



Ymateb i Ymchwiliad/ Inquiry Response

Date / Dyddiad: 11th May 2020

Subject / Pwnc: Scrutiny of Covid-19 and its impact on children and young people (including students in further and higher education)

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 National Assembly for Wales 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.

This response is not confidential.

I welcome the reintroduction of the Committee's work and scrutiny in this period, and the opportunities being provided to respond to a range of calls for evidence and views. I'll set out what my team and I have been working on since the Coronavirus outbreak, and then consider the suggested lines of inquiry from the Committee in more detail below.

Overview of CCfW work activity in this period

Although we've had to pause our face to face engagement work with children and young people at this time, we're finding new ways to work to reach out to children and young people and represent their views. We've been working with key partners to make sure messages of advice and support are reaching the most vulnerable groups, including care experienced children and young people, and young carers. The other elements of my team's core work remains largely unchanged, including responding to ongoing government consultations affecting children.

I am maintaining regular contact with senior Welsh Government officials and the Deputy Minister for Health and Social Services, to share intelligence gathered from the work of my team during this period. Issues arising from casework or from queries from professionals are being fed in to relevant officials in order to clarify the advice we are able to give, as well as influence the guidance and messaging coming out from the Welsh Government.

In addition, we've undertaken the following steps in response to the pandemic:

- All of our staff are fully enabled to work from home with access to our online systems and resources. This has meant we can continue to operate our Investigation and Advice service, offering support and advice to children, their parents and carers and professionals caring for or supporting them. As well as providing this daily bilingual service for all of Wales, we've agreed to support the Older People's Commissioner for Wales if they need additional capacity to respond to their advice calls due to the lengthy calls that they are processing.
- In mid-March, before the formal lockdown was introduced, I decided to create a [Coronavirus Information Hub](#) on my website, offering a range of support, advice, FAQs and resources, directed towards children and their families. The resources include a mix of educational materials, and fun activities for play at all ages. The Hub is available bilingually and officers from my Communications, Participation and Policy teams are working hard to

develop and create new content daily and update the guidance that is being provided. This is a significant undertaking for the office but an important task to prioritise. We've received excellent feedback on the Hub already, with many other organisations, including Government and Public Health Wales, signposting to our site.

- On 13th May 2020 a nationwide survey for children and young people in Wales will be launched, to consider "Coronavirus and me"; young people's views on the current situation, framed around key articles of the UNCRC. My office has been working in partnership with the Welsh Government, Children in Wales and the Youth Parliament to develop this online survey, the first Government-led survey of its type in the UK. My office has led on the project management of the project, and have ensured the principles of our Right Way approach underpin all aspects of the work.

Open to those aged 7 to 18, it covers key children's rights themes and issues, including health and well-being, education, the impact on social aspects of their lives and the needs of specific groups. It will enable children and young people to reflect on their experiences of the last few weeks and indicate the support they will need when schools and other facilities being to re-open. The results will inform the Welsh Government's approach to working with and communicating to Wales' younger generation during and beyond the pandemic.

A symbols version is also available for children and young people who use symbols to help support communication, alongside a picture activity task that children and young people can choose to complete instead of filling out the survey. These options will enable a diverse range of children and young people to take part, including children under 7 and children with additional support needs.

Whilst my office remains independent of Government, we thought it was important to support such a piece of work that will allow children's views to be heard directly by Government ministers and officials at this time, particularly while face to face engagement work cannot take place. We also wished to avoid the 'survey fatigue' that may arise if a number of national organisations attempted to run surveys with children in parallel. Due to our substantial experience in the field of

engagement, we have been able to lead on the project planning, including involving children and young people in developing and testing the survey, due to our previous experience of running such surveys.

Throughout this period we've also been raising a range of policy issues with officials across Government; my response below will cover the issues we've been encountering. I have deliberately chosen to take these queries directly to Government officials in a swift but direct manner; it is vitally important that scrutiny continues of all of the Government's work and decisions, but I have not felt it appropriate nor necessary to raise issues in a public arena due to the many pressures facing all those who are responding to the pandemic. As an independent Commissioner, rest assured that if the need does arise, I will make my calls for change public. In addition, my team have has been providing feedback on some draft guidance that the Welsh Government plans to issue, as I'd rather offer support be a critical friend and offer support in the drafting stages than have to raise questions or concerns after a guide is published, particularly if the information isn't clear to families.

Areas of focus as directed by the Committee

The physical and mental health of children and young people

I have stated many times, in meetings, media work and publications, that children and young people's mental health is one of the most commonly raised issues for my office, from children themselves as well as parents, carers and professionals. This is no different in the current climate, with new pressures arising from the social distancing measures meaning people's contact with their support networks, whether that is friends and family and/or professionals, is harder to access and reach than usual.

In the first week of lockdown, some families of children with disabilities were alarmed by the NICE rapid COVID-19 guidelines on critical care which seemed to indicate that people with disabilities may not be given priority to access ventilators and treatment. Following a legal letter before action in England, the guidelines were swiftly amended and we were able to add this to our Information Hub FAQs to reassure those families who had contacted us.

Throughout this period, my team have been in contact with medical professional bodies and third sector organisations. We have been informed that some health conditions usually arising or diagnosed in childhood are not being presented, for example type 1 Diabetes. This is likely to relate to people being anxious about attending medical centres or unsure which services are still operating.

Although some services like health visiting remain in contact with families, this isn't operating exactly as it usually would. Paediatricians are also not seeing children presenting as regularly as they would have done, despite clinics largely continuing using methods such as video consultations. This will affect child protection referral rates as well as health screening. The Royal College of Paediatrics and Child Health (RCPCH) have published [useful data](#) which includes information on the impact on staffing and inpatient bed capacity. We are concerned that staffing and inpatient capacity will need to be rebuilt going forward, and if we experience further waves of the virus, paediatric resources may be redeployed further.

As professional bodies look towards the recovery phase, they have shared concerns with us about multiple elements coming together: a backlog of patients who they are not seeing through a combination of delays at the clinical end, and families not coming forward; an increase in new cases coming in to health services across the board; potential further waves of Covid-19 which could be among winter pressures; and reduction in vaccinations take-up potentially leading to an outbreak of conditions such as measles.

On 23rd April 2020 I spoke out in the media to remind people that many services remain accessible even if they may look and feel a bit different to how they would usually operate. I realised that parents may be reluctant to seek help due to feeling like they might put their children or families at risk, or like they would be burdening doctors and nurses during the pandemic. But this could result in children not getting the medical help they need for potentially serious illnesses, which would completely outweigh the risk posed by leaving the house and attending hospital. <https://www.bbc.co.uk/news/uk-wales-52385095>

My team and I have prioritised remaining in regular contact with the inpatient mental health units in north and south Wales throughout this period. Both units generally report that they are

managing with staffing and young people's needs. Some young people have been discharged from Ty Lliard but I have been assured this has been a clinical decision, ensuring also that suitable community support is available. There has been one ongoing issue with the WiFi provision that has impacted upon staff members' ability to run remote therapy and advice sessions. I have raised this several times with the Chief Executives and Chairs of Cwm Taf and Swansea Bay health boards, as this is one of the areas where the contract is run by Swansea on behalf of Cwm Taf. It has been difficult to resolve this issue unfortunately, although it is fair to say that a positive response was received last week, including on-site visits by technicians. Nonetheless, I have been assured that telephone support for young people has continued.

I have also monitored availability of community mental health services, receiving updates from both the NHS and Welsh Government. A wide range of mental health services, including CAMHs and the voluntary sector, have continued to be able to offer a service, with rapid roll out of video and telephone support. My team was provided with details of how to access CAMHs in every health board in Wales, which we published on our information hub. We have been concerned, however, at the difficulty of finding such information on health boards' websites and I have written to every chief executive and chair asking them to review this.

The impact of lockdown measures on children and young people's mental health and wellbeing is currently unknown, but improvements to our mental health systems that the CYPE committee and I have been pushing for such as a whole school approach and a 'no wrong door' system when children and their families require support is likely to be needed more than ever in the recovery period. I was planning to publish my report into how Regional Partnership Boards plan and provide for children's wellbeing in the third week of March but decided it would not be appropriate to publish it at that initial stage of the emergency. The findings are with RPB chairs and government and I will publish in due course. I will ensure that this report is shared with the Committee when it is published.

I have also maintained regular contact with secure/youth justice settings in Hillside SCH and Parc YOI. Again these settings report that they are currently managing the health and well-being of staff and young people. They also report high morale amongst everyone, and have noticed that the nature of the provision means that they are in some ways sheltered from the effects of lockdown

measures in the community. They are both able to offer Skype access to all young people, for family contact as well as therapeutic interventions and review meetings. They've managed to maintain education provision in both settings and found lots of different activities they can offer to continue to support health and well-being.

There were early concerns, however. In the first week of the lockdown measures I wrote to the Secretary of State for Justice in the UK government having become aware that YOIs, including Parc, were being required to follow the same highly restrictive regimes as adult prisons, which involved almost total isolation of young people in their rooms round the clock. Parc YOI swiftly responded to new advice for YOIs that was provided within a few days and implemented an innovative new programme of small, 'family-group' education, association and mealtimes, which the boys have reportedly responded well to, with incidents of peer violence lower than before the lockdown period. This is reflected positively in the HMIP published report on 'short scrutiny visits to young offender institutions holding children' on 7th May 2020, following recent inspection visits to Parc and some other YOIs in England.

Shielding letters initially caused a lot of concern for families contacting my office, including letters not being issued, and the systems for support from local authorities and supermarkets not recognising letters issued by GPs directly, letters in a child's name where an adult is doing the shopping, and access to other supports. These concerns were raised with the Welsh Government and I've been able to advise families that these issues have since been resolved. Any families continuing to face difficulties such as this can contact my Investigation and Advice service <https://www.childcomwales.org.uk/contact/>

We were also made aware by Carers Trust Wales that young carers in Wales face challenges in accessing supplies, such as medicines and food, as their vital role is often not readily recognisable or identified. The identification of young carers is a long standing concern which has been highlighted by this crisis.

Vulnerable and disadvantaged children (including pupils with special educational needs and disabilities, children in need, looked after children and children eligible for free school meals)

Access to free school meals is a major support to many families in term time, and I am pleased that the Welsh Government maintained provision of food for eligible families including over the school Easter holiday period. This is something that I would like to see continue in future, even beyond the pandemic, particularly as the summer holidays cover a 6 week break. Food and Fun and Holiday Hunger programmes have been very welcome, but they only reach a small proportion of those who would otherwise access a free school meal in term time.

The Welsh Government had proposed a national payment/voucher scheme but this is no longer being pursued. I've since reviewed and analysed the provision from each local authority at present and have noted the following:

- Variation in the amounts being provided (some do not specify an amount, one LA £15, many at £19.50 and one at £20 per week).
- Provision to date has varied greatly from supermarket vouchers, direct payments/ bank transfer, provision of frozen meals for the week, provision of ingredients to make a packed lunch, and 'grab bags' being collected from a school hub. The intention of free school meals is for children to have a hot meal, so the provision of meals to heat up or money to purchase these items seems to be preferred by families that have contacted the office as opposed to loaves of bread and crisps. I recognise that some families may be experiencing fuel poverty at this time but this is the feedback I've received from families so far.

I welcome the fact that the Welsh Government have confirmed the daily allowance at present is £3.90 per pupil¹. This is based on calculations of the actual cost to provide a suitable lunch, as well as missed breakfasts and school milk for some pupils. This is the highest figure in the UK at present and I want to ensure that all eligible families are receiving the full benefit of this funding. I

¹ <https://gov.wales/sites/default/files/publications/2020-05/ATISN%2013904.pdf>

understand that the LA offering £15 per week are now updating their provision in line with Welsh Government expectations.

I understand that some local authorities have welcomed having families collect the provision as they are able to also keep in touch with the children when they attend to collect the food, to see if they need any support with their education or anything else. However, some families have also highlighted difficulties getting to school hub locations, particularly with limits on travel and public transport and my team has raised concerns with Welsh Government as well as the relevant local authorities. I am pleased to note that most local authorities have now implemented a direct payments system and some are considering or already offering some flexibility including food boxes/parcels delivered by school staff. Direct payments are less stigmatising than a voucher scheme, and continue to the flexibility for families to shop wherever suits them, close to home, and to meet their child's individual needs and dietary requirements.

I'd like local authority websites to be clearer on how to access provision and how the entitlement operates; in undertaking my own review not all of the information was up to date, specific to the pandemic and/or particularly easy to locate. With new families potentially becoming eligible during this period due to job losses and the furlough scheme, it is important that families can access this provision swiftly and in a straightforward way.

The pandemic has also highlighted the issue of food security for children and families many of whom will be struggling but not eligible for free school meals. The Trussell Trust have highlighted that 122% more food parcels have been going to children in the UK compared to the same period in the previous year.² Whilst it is not the only solution, I am pleased to see that some local authorities are providing additional food parcels for families that are particularly vulnerable and provide additional information about what is available on their free school meal webpages.

Consideration of the provision of free school meals has re-raised the concerns I highlighted in my [Charter for Change](#) report on children's experiences of poverty in Wales; I'd like to see auto enrolment of children eligible for free school meals and the PDG Access grant when applying for

² <https://www.trusselltrust.org/2020/05/01/coalition-call/>

other benefits such as housing benefit or council tax reductions. I've asked the Welsh Government and WLGA to look at how this can be introduced in all areas of Wales, so families don't miss out on the help that should be available to them.

We've received a number of queries about children with additional needs, including access to education facilities that are familiar to them, and continuity of support at home such as therapies or tuition.

We've also had queries regarding the plans to reopen schools, concern over who should be prioritised and wanting schools to reopen to support vulnerable children. We've been able to provide some written feedback to the Welsh Government on how to support vulnerable children or those with additional needs to attend education in a safe and supportive environment and I'm anticipating them publishing revised guidance on this very soon.

I have also shared the concerns raised about the potential of some learners to be excluded from ongoing education support due to a lack of IT equipment or internet access. Schools have done well to continue to set work and tasks, and offer support online, with the HWB platform being extremely useful, but I'd raised with Government the concerns about those without access to the technology they would need. Government issued some guidance following steps taken in England; initially this wasn't clear but now all families should be advised to contact their local authority if they are having any difficulties. I've made sure groups like young carers and care leavers are being specifically thought about in these discussions. I've also raised the fact that some children don't have somewhere quiet to work with a desk and a chair to use. I've spoken out on this issue in the Welsh media and on Radio 4's Today programme <https://www.bbc.co.uk/programmes/m000hvk>

I've published a blog on how I think these issues should be tackled in future as well as in this period, making it clear that such educational inequalities were present for children before the pandemic and will continue without action <https://www.childcomwales.org.uk/our-work/sallys-blog/what-the-lockdown-has-made-visible-about-childrens-lives/>

I've also included dedicated sections of advice and resources, including direct video messages, on my Information Hub, for groups such as care experienced children and young people, young carers, and children with additional needs.

Children's services, including social care and safeguarding

It is welcome that Wales has chosen not to relax any of the statutory requirements in relation to children's social care and safeguarding, unlike changes brought forward in England. The changes in England have been well documented in media and social media activity, which has led to a number of queries to my office regarding children in Wales. I've been pleased to confirm that the changes haven't applied to Wales, but I have also encouraged Welsh Government to make this message clearer in the public facing messages and communications and services. I did see a letter from one Regional Partnership Board to all their elected members, noting that the criteria and threshold for social care support had been raised to only those with the most urgent need; when I raised this with them they accepted that this was only for adult services but this was not stated within the letter and I wanted to ensure that clear messages were being transmitted. I have made a written submission to Welsh Government suggesting some clarification in the wording of recent guidance on children's social services during the pandemic and have been assured that these changes are being actively considered.

Through my regular engagement with Welsh Government officials I have repeatedly sought assurances on how local authorities and schools are keeping in touch with children and young people known to need additional care or support. It has been reported to me that local authorities are assessing every individual case using a RAG rating system in terms of face to face contact. I am aware that review meetings and family contacts are taking place largely using video calling, and this has at times allowed more family members to participate without travel requirements. This is something that may well be considered for the future alongside the reintroduction of direct contact. I have asked the Welsh Government to share the monitoring data that they are gathering from local authorities, so that I can look at this from an independent standpoint; I have not received this yet but expect to receive it soon.

In the media work I've highlighted above, I also involved the All Wales Heads of Children's Services, including this quote "We are very aware of the risk of some safeguarding matters not being brought to the attention of our services due to children having less contact with their schools and with the other agencies who usually work with families," said Marian Parry Hughes, chair of the All Wales Heads of Children's Services Group. "It is therefore imperative that anyone who has any concern knows that help and support is available and that they can contact the local authority with their concerns." I have also included information on my hub for children, young people and adults about online safety and concerns about abuse, neglect and other forms of harm and spoken out about the needs of children experiencing domestic abuse.

I am keeping a look out for promising emerging practice that I think could be continued beyond the pandemic period. For example, Voices from Care have instituted a new offer for care leavers which includes virtual hangout sessions. This seems like a really great way to bring a peer support and social network together and makes it accessible to a wider audience. I am keeping a note of emerging practice like this in order to ensure that changes can be carried forward beyond this crisis phase.

Some concerns have also been raised with my office regarding the lack of visible support services for children and young people to access directly. I've made an effort to add specific relevant information to my Information Hub on this, and to raise this with Welsh Government. I know the Government have issued some written statements about this for example, but these might not be the best way to reach children and their families directly. I did suggest to Government that they consider some sort of mail-out to children directly, comprised of fun activities but also including some key contact information that they might need. I'm also aware that the UK Government has recently funded a new NSPCC campaign to reach out to children.

Access to independent advocacy has been an important additional safeguard for vulnerable children at this time. Independent advocates, whilst operating remotely, have been able to be accessed by children and young people, and have ensured that children in care have been able to speak to a trusted adult. We have been made aware of incidents where placements have broken down abruptly, young people being unable to contact their social workers and young people being concerned about contact with their birth families during this period. Being able to contact

advocates at this time has been an important way of children being listened to and accessing information.

Early childhood education and care, including impact on the childcare market and childhood development

I am aware of a range of concerns regarding the sustainability of the childcare sector in Wales. I was copied in to correspondence from CWLWM Partnership raising their concerns about the Job Retention Scheme and various sources of funding. I raised this with the Welsh Government to ensure it was being considered. I am aware that the Welsh Government announced that they would cover the costs of critical workers' childcare for an initial three month period and that this is due for review in mid-May. I also understand that initial concerns about access to the furlough schemes have since been clarified by a letter issued from Welsh Government dated 1st May, noting that Social Care employers are able to use this scheme if their employees have been contacted by the NHS to say that they should be "shielding" for a period of 12 weeks, and that all UK organisations with a PAYE scheme on the 28 February are able to make use of the Coronavirus Job retention scheme, regardless of their status as private or publicly funded organisations.

Childcare, whether this is term time in a nursery, child minding or a kids' club during the school holidays, has an important role in the lives of children and families. Attending good quality provision can have a positive impact on a child's development, particularly in their early years. Parents and carers choose to use childcare for a number of reasons including while they go out for work. Children of critical workers and those identified as vulnerable have continued to be able to access some childcare provision at present. However as various restrictions are lifted, in whatever guise, the childcare sector, along with others like the play sector, will be needed in the short, medium and long term. If concerns about financial stability continue, many settings/providers will struggle to operate again if the situation remains unchanged. The Welsh Government should be advocating for sector support at a UK Government level as well as considering what can be delivered here in Wales. It is important that this sector is accounted for in decisions around financial support offers here in Wales so that when appropriate there are sufficient, well support and quality settings for children to return to.

There have been several contacts to my office from parents about access to childcare provision and paying for provision that they are not permitted to access.

I note that Government guidance in a range of areas, including education and childcare, is being updated very regularly to reflect the changing situation day by day. My team is ensuring they stay up to date in order to provide the most recent information to families, but note that it has at times been confusing or hard to find the right information when announcements are being made each day. Not all the changes appear as news stories on the Government's website, or marked as new/updated guidance, so you have to search through a range of guidance to find the relevant changes.

I've also heard concerns about the closure of green spaces, particularly in areas where families might not have their own gardens to use. I've passed these on to the Welsh Government, but I've also tried to ensure that the play resources I've included on my Information Hub use materials that will be found in the house, such as the recycling bag.

Statutory school education, including arrangements for remote learning, continuity of learning, the impact on educational outcomes and the implementation of the critical workers policy

I've noted above some concerns about access to remote learning.

There have also been some concerns raised by education and youth work professionals, with conflicting advice appearing on how to keep in touch with young people who might need some extra support. Guidance from the NUS teaching union reportedly cautioned against making telephone contact in case of safeguarding issues. Whilst well intentioned, that creates the risk that vulnerable pupils may not be contacted at all despite needing some extra advice or support at this time. Professionals have also sought clarification on whether or not parental consent is needed for children to engage in online activities and youth work.

My message throughout this period has been to encourage professionals to remain in contact with the young people known to them, as they will already know who might be vulnerable at this time. I have received many reports of schools staying in touch in innovative ways with their learners, but

am waiting to hear from Government the results of a data gathering exercise they concluded on the 7th May to receive assurance about the all-Wales picture in regards to support for vulnerable learners.

Exams and qualifications (including vocational qualifications)

From the outset of the social distancing measures and associated policy changes, the procedures for this summer's exam cohorts has been one of the most common reasons for young people and their families to contact my office.

I recognise that young people have worked extremely hard throughout their school careers towards their exam season, and to have the arrangements changed so suddenly must have been disappointing for many pupils, although I realise that this will also have been a relief for others. I tried to reflect these feelings in this blog post entry back in March <https://www.childcomwales.org.uk/our-work/sallys-blog/keep-being-you-keep-being-awesome/>

Concerns raised with me have included:

- Young people receiving home tuition from their local authority not being awarded predicted grades;
- Home educated young people not able to have predicted grades either;
- Young people who have had physical or mental ill health throughout the year and were hoping to recoup some marks in their exams this summer;
- Arrangements for years 10 and 12 including chances to take some exams in the autumn or January rather than have their full grade rest on exams sat in 2021, and/or some modules being able to be 'banked' on a predicted grades basis like for years 11 and 13; and
- General uncertainty about the arrangements that will be applied. Much of the messaging was targeted at adults rather than children and young people directly, which created a lot of unanswered questions and worries.

I will be responding in full to the current Qualifications Wales consultation which closes on 13th May.

It is my understanding that Qualifications Wales are trying to put in place the fairest system possible, and I do acknowledge what a difficult task this is for them in a fast moving environment and on an issue that has the potential to create additional anxiety and uncertainty for our young people. I hope that all those who have concerns will respond to the call for evidence from Qualification Wales.

Higher and further education, including the financial sustainability of the sector, the effect of changes to courses, student accommodation and other student services, and the impact of this on students' legal rights

Student financial support including the impact on students who have lost their part-time employment.

Due to my remit primarily covering children aged 0-18 I have not had many student finance or higher education queries raised with me. We did raise one query from young people about the continuation of EMA payments right at the start of lockdown. We secured confirmation of ongoing payments from the Welsh Government and added this to our Information Hub site.

Youth work

I am aware that many youth workers have offered to repurpose their roles to support with education provision at this time; this has been a welcome move. Youth services in general appear to have found ways to continue to support young people, including online support.

As noted above I've also passed on some queries from youth workers to the Welsh Government, regarding consent to engage in virtual youth work. I've also raised concerns about key worker status and received confirmation from the Welsh Government that youth workers supporting activities such as health and well-being or education provision can be classed as critical workers.

Support available for the workforce, including (but not limited to) health, social care, education, children's services, and youth workers.

I am aware that Social Care Wales have introduced 'critical worker' ID cards; these have reportedly been very well received, allowing social workers to receive some of the benefits on offer to NHS workers. I am aware of ongoing discussions to extend some other benefits such as reduced/free travel.

In general it is positive to note that many areas of the children's workforce are still reporting high capacity in their workforce.

Parents and carers

We are using our Information Hub, social media (especially Facebook) and our Investigations and Advice service to continue to provide support and guidance to parents and carers.

Where we've offered feedback to Welsh Government on their guidance and drafts, we've tried to think of this from children and their families' perspectives, to ensure that advice is clear and authoritative.

We've also made sure to correct any misunderstandings where advice or guidance from England is wrongly being applied or assumed to be applied here in Wales.

I've shared this message for parents on Twitter

"The services that help your children might look and feel a bit different but they are still there, so please use them. They include:

- Hospitals and GPs
- Help and support from your local authority's family support service
- Mental health support"

<https://mobile.twitter.com/childcomwales/status/1253297865901867008>

I've also encouraged parents / carers to continue to attend appointments for childhood immunisations by teaming up with Public Health Wales's communications work. I have shared such

messages on my social media platforms: https://www.bbc.co.uk/news/amp/uk-wales-52457775?_twitter_impression=true

Children's rights

I am aware from the Committee's session on Tuesday 5th May 2020 that the Welsh Government have not completed any Children's Rights Impact Assessments (CRIA).

Although the Coronavirus Act 2020 is UK Government legislation, the decisions made to inform the Regulations in Wales should be subject to a CRIA.

I have, however, welcomed the fact that children's services regulations remain in force in this period, ensuring that safeguarding and child protection duties continue. This hasn't always been clear as much of the media and social media have focused on the changes in England, so it was positive to hear a clear statement on this from the Welsh Government in that Committee session.

The Welsh Government have approached my office for advice on impact assessments in this period and my Head of Policy and Public Affairs will be meeting with officials on 12th May.

I understand that the urgency and the overriding public health emergency drove the initial phase of regulations, but the 3-weekly review process allows for impact assessments to be undertaken on a rolling basis. If it hasn't been possible to assess impact on children and young people or obtain their views prior to enacting the original Regulations, how will the ongoing impact be monitored in order to inform ongoing policy development? This is also relevant as the Government moves into the 'recovery phase'; how will they know what to change and when, without understanding the impact the decisions they've taken have had and whether any particular groups are affected adversely, including groups that perhaps weren't originally considered when the Regulations were first made?

Whilst I do not necessarily expect to see lengthy written documents for all the areas of an impact assessment, I would expect impact assessments to be undertaken and also published. My ongoing scrutiny role is difficult to undertake fully without understanding the considerations that the

Government have gone through in reaching any decisions. It will also promote openness and transparency, and should reassure people that their circumstances are being considered, as I've had contacts from children and young people and their families who feel their particular circumstances are currently being ignored.

Lastly, I've written to all of the Police forces in Wales to remind them of the importance of children's rights and a trauma informed approach to policing at this time. Young people may not understand the measures that are now in place, or there may be other influences over them, including County Lines drugs gangs or Child Sexual Exploitation. They may not be being suitably guided and supported by adults in their households to comply with guidance, or their carers may be struggling to ensure that young people in their care comply with guidance.

Whilst I do not underestimate the significant challenge all Police and frontline staff face in managing and keeping us safe during this public health crisis, I wanted to ensure that vital public protection measures would still take place alongside the enforcement of these restrictions in a trauma-informed way. For example, for officers to ask, 'Are you ok?' and 'What's going on?' if they see groups of children out and about, before reminding them of social distancing rules.

Submitted by:



Professor Sally Holland

Children's Commissioner for Wales