agree that Objective 5 should be an objective of the draft strategy?**

Comments:

- In our view, the objectives of a Child Poverty Strategy should be firmly rooted in the CRC and specific rights under the CRC (see further above ‘Our response’ paras. 1-3, 6 and 7);
- We question the need for Objective 5. While effective cross-government working and strong collaboration with regional and local government are laudable ambitions, it seems to us that these are the assumed basis of good governance rather than objectives suitable for inclusion in a specific policy-related strategy;
- In any event, as for other objectives, the CRC provides an opportunity to articulate Objective 5 drawing on a rights-based framework. In particular, the requirement set out in Article 4 to take appropriate (which would extend to effective) ‘legislative, administrative and other measures’ to implement the rights guaranteed under the CRC.

**Q10b. Is the information about what we have heard and what the Welsh Government doing in relation to Objective 5 clear and accessible?**

Comments:

- We welcome the initiatives discussed under Objective 4, but we see some of these as ‘reporting on progress’ rather than articulation of a strategic approach to tackling child poverty (see further above ‘Our response’ paras. 8-10);
- We note the structures which support improvement and collaboration but would envisage that a Child Poverty Strategy would set out ways in which the Welsh Government will promote embedding of children’s rights in the functioning of these structures (see further above ‘Our response’ paras. 4 and 5).

**Q11. Do you agree that Priority 5 should be a priority for the draft strategy?**

Comments:

- See above in relation to Objective 4: our comments on the place of children’s rights are equally relevant to setting priorities. In our view, priorities should give clarity about how specific rights-based objectives will be met.

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**11<sup>th</sup> September 2023**