

About Welsh Women's Aid

Welsh Women's Aid is the umbrella organisation in Wales that supports and provides national representation for independent third sector violence against women, domestic abuse, and sexual violence (VAWDASV) specialist services in Wales. Our membership comprises of 20 specialist support services. These services deliver lifesaving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence against children and young people, men and boys, trans and non-binary people, as part of a network of UK provision. As an umbrella organisation, our primary purpose is to prevent domestic abuse, sexual violence, and all forms of violence against women and ensure high quality services for survivors that are needs-led, gender responsive and holistic. We collaborate nationally to integrate and improve community responses and practice in Wales. We also award the Wales National Quality Service Standards (NQSS), a national accreditation framework for domestic abuse specialist services in Wales (supported by the Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks. (More information on the NQSS can be found [here](#)).

Introduction

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Welsh Women's Aid is a registered charity in England and Wales, No. 1140962
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Welsh Women's Aid welcomes the opportunity to contribute to this inquiry. At Welsh Women's Aid, we provide a range of resources, training and support for professionals working with children and young people affected by domestic abuse and sexual violence across Wales. These include the S.T.A.R (Safety, Trust and Respect) suite of services as well as advice and training for professionals including a children and young people forum, members of which contributed to the information provided within this response.

Whilst we do not wish to suggest the incidence, contributing factors and consequences are exactly the same for children who go missing and children who experience criminal exploitation, many of our main concerns are shared across both groups. As such, we have chosen to respond to this inquiry based on the main themes for both groups, with disaggregated sections where relevant.

Nature and Scale:

It is hard to assess the scale of missing children across Wales, largely due to the lack of available data. However, there is no doubt that this is an issue across Wales which can have devastating effects on children and young people. Children who go missing are highly vulnerable, particularly to criminal and sexual exploitation, so identifying them is crucial.

There is no one reliable source used to identify the number of missing children in Wales, with data being made up of individual local authority and police source data, and discrepancies among them in terms of identification and reporting. Since 2009, the National Crime Agency (NCA) has produced Missing Persons Data Reports¹, with the most recently available data from 2021-22. This shows that over 6,000 children and young people were reported missing throughout the year. However, this data is wholly reliant on reporting from police forces, and some police forces do not report the data each year, with no data reported from Gwent during this year.

The picture is similar for children and young people affected by criminal exploitation. This can take many forms, including county lines, but it is a largely hidden form of abuse meaning it is

¹ <https://missingpersons.police.uk/en-gb/resources/downloads/missing-persons-statistical-bulletins>





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hard to get an accurate picture of its prevalence. In 2021, Barnardo's made a freedom of information request to all police forces across the UK about child criminal exploitation, only one of which was able to provide any data². The report also details that in 2022, the National Referral Mechanism, which operates across England and Wales, received 7,019 referrals relating to children, with the majority (43% or 3,013) being referred for criminal exploitation³.

The scale and prevalence of child sexual exploitation, which intersects with both of the above must also be noted. Recent data from the National Police Chiefs' Council found that across England and Wales, there were around 107,000 child sexual abuse and exploitation offences in 2022⁴. Further, freedom of information requests collated by Welsh Women's Aid found that out of all public bodies (local authorities, health boards, police forces and police and crime commissioners), less than half were able to provide data regarding the scale of child sexual exploitation in their area⁵.

When asked about scale and prevalence, member services reported differential levels in their areas. One member service told us they were unsure of exact numbers but that this 'is considered a huge problem', with referral services for missing and exploited children 'overwhelmed' while another reported that every school in their area has referrals related to children vulnerable to exploitation. However, another member service told us that this 'has not been a constant theme'. Such differences suggest there are regional disparities in incidence and prevalence across Wales, with this being extremely common in some areas but relatively rare in others.

When providing further information, member services reported specific concerns about the high levels of poverty and deprivation in rural areas of Wales disproportionately contributing to this, as well as increased rates of drug usage and county lines operations in these areas. Other services also reported the increased number of vaping businesses contributing to the criminalisation of children and young people and inconsistencies in levels of understanding of risk to children and young people which is impacting referrals. For example, one service tried to refer a child for support but was told the case 'wasn't thought to be severe enough' as they were dealing with cannabis. Such cases not being taken seriously risks children and young

² https://www.barnardos.org.uk/sites/default/files/2023-05/child-exploitation-hidden-crisis-briefing-paper-June2023_0.pdf

³ ibid

⁴ <https://news.npcc.police.uk/releases/vkpp-launch-national-analysis-of-police-recorded-child-sexual-abuse-and-exploitation-csae-crimes-report-2022>

⁵ <https://welshwomensaid.org.uk/wp-content/uploads/2023/11/Operational-Group-FOI-Report.pdf>

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people falling through the cracks. This not only leaves them without the critical support they need but also shows that any data regarding prevalence will inevitably be an underestimation.

At risk groups:

Staff from our member services identified several groups at particular risk of going missing and/or vulnerable to criminal exploitation. These include:

- Care-experienced children
- Children that have been moved to live 'out of area'
- Children not in mainstream education
- Teenagers and young people
- Children from whom parental guidance is not present
- Children who have experienced domestic abuse or sexual violence
- LGBTQ+ children
- Gender-diverse children
- Children with additional needs
- Black and minoritised ethnic children and young people
- Children who have experienced child sexual exploitation (CSE)
- Children who have experienced county lines
- Children living in poverty
- Children who have experienced adverse childhood experiences (ACEs)
- Children in pupil referral units (PRUs)

Barriers to identification:

There are several barriers to identifying and engaging with children who have experience of or are at risk of going missing or vulnerable to criminal exploitation. These include:

- Lack of understanding, particularly among statutory services. Staff from frontline VAWDASV services raised concerns that a lack of understanding of the impact of abuse often led to misidentification of both abuse and related behaviours. For example, child sexual exploitation is often misidentified as consensual sexual acts between young people or labelled as 'inappropriate relationships' rather than clear identification as exploitation. Further, not attending school is often identified as 'absenteeism' or as part of offender behaviour rather

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than as part of a broader pattern of behaviours resulting from neglect or abuse which may precede missing episodes. It is vital that all those who come in to contact with children and young people are given the time and resource to undertake proper VAWDASV and trauma-informed training so that abuse and related behaviours can be identified at the earliest opportunity.

- Lack of understanding within the police. Similarly to above, trauma-informed training and VAWDASV training within the police is not sufficient enough to accurately identify abuse. It is important that children and young people are treated as survivors in their own right and they are not criminalised due to their experiences. Such criminalisation can have knock on impacts and leave children vulnerable to further missing episodes and/or exploitation.
- Inconsistencies in statutory services. Member services reported that children's services do not seem to be consistent with their approach to the children and young people they are working with, meaning the risk to these children and young people is not always being monitored and therefore they can become involved in criminal exploitation.
- Lack of trust and fear of services. Many children and young people who have experience of going missing or criminal exploitation have had their trust and safety undermined. This can mean they are scared of those in positions of authority and are too frightened to make disclosures, which may lead to them being missed or to identification very late in the process.
- Lack of engagement from children and young people. Many services reported difficulties engaging with children and young people for a variety of reasons including them being hard to reach (e.g. not being in school) and, related to the above, reluctance to speak to professionals means specialist services either cannot engage with children and young people, or the support work is inconsistent.
- Lack of engagement from parents. Member services have also reported that at times, parents do not want to engage with services which can prevent young people from accessing support. Some services have also reported lack of trust from parents after unhelpful responses from professionals.
- Language barriers. Engaging with children and young people who speak different languages is particularly difficult and can leave these children particularly vulnerable without support. This is a notable issue for trafficked and unaccompanied asylum-seeking children who are much more likely to go missing. Support services are often inaccessible to these children and more focus is needed on fully inclusive support.
- Funding issues. Specialist violence against women, domestic abuse and sexual violence services are key to early identification of vulnerable children. These children need a range of services

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but specialist services are best-placed to provide this support. Indeed, the Independent Inquiry into Child Sexual Abuse recommended that the UK and Welsh Governments must ensure all child survivors of sexual abuse be offered specialist, accredited therapeutic support⁶. Several factors such as Brexit, the COVID-19 pandemic and the cost-of-living crisis has placed specialist services in severe financial precarity and this is impacting their ability to deliver these core services, particularly those for children and young people⁷. One member service told us that a lack of funding means services are unable to provide long-term support to these children. Shorter interventions reduce the chances of supporting and monitoring the risk over a period of time to ensure they do not fall back in to exploitation or become a missing person. There is no doubt that without rapid action from Welsh Government to address this crisis and ensure a sustainable funding model for specialist services, support for children and young people will continue to be piecemeal across Wales.

- Related to the above-mentioned lack of funding, specialist services are experiencing an acute crisis with staff recruitment and retention. In our 2021 State of the Sector report, we outlined how consistency and stability for survivors, especially children and young people, is crucial when delivering a trauma-informed, needs-led service⁸. Member services stated that “keeping the same staff member is crucial in terms of building relationships with young people and with schools”, however, a lack of sustainable funding for the sector means staff turnover within specialist services is particularly high. This is impacting service delivery and undermining their ability to identify children and young people and provide the consistent, life-changing support needed for them. One of the main drivers of this is the pay disparity between equitable roles in statutory and non-statutory services. For example, in our 2021 State of the Sector report, we showed that an average local authority-based role working with children pays 9.1% higher than those in the specialist VAWDASV sector⁹. More recent internal data collected by Welsh Women’s Aid showed that a single point of contact (SPOC) worker in a local authority, who is the initial contact for a referral, is paid around £15,000-£17,000 more than a specialist domestic abuse worker.
- Difficulty collaborating between services. Information sharing between services is difficult due to confidentiality reasons. More information about this is detailed below.

⁶ <https://www.iicsa.org.uk/final-report.html>

⁷ <https://welshwomensaid.org.uk/wp-content/uploads/2022/11/Perfect-Storm-Report-ENG-compressed.pdf>

⁸ <https://welshwomensaid.org.uk/wp-content/uploads/2021/11/State-of-the-Sector-2021-ENG.pdf>

⁹ ibid

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Interventions:

Article 39 of the United Nations Convention on the Rights of the Child states that “children who have been neglected or abused should receive special help to restore their self-respect”. While there are pockets of good practice in Wales, much more must be done to fully achieve this.

Many interventions are in place to support children and young people. Member services have identified some good practice among statutory services including school support, safeguarding leads, family support workers and the police. However, there are notable patches in provision across certain areas of Wales. In our 2022 ‘A duty to support’ report, commissioned by Joyce Watson MS, freedom of information requests found a ‘postcode lottery’ of support for children and young people across Wales. We found large discrepancies in the way local authorities categorise funding, with some not directly commissioning services for children and young people at all. In addition, only 3 out of the 20 local authorities that responded to our requests have a designated children and young people’s scrutiny committee to examine the need for specialist support for children and young people. Further, in our 2019 Children Matter report, we found that the statutory support available was highly variable, with one local authority in Wales having just one part-time 5-hour per week post to support all children and young people affected by VAWDASV in that area¹⁰. Access to these services is also determined by levels of risk, which is in direct contradiction to a needs-led approach and does not account for the lived experiences of children and young people which are often complex and non-linear. This is a particular issue for children who have experience of going missing and criminal exploitation, who are often villainised for their experiences and, without adequate support, are at real risk of many repeated episodes.

As such, there is clear need for significant improvement in the support available from statutory services. In particular, staff from our member services have called for better training for statutory services and schools on the impact of ACEs more broadly but particularly domestic abuse so they can support children and young people better at an earlier stage. They also need sufficient funding to provide wider access to support for all children and young people, not just those from ‘flying start’ areas.

Due to these discrepancies, a significant amount of the provision of support and advocacy for children and young people in Wales comes from specialist domestic abuse and sexual violence services. Broader

¹⁰ <https://welshomensaid.org.uk/wp-content/uploads/2021/11/Children-and-Young-People-participation-report.pdf>





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VAWDASV support for children and young people provided by specialist services in Wales includes the Ar Trac Project, Comets and Rockets, CHYPS, the Spectrum Project, and Welsh Women's Aid's S.T.A.R (Safety, Trust and Respect) Programmes.

For children who have experienced sexual violence, abuse or exploitation specifically, these include but are not limited to:

- Barnardo's Better Futures Cymru
- Barnardo's Taith service
- Lucy Faithfull Foundation's Eradicating Child Sexual Abuse project
- Lucy Faithfull Foundation's Inform Young People programme
- Stop it Now's anonymous helpline
- New Pathways Children and Young Person's Project
- Place2Be
- RASASC North Wales
- The Sunflowers Project at RASA

More broadly, member services noted that access to proper one-to-one support was key to supporting these children and young people. It is also worth noting that evidence-based therapeutic support such as play therapy, drawing therapy and talking therapy are widely praised but are often very hard to access, particularly in a timely manner, for most people in Wales. Some specialist services choose to develop such interventions in-house and source funding for these individually, often via many streams of income, and so are extremely difficult to resource and sustain, with demand often outstripping supply.

Finally, in terms of gaps in provision, several children and young people workers from specialist services noted that community-based support is key to early intervention and prevention. They strongly feel that the erosion of youth clubs and other broader support within communities undermines access to support and a safe place, and Welsh Government must invest in such services to ensure holistic support for children and young people.

Concerns around policy and practice:

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We have several concerns around the effectiveness of policy and practice responses.

Firstly, there is no explicit legislation around child criminal exploitation. Instead, it is captured under the Modern Slavery Act (2015), the Children and Young Persons Act 1933, the Child Abduction Act 1984 and the Children Act 1989. This leads to widespread discrepancies in understanding of the impact of criminal exploitation on children and lack of early intervention. Relatedly, there are varying statutory definitions of CSE, leading to differences in the way children and young people are supported across Wales. There is a notable lack of support for young people aged 16-18, which is key to early intervention and prevention of further adult exploitation.

There is a distinct lack of joined-up, cross-directorate working. Since the Domestic Abuse Act 2021, children and young people must be seen as victims in their own right. However, there is still a broad lack of understanding of the impact of domestic abuse and sexual violence on children and young people. There is no doubt that the Welsh Government have strong intentions in this area, and we note the relevance of the Wellbeing of Future Generations Act, the inclusion of the Children and Young People workstream within the VAWDASV Blueprint as well as the welcome changes to the RSE curriculum and the peer-on-peer sexual harassment strategies. However, these strategies are piecemeal and lead to disparities in provision. This lack of joined-up working means children and young people are often unable to access the support they need in a timely manner. There is a clear need for Welsh Government to consider a wider framework that brings together these various strategies to ensure a consistent approach to approach to policy-making.

Further, where strategies do exist, they are hampered by lack of meaningful target setting by Welsh Government. For example, member services identified that one of the main groups at risk of going missing and experiencing child criminal exploitation of children living in poverty, and clear measures to reduce the number of children living in poverty are needed. However, Welsh Government's new tackling child poverty plan has been criticised by several organisations, including the Children's Commissioner for Wales, due to its lack of measurable targets¹¹. Such a lack of targets makes it almost impossible to measure progress or impact.

There is a notable lack of centralisation of children's voices when it comes to policy making or implementation. For example, in Wales, the primary framework for supporting children who go missing

¹¹ <https://www.childcomwales.org.uk/2024/01/organisations-deeply-disappointed-that-ministers-have-not-listened-response-to-child-poverty-strategy/>





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is the 'Safeguarding children who go missing from home or care' guidance¹². This is non-statutory guidance and states that "the child or young person may be offered a return home interview and follow on support by a missing children advocate or worker working with the police and they will be provided with information about this". Taking account of children's voices, for example, via return interviews, is vital when properly engaging with and safeguarding children and young people and is key to early intervention and prevention. As such, it is disappointing that this is neither mandatory nor consistent across Wales.

As outlined previously, the lack of data on missing children and children who have experienced criminal exploitation is a general issue, but particularly the lack of disaggregated data for Wales. There is very little data available and where it is available, it combines England and Wales. Welsh Government would benefit from investing money and wider resources into evidencing the nature and scale of this across Wales in order to better understand the problem and allocate budget and policy accordingly.

Devolved and UK powers:

We also have concerns around the conflict between devolved and non-devolved policy. There are increasing concerns around the operation of 'county lines' gangs across England and Wales and their exploitation of children and young people. There are increasing reports of county lines gangs spreading across the border and exploiting young people in more rural Welsh communities. There is a broad lack of knowledge about the impact of this on children and young people and how they may present to services, with much more robust training needed amongst statutory services. While we appreciate there have been efforts made by the Welsh Government to address this, including the establishment of the Violence Prevention Unit (VPU), there is a feeling that a broader, more consistent approach is needed both across the Four Forces in Wales, and also across England and Wales more cohesively.

Out-of-area placements are an area of concern. Several member services identified communication issues between services for families that have moved between boroughs, with one noting that 'communication between boroughs and out-of-area forces can be hard and inconsistent'. Another service noted that there are further barriers for families that have been placed out-of-area, stating they have to go through 'numerous people' before they get the support they need. There is no doubt

¹² <https://safeguarding.wales/en/chi-i/chi-i-c6/c6-p9/>





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that such additional hurdles may act as a barrier to support and either prevent children and young people from seeking support or leave them to fall through the net.

Further, there are issues around funding and provision between Wales and England. The funding landscape of VAWG services mean that the majority of their funding comes either from the UK Government or from the Welsh Government via the Barnett consequential. How this is allocated varies between different regions based on commissioner's priorities and this has led to a postcode lottery for support services across Wales. For example, the 'Safeguarding children who go missing from home or care' guidance¹³ states that children and young people should be given an active offer of access to a statutory IPA when they become looked after but staffing issues mean this is not always the case¹⁴.

Finally, there are significant issues when it comes to policy and practice regarding the criminal justice system between England and Wales. The justice system plays a significant role in both prosecuting and preventing violence against women and girls, which includes children and young people who are survivors of, for example, criminal and sexual exploitation. The Welsh Government are clear in their proactive approach to youth justice issues, particularly around early intervention and prevention to prevent children from entering the criminal justice system¹⁵. However, this is complicated by a criminal justice system that operates across two different Governments elected on different mandates, meaning that justice services are often not aligned with Welsh social justice policy or the specialist services that support children and young people in Wales. These areas must work effectively together to ensure a robust and holistic approach.

¹³ <https://safeguarding.wales/en/chi-i/chi-i-c6/c6-p9/>

¹⁴ https://www.childcomwales.org.uk/wp-content/uploads/2016/04/Missing-Voices_E.pdf

¹⁵ <https://www.gov.wales/delivering-justice-for-wales-2024-progress-report-part-2-html#135195>

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